

# Forests & People First

The need for universal  
REDD+ Safeguards



**GREENPEACE**

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# Invitation

*Forests & People First* is a consultation document proposing a set of minimum principles/standards that enshrine the strong safeguards necessary for REDD+ and other forest and climate programmes to deliver the desired benefits to local communities and their forests. Strong safeguards (understood here as required measures to prevent potential harm and maximise effectiveness) can also serve to block non-desirable, damaging activities that would do more harm than good.

This document does not seek to endorse or reject REDD+ as a concept, but rather to ensure that a minimum set of robust and effective safeguards be complied with where REDD+ and other forest programmes are implemented. The current standards and architectures of international institutions do not provide sufficient instruments to ensure that rights are respected and forests protected in such programmes, increasing the risk that REDD+ interventions lead to perverse outcomes.

This paper is meant to serve negotiators, policy makers, civil society and others involved in financing, designing and/or implementing REDD+ programmes to develop, implement and monitor policies and measures in a more coherent and effective way. If agreed by a large number of actors, strong safeguards can also be a powerful tool for affected communities to defend their rights and interests.

We hope that this initiative will be a step towards greater harmonisation and stronger recognition of an international safeguards framework for REDD+ and other forest initiatives.

We invite you to participate in this consultation. We are proactively seeking your thoughts and input and are asking your support for this initiative as a tool to strengthen safeguards internationally. We kindly request that organisations coordinate their comments, i.e. one rather than multiple comments per organisation. The deadline for comment – which must be submitted via email to [redd.safeguards@greenpeace.org](mailto:red.d.safeguards@greenpeace.org) – is 2 September 2012.

In addition – time allowing – we would like to ask for your general opinion on the scope and direction of *Forests & People First*. Our brief survey can be found at: <http://www.surveymonkey.com/s/BT9CV2G> and can be filled in individually.

## 01 Introduction

Since COP 16 in Cancún, governments have agreed<sup>1</sup> that safeguards are required for the implementation of REDD+. They are indispensable, both to ensure the effectiveness and sustainability of REDD+ and to ensure coherence with international standards on environment and human rights. Governments included important safeguard elements in the Cancún Agreement and instructed SBSTA<sup>2</sup> to develop guidance on providing information on how these would be addressed and respected. The process stalled somewhat in Durban, and many felt some governments were even moving backwards on their commitments regarding safeguards, since the final decision was mostly related to modalities to provide information rather than on the actual information to provide. Although the discussion about the level and contents of SBSTA guidance continues, no guidance or policies have yet been developed at an international level to operationalise and actually implement REDD+ safeguards.

**For the development of effective Safeguard Information Systems it is important to have greater clarity on the actual substance of the safeguards that are being reported on. In other words, before we start working out how we collect and provide information, we should agree on what we need to be informed about and how this system is embedded in an implementation and compliance framework.**

**Any potential emerging global funding mechanism for REDD+ will need a robust safeguards framework in order to be effective. At the end of the day, however, this is true for all forest related initiatives, be they called REDD+ or otherwise.**

There is a multitude of processes, institutions and initiatives, and many of these follow different policies. Some have only recently developed their own safeguard policies (GEF)<sup>3</sup>, others are in the process of reviewing them (World Bank). What they all have in common is that they are not coherent. This lack of coherence is undermining the effectiveness of REDD+ and forest programmes globally, and can lead to a “race to the bottom” allowing forest countries to choose the agencies with the lowest standards.

The current situation makes life hard for recipient countries that are dealing with a plethora of donors and institutions, and that have to respond to and implement a multitude of different policies. The lack of common standards and of sufficient capacity and resources adds to the reporting burden and is an impediment to effectiveness of programmes and efficient use of resources.

The World Bank's Forest Carbon Partnership Facility (FCPF) has tried to address the problem by adopting a “common approach” to safeguard policies, by agreeing on bottom line provisions that all its implementing agencies (“delivery partners”) will have to meet<sup>4</sup>. While the adopted minimum standard still falls short of addressing all relevant issues adequately, it is a step in the right direction. It is important that strong coherent safeguards and policies are implemented throughout different initiatives and, eventually, result in an upward harmonisation at UNFCCC level.

A number of REDD+ countries have begun to develop their own national safeguard standards, a development that – if carried out in a participatory, transparent manner and in compliance with international obligations – is to be strongly encouraged. While taking into account national circumstances, common ground is needed at international level in order to ensure consistency if we want to reduce and halt deforestation globally. A robust international framework can help forest countries in developing their own national systems and generate confidence from the international community and investors.

In order to inform these processes, we have compared the various existing REDD+ relevant safeguard policies across institutions, identified major gaps and formulated a set of recommendations that could lead to a more coherent and more practicable approach to implementing safeguards.

While this paper only compares multilateral policies, bilateral contributions make up a large part of current REDD+ and forest financing. We strongly encourage national governments and bilateral agencies to review their own standards and take the necessary steps to ensure harmonisation with international safeguards.



## 02 Comparison across institutions and initiatives

The Safeguards Matrix (Appendix I) compares forest/REDD+ relevant safeguards and standards across 11 agencies against 6 principles:

- Environmental and Social Impact Assessment;
- Protection of Natural Forests and Native Biodiversity;
- Respect for Land, Resource Rights and Equitable Benefit Sharing;
- Recognition of Indigenous Peoples' Rights;
- Full and Effective Stakeholder Participation; and
- Transparent and Effective Governance.

We do not claim this matrix to be all-inclusive and comprehensive, but consider these minimum principles that need to be in place because without them, REDD+ and other forest initiatives are bound to fail.

It is important to note that not all policies compared in this matrix are mandatory. Notably, the REDD+ SES<sup>5</sup> and UN-REDD SEPC<sup>6</sup> are considered voluntary guidance, and could thus be expected to be stronger on paper. The REDD+ SES are being developed through a participatory process to develop best practice guidance to governments for implementation of REDD+. The different status and role they have may make them difficult to compare with other standards, but their well developed content and explicit reference to the Cancún safeguards provide useful insight into what should be required to render REDD+ and forest initiatives effective globally.

We cannot over-emphasise the fact that we have only compared policies on paper, not their implementation in practice or the degree to which they are being respected. Certain “ticks” in the matrix – while encouraging – may therefore be taken with a grain of salt.

A full version of the matrix including information on the substance of different safeguard policies is provided in Appendix I.







### Box 1: REDD+ issues not part of the matrix

Three other vital REDD+ issues that are not part of this matrix are: permanence, the displacement of emissions (“leakage”), and additionality. All are essential to ensure any climate mitigation potential from REDD, but are difficult to measure and verify at the national level and arguably impossible to do so at the sub-national level.

The CBD proposes that a “stringent application of the ecosystem approach, resulting in comprehensive land-use planning at the landscape level and the national level” would reduce the risk of leakage at the national level. At the international level, the risk of displacement of pressure on ecosystems could only be reduced by broad participation in REDD+ across all countries with forest resources, and by “monitoring changes in biodiversity across all main terrestrial and freshwater ecosystems”\*. The complexity of these problems needs to be acknowledged, however the lack of serious measures taken to resolve them raises doubts about the general feasibility and sustainability of REDD+.

None of the existing standards address them in a substantive or sufficient way. Where they do attempt to do so, it is largely through a “definitional fix”, where these issues are defined as smaller than they really are – for example, leakage is defined in boundaries often only at sub-national level.

\*CBD COP 5 Decision V/6 and COP 7 Decision VII/11

<b>Legend</b>	 Binding Policies	 Voluntary Guidance	 Cancun Agreement	 covered by the policy/standard	 not covered by the policy/standard	 partially covered by the policy standard

	UNFCCC	REDD+ SES v2	UNREDD SEPC v3	UNDP	FAO	FCPF	WB	IDB	ADB	AfDB	FIP	GEF
<b>1) Environmental and social impact assessment</b>												
a) Full range of direct, indirect and cumulative social and environmental issues assessed	X	-	-	✓	-	✓	-	✓	✓	✓	-	✓
b) Policies/programmes assessed at strategic level and actions at project level	X	✓	X	✓	-	✓	-	✓	✓	✓	X	-
<b>2) Protection of natural forests and native biodiversity</b>												
a) Protect natural forests and other natural ecosystems from conversion (into other land uses such as plantations) and degradation (from high impact activities such as industrial logging)	-	-	-	-	X	X	X	X	-	X	X	X
b) Maintain native biodiversity and other key values in natural forests	✓	✓	✓	X	-	-	-	-	-	-	-	-
<b>3) Respect for land, resource rights and equitable benefit sharing</b>												
a) Statutory and customary rights to lands, territories, and resources (including carbon) are identified, recognised and secured	✓	✓	✓	X	X	X	X	X	X	X	X	X
b) Programme/project benefits shared equitably through participatory mechanism	X	✓	✓	X	X	-	X	X	X	X	-	X
c) No physical relocation or economic displacement without prior agreement	-	✓	✓	-	✓	X	X	-	X	X	X	-
<b>4) Recognition of indigenous peoples' rights</b>												
a) Respect and recognise statutory and customary rights of indigenous peoples to land, territories and resources	✓	✓	✓	✓	✓	X	X	X	X	X	X	X
b) Free, prior informed consent (FPIC) of indigenous peoples required for any activities affecting their rights to land, territories and resources	✓	✓	✓	✓	✓	X	X	-	X	X	X	X
c) Respect and protect traditional knowledge and cultural heritage of indigenous peoples	✓	✓	✓	✓	✓	X	X	X	X	X	X	X
<b>5) Full and effective stakeholder participation</b>												
a) All stakeholders are able to participate fully and effectively in all stages of REDD+ programmes	✓	✓	✓	-	✓	✓	-	-	✓	✓	X	-
b) Stakeholders have timely access to relevant information, in accessible form and language at project level	-	✓	✓	✓	✓	✓	✓	✓	✓	✓	-	✓
<b>6) Transparent and effective governance</b>												
a) promotes transparent and effective national forest governance	✓	✓	✓	-	X	✓	-	-	-	X	-	-
b) complies with international obligations	✓	✓	✓	-	-	-	-	-	✓	X	X	-
c) stakeholders have access to effective local and/or national redress and grievance mechanisms	X	✓	✓	✓	✓	✓	X	X	✓	✓	X	X
c) stakeholders have access to independent funder accountability mechanism	X	✓	✓	-	-	✓	✓	✓	✓	✓	-	X

## 03 Observations

Multilateral bodies are employing two broad types of environmental and social safeguard standards in their programmes: REDD+ specific standards and their own existing safeguard policies.

There are currently three main REDD+ specific safeguard initiatives. UN-REDD (comprised of UNDP, FAO, and UNEP) has developed a set of Social and Environmental Principles and Criteria (SEPC)<sup>7</sup>. The Forest Carbon Partnership Facility (FCPF) has adopted a safeguards “Common Approach” for FCPF delivery partners that combines REDD+ specific requirements with core elements of the World Bank’s safeguard policies<sup>8</sup>. Currently the World Bank, the Inter-American Development Bank (IDB) and UNDP are considered FCPF delivery partners<sup>9</sup>. While the FCPF’s approach includes important REDD+ specific requirements, its in-principle reliance on the World Bank’s existing safeguards falls short of the more forward-leaning standards of other initiatives<sup>10</sup>.

A third initiative – the REDD+ Social and Environmental Standards (REDD+ SES), facilitated by the Climate, Community & Biodiversity Alliance (CCBA)<sup>11</sup> and CARE – is not being applied by multilateral bodies but serves as voluntary guidance for pilot countries, some of which are receiving support from UN-REDD or the FCPF.

Two other multilateral bodies active in REDD+ programming, the Forest Investment Program (FIP) and the Global Environmental Facility (GEF), have few REDD+ specific safeguards and to a significant degree defer to the safeguard policies of implementing agencies. GEF agencies must show rough equivalence with a set of minimum standards derived from principles of the World Bank’s safeguard policies, with modifications<sup>12</sup>. While the FIP has developed overall principles and criteria for its programmes<sup>13</sup>, implementation relies solely on the respective MDBs, leading to the absurd situation that several different policies apply within one single country plan.

It must be noted that the nature of the three REDD+ specific safeguard initiatives differs: whereas the REDD+ SES and UN-REDD SEPC are voluntary guidance and best practice principles and criteria (unless voluntarily covenanted in legal agreements), the FCPF’s safeguard standards are mandatory. This difference also applies when these initiatives are compared to existing policies of Multilateral Development Banks (MDBs), which are generally anchored in mandatory policies and procedures.

Despite being strong on paper, the non-binding nature of some REDD+ specific standards raises uncertainty regarding the degree to which they serve as actual safeguards (understood here as required measures to prevent potential harm and maximise effectiveness).

Looking across six categories of safeguard-related areas, the key findings are:

- **Comprehensive environmental and social assessment** procedures are generally well articulated in the policy frameworks of multilateral bodies active in REDD+. However, as evidenced by FCPF’s SESA instrument, more strategic, upstream, participatory processes are needed for REDD+ planning.
- **Protection of natural forests and biodiversity:** Current policies of most multilateral bodies do not adequately safeguard natural forests and native biodiversity. At the MDBs, constraints on conversion/degradation activities largely apply only to a subset of natural forests labelled “critical natural habitats”. Only one initiative, the Forest Investment Program, has a clearly articulated policy to protect natural forests from degradation (through industrial logging etc).
- **Respect for land and resource rights:** Current safeguard policies of multilateral bodies do not adequately ensure security of land tenure and resource rights in programme implementation. While a number of current policies call for identification of tenure security issues – some guiding documents even make explicit reference to tenure reform – they generally do not propose standards for their resolution (such as recognition of customary rights).
- **Recognition of rights of indigenous peoples:** REDD+ SES, UN-REDD, and UN agencies clearly articulate recognition and respect for indigenous peoples’ rights, including implementation of free, prior, informed consent (FPIC). Current safeguards of MDBs, including the FCPF, do not.
- **Full and effective participation:** REDD+ specific safeguard initiatives – at least on paper – do integrate stakeholder participation into planning, implementation, monitoring, and evaluation of REDD+ programmes. Policies of MDBs tend to emphasise consultation but not full participation (except for limited elements of some types of projects).
- **Transparent and effective governance:** REDD+ specific safeguard initiatives emphasise transparent and effective governance, with a particular emphasis on forest governance. Existing policies of multilateral bodies are more broadly focused on analysis, capacity building and institutional strengthening across any number of sectors, but provide no specific indicators to measure governance performance. The degree to which MDB forest sector projects achieve capacity development and improved governance requires evaluation.

## 04 Gap analysis

### Protection of natural forests

The UNFCCC Cancún safeguards state that REDD+ actions should be “consistent with the conservation of natural forests and biological diversity, ensuring that [REDD+ actions] are not used for the conversion of natural forests, but are instead used to incentivise the protection and conservation of natural forests and their ecosystem services, and to enhance other social and environmental benefits”<sup>15</sup>.

Best practice guidance contained in both REDD+ SES and UN-REDD SEPC reflects this requirement. Existing safeguards of multilateral bodies (except for the FIP) do not, requiring protection from “significant” conversion only for a subset of natural forests labelled “critical natural habitats”.<sup>16</sup> Multilateral bodies generally allow financing of projects that may convert or degrade natural habitats<sup>17</sup> as long as mitigation measures are implemented, including the controversial use of biodiversity offsets. All of the existing standards – except for the Forest Investment Program – seem to ignore the second “D” in “REDD+”: Provisions to prevent/avoid forest degradation, for example through logging operations, are virtually absent across the board.

While the UNFCCC forest safeguards require clearer definition, a major gap appears to exist.

### Rights to land and resources, tenure security

Existing policies of multilateral bodies fall short of the standards regarding security of land tenure in comparison to REDD+ specific safeguard initiatives. Securing clear land tenure is fundamental, arguably a precondition, for ensuring long-term forest protection and permanence of reduced forest carbon emissions. Uncertainty around land titles and rights – including carbon rights – is perhaps the most significant impediment for REDD+ schemes. It is also one of the most complicated, with no easy answers. FCPF and existing MDB safeguard policies emphasise the need for identifying land tenure issues, but contain no requirements to clarify them. The lack of clearer standards on recognition of titles and customary rights poses significant risks to rights holders, and ultimately also to investors.

### Rights of indigenous peoples

In contrast to UN agencies and the REDD+ SES initiative, existing MDB policies do not fully recognise the rights of indigenous peoples in accordance and compliance with international obligations and instruments.<sup>18</sup> While the FCPF and FIP have taken steps to strengthen engagement with indigenous peoples, they fall short in critical areas, such as recognition of FPIC. Troublingly, recently enacted GEF “minimum standards” take the World Bank’s outdated policy on Indigenous Peoples as the minimum benchmark. While GEF took the additional step of acknowledging FPIC, it limits application only to countries that have ratified ILO Convention 169<sup>19</sup>.

### Transparent and effective governance

The UNFCCC highlights the need for transparent and effective governance as a core safeguard for REDD+. Unlike the conventional safeguards of the MDBs, REDD+ specific initiatives reflect this commitment, and many multilateral bodies have underwritten forest sector reform initiatives. Unfortunately, implementation has been fraught with conflict, and at times multilateral agencies have worsened the situation through conflicting priorities. The lack of governance criteria and indicators make implementation and monitoring difficult.

### Full and effective participation

On paper most multilateral bodies now require timely access to relevant information in accessible form and language. Full implementation is required to ensure that stakeholders may fully and effectively participate in decision-making. Uneven approaches to and insufficient funding for participation, however, may create barriers. Stakeholder Participation – and its difference to “consultation” – still appears to be either poorly understood or poorly implemented. One of the barriers to genuine participation may lie in the lack of clear standards for it and/or in the absence of recourse if it is not realised.

## 05 Implementation and compliance

Safeguards are only effective if they are properly implemented. It is therefore crucial to have an adequate and verifiable compliance architecture in place. This includes comprehensive up-front assessment before programs are accepted and effective monitoring and supervision upon implementation. Accountability and/or grievance mechanisms that are accessible to affected local communities and that respond to complaints in a timely and transparent manner are necessary to address non-compliance.

MDBs require borrowers to covenant agreements to implement identified safeguard measures as part of legally binding loan or grant agreements (which provides, in theory, recourse for non-performance). MDBs are required to review borrower compliance through supervision missions and borrower monitoring reports. UNDP guidelines require supervision missions and environmental monitoring reports.

If stakeholders believe that they may be harmed by non-compliance with agreed safeguards, they may file complaints with MDB accountability mechanisms, potentially triggering a problem-solving exercise or compliance review, depending on the institution. UNDP and FAO, as part of their commitments under the FCPF Common Approach, are currently<sup>20</sup> creating complaint and redress mechanisms. Most bodies now require support for effective local grievance mechanisms as well.

In addition, the governance structure of the FCPF, FIP, GEF and UN-REDD allows stakeholders to directly raise issues regarding compliance to decision-making bodies through civil society and indigenous peoples' observers. The effectiveness of these somewhat "informal" channels remains questionable. While programmes of the FCPF Carbon Fund have to comply with World Bank mandatory safeguards, the FIP has no formal compliance mechanism and relies on individual policies of the implementing MDBs and the IFC. REDD+ SES is overseen by multi-stakeholder committees at country level and at international level that also provide similar opportunities.

At this stage of development of the REDD+ SES initiative, the primary means of ensuring implementation is through participation of stakeholders in assessing programmes through a process defined in guidelines for the use of REDD+ SES at country level. As a voluntary tool, REDD+ SES does not include a compliance and redress architecture, and it is not clear what means affected communities would have to address non-compliance if the national systems are inadequate or unresponsive.<sup>21</sup>

At its March 2012 meeting in Asunción, Paraguay, the UN-REDD's Policy Board chose to "endorse" the revised SEPC "as a guiding framework for REDD+ countries".<sup>22</sup> Many external stakeholders had mistakenly believed that the SEPC would become binding standards for UN-REDD agencies as opposed to a set of best practices. As noted above, in voluntary guidance there is no mechanism for ensuring implementation and compliance. UN-REDD will need to clarify how its agencies will utilise SEPC, including the complementary Benefits and Risk Tool it has developed and what means rights holders and affected communities will effectively have to address non-compliance.



## 06 Synergy with other UN conventions

REDD+ and other forest initiatives need to be in compliance with international social and environmental obligations and agreements, and need to support and not undermine them. Resources could be used more efficiently by exploring synergies and using existing expertise and thereby avoiding doubling of efforts. One agreement particularly relevant to forests and REDD+ is the Convention on Biological Diversity (CBD) and the “Aichi Targets” (see Box 2).

The targets relate to safeguarding ecosystems and signatories to the CBD have undertaken to incorporate them in their national biodiversity plans and to develop indicators for them with other partners<sup>23</sup>. These indicators could be doubly used for REDD+ and Aichi targets and form part of the monitoring.

### Box 2: Examples of UN CBD Aichi targets relevant to REDD+<sup>24</sup>

**Target 2:** By 2020 at the latest, biodiversity values have been integrated into national and local development and poverty reduction strategies and planning processes and are being incorporated into national accounting, as appropriate, and reporting systems.

**Target 3:** By 2020 at the latest, incentives – including subsidies – harmful to biodiversity are eliminated, phased out or reformed, in order to minimise or avoid negative impacts, and positive incentives for the conservation and sustainable use of biodiversity are developed and applied, consistent and in harmony with the Convention and other relevant international obligations, taking into account national socio-economic conditions.

**Target 5:** By 2020, the rate of loss of all natural habitats, including forest, is halved and where feasible brought close to zero, and degradation and fragmentation is significantly reduced.

**Target 7:** By 2020, areas under agriculture, aquaculture and forestry are managed sustainably, ensuring conservation of biodiversity

**Target 11:** By 2020, at least 17% of terrestrial and inland water, and 10% of coastal and marine areas, especially areas of particular importance for biodiversity and ecosystem services, are conserved through effectively and equitably managed, ecologically representative and well connected systems of protected areas and other effective area-based conservation measures, and integrated into the wider landscapes and seascapes.

**Target 14:** By 2020, ecosystems that provide essential services – including services related to water – and contribute to health, livelihoods and wellbeing are restored and safeguarded, taking into account the needs of women, indigenous and local communities, and the poor and vulnerable.

**Target 15:** By 2020, ecosystem resilience and the contribution of biodiversity to carbon stocks has been enhanced through conservation and restoration of at least 15% of degraded ecosystems, thereby contributing to climate change mitigation and adaptation to combating desertification.

## 07 Conclusions

As would be expected, the REDD+ SES Standards, developed through a participatory multi-stakeholder process, appear to be the most comprehensive and responsive to the UNFCCC safeguards. The initiative's generic principles and criteria are extensive and detailed. As a voluntary initiative that is not linked to a funding agency, REDD+ SES has focused on providing developing country governments with guidance on implementation to meet internationally accepted standards. What REDD+ SES lacks at this stage is agreement on, and a process for, independent verification of implementation and compliance. By its voluntary nature, the use of REDD+ SES relies on incentives created by the national and international recognition countries should receive and the potential for enhanced access to finance.

While the UN-REDD SEPC provides a relatively comprehensive, responsive framework, its status as voluntary guidance is troubling and raises serious concerns on the commitment of UN agencies to implement it.

The FCPF's SESA requirement represents a high standard regarding integration of social and environmental issues and stakeholder participation in the development of national and sub-national policy approaches. However, over three years into the readiness process it is still unclear to what extent it is being implemented and how exactly it relates to the World Bank's mandatory safeguard policies. In lieu of a clear mechanism, compliance seems to be at the discretion of the FCPF participants committee, and adherence to standards often remains subject to interpretation.







Existing MDB policy frameworks are clearly inadequate. They have yet to respond to the rather glaring gap between the Cancún requirement to safeguard natural forests and biodiversity, and the MDBs' limited approach to protect "critical natural habitat" from "significant" conversion. The provision to allow for offsetting harm to ecosystems is equally inadequate, and is a threat to environmental integrity. MDBs further need to urgently update their policy frameworks to fully respect the rights of indigenous peoples as well as comply with other relevant international obligations and agreements. One of the most important gaps to be filled, in particular with a view to REDD+, concerns standards on land and resource rights and tenure security.

## 08 Recommendations

- All agencies, bodies and institutions – whether international, national, regional or multi-lateral – need to upgrade and harmonise their safeguard policies and align them with international human rights and environmental obligations. This is necessary in order to ensure that REDD+ and other forest programmes deliver the expected benefits and do not harm the environment and forest peoples.
- The most glaring – and potentially fatal – gaps are being observed in the areas of natural forest protection and the respect of rights/securing of land tenure. Agencies need to fill these gaps by adopting policies that:
  - ensure and prioritise the protection of natural forests and native biodiversity (by adopting policies prohibiting the financing of programmes that contribute to the conversion and degradation of natural forests through mono-culture plantations or logging operations). See, for example, Forest Investment Program<sup>25</sup>.
  - promote and respect rights to land and resources and ensure tenure security.
- MDBs need to update their policies to respect the rights of indigenous peoples, in accordance with international obligations and instruments and include – among others - the principle of free, prior, informed consent.
- Institutions and their policies, the MDBs in particular, need to comply with relevant international obligations and agreements<sup>26</sup>
- Currently the REDD+ SES provides the strongest and most comprehensive safeguards framework and can serve as a reference/guidance for international agencies in reforming their policies.
- Criteria and indicators for transparent and effective governance need to be included in safeguards frameworks and related information systems. Useful guidelines and frameworks for monitoring governance have been developed – by the World Bank and FAO<sup>27</sup>, for example, as well as UN-REDD in co-operation with Chatham House<sup>28</sup>. In addition, the FLEGT<sup>29</sup> process has developed expertise in strengthening and assessing forest governance and in promoting participatory approaches. The Governance of Forest Initiative of the World Resources Institute<sup>30</sup> has developed useful indicators to monitor and assess forest governance that can be built upon.
- In order to make assessments of impacts of REDD+ on biodiversity and on indigenous and local communities cost-effective and feasible, they could be linked to the monitoring efforts for the Strategic Plan for Biodiversity 2011-2020, including the Aichi Targets. Some indicators are already being monitored and can be reported where relevant, others are being developed.<sup>31</sup> Avoiding duplication of efforts can be particularly important in countries where there is a current lack of capacity to perform much additional monitoring for REDD+.
- Even where safeguards in principle look strong on paper, the overall lack of effective compliance architectures and accountability mechanisms make them unlikely to be observed in practice. Environmental integrity and forest peoples' rights are competing with powerful financial interests, therefore safeguard policies need to be binding and embedded in a solid compliance architecture, including transparent and accessible accountability mechanisms. REDD+ and forest programs should include independent monitoring, using participatory approaches such as parallel reporting<sup>32</sup>.
- Implementation and monitoring of safeguard measures are currently grossly under-funded in all existing processes, nationally and internationally. Resources for safeguards make up a fraction of the funds provided for carbon accounting and measurement, design of pilot projects to generate carbon credits, and other measures to prepare countries for a future carbon market that is unlikely to materialise and will not generate durable results of forest protection. This gap needs to be closed urgently. Safeguards must not be treated as an afterthought, but need to be front and centre if forest initiatives – REDD+ or other – are to generate results for forests and people.

# Appendix I: Safeguards Matrix

## 1) Environmental and Social Impact Assessment

	UNFCCC	REDD+ SES v2	UN-REDD SEPC v3	UNDP	FAO
a) Full range of direct, indirect and cumulative social and environmental issues assessed	 No specific provision	■ Calls for comprehensive assessment, including indirect, cultural, human rights. Assessment of cumulative impacts not specified	■ Assessment procedures not specified (addressing principles and criteria implies identification of wide range of impacts)	 Integrated, comprehensive assessment required, including indirect and cumulative impacts	■ Integrated assessment required, including cumulative impacts. However, only "directly related social impacts" covered
b) Policies/programmes assessed at strategic level and actions at project level	 No specific provision	 Assessment requirements apply to project and programme levels	 Not specified	 Assessment requirements apply to project and programme levels	■ EIA guidelines apply to projects (including regional and sectoral) but not to policies and programmes



**Legend**


 Binding Policies















 Voluntary Guidance

 Cancun Agreement

 covered by the policy/standard

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 partially covered by the policy standard

FCPF	WB	IDB	ADB	AfDB	FIP	GEF
<p> Comprehensive Strategic Environmental &amp; Social Assessment (SESA) required (including indirect/cumulative impacts)</p> <p> SESA required for strategies and programmes; framework for project assessments required</p>	<p> Assessments required to examine environmental and limited range of social impacts (including indirect/cumulative impacts)</p> <p> Assessment requirements apply to projects (including regional and sectoral). For policies, assess borrower systems if significant environmental “effects”</p>	<p> Comprehensive, integrated assessments required, including indirect and cumulative impacts</p> <p> Assessment requirements apply to projects, programmes, policies</p>	<p> Comprehensive, integrated assessments required, including indirect and cumulative impacts</p> <p> Assessment requirements apply to projects; modified requirements apply to programmes</p>	<p> Comprehensive integrated assessment required, including indirect and cumulative Impacts. Note: lack of clarity how requirement interfaces with requirement on use of country systems</p> <p> Applies SESA to policies and programmes, ESIA to projects. Note: lack of clarity how requirement interfaces with country systems</p>	<p> Calls for “appropriate” SGs of MDBs that receive FIP finance (MDB assessment policies apply)</p> <p> Not specified</p>	<p> Requires agencies to conduct comprehensive assessment, including indirect / cumulative impacts</p> <p> Assessment requirements apply only to projects</p>

## 2) Protection of natural forests and native biodiversity

	UNFCCC	REDD+ SES v2	UN-REDD SEPC v3	UNDP	FAO
a) Protect natural forests and other natural ecosystems from conversion (into other land uses such as plantations) and degradation (from high impact activities such as industrial logging)	<ul style="list-style-type: none"> <li>■ Actions consistent with conservation of natural forests and biological diversity, not used for conversion of natural forests, incentivise protection and conservation of natural forests and ecosystem services, enhance other social and environmental benefits. Degradation not addressed</li> </ul>	<ul style="list-style-type: none"> <li>■ Programme maintains and enhances biodiversity and ecosystem services, does not lead to conversion of natural forests or other areas important for maintaining and enhancing identified biodiversity and ecosystem service priorities. Degradation not addressed.</li> </ul>	<ul style="list-style-type: none"> <li>■ Activities do not cause the conversion of natural forest to planted forest, unless as part of forest restoration; reducing conversion of forests to other land uses (e.g. agriculture, infrastructure) to be a priority; avoid or minimise degradation</li> </ul>	<ul style="list-style-type: none"> <li>✗ Requires identification of impacts but does not apply a standard regarding conversion/ degradation of natural forests or ecosystems. Assessment and mitigation measures required</li> </ul>	<ul style="list-style-type: none"> <li>✗ Limits degree of conversion/ degradation for subset of natural forests (no significant conversion/ degradation of "critical natural habitats"). Allows conversion/ degradation of "non-critical" habitats under limited conditions.</li> </ul>
b) Maintain native biodiversity and other key values in natural forests	<ul style="list-style-type: none"> <li>✓ Actions are consistent with the conservation of natural forests and biological diversity</li> </ul>	<ul style="list-style-type: none"> <li>✓ Maintain and enhance biodiversity and ecosystem services potentially affected by programme</li> </ul>	<ul style="list-style-type: none"> <li>✓ Maintain and enhance multiple functions of forest including conservation of biodiversity and provision of ecosystem services</li> </ul>	<ul style="list-style-type: none"> <li>✗ Not specified</li> </ul>	<ul style="list-style-type: none"> <li>■ Required to "take into account" multiple values of biodiversity and its components. Projects to be compatible with principles and obligations of CBD and other international environmental agreements</li> </ul>

**Legend**

- Binding Policies
- Voluntary Guidance
- Cancun Agreement
- ✓ covered by the policy/standard
- ✗ not covered by the policy/standard
- partially covered by the policy standard

FCPF	WB	IDB	ADB	AfDB	FIP	GEF
<p><span style="color: red; font-size: 1.2em;">✗</span> follows World Bank SGs. limits degree of conversion/ degradation for subset of natural forests (no significant conversion/ degradation of "critical natural forests/habitats"). Allows conversion/ degradation of "non-critical" natural habitats under limited conditions. Finances forest plantations only if no conversion/ degradation of critical natural habitats</p> <p>■ FCPF Objective includes testing ways to sustain or enhance livelihoods of local communities and to conserve biodiversity. Applies World Bank SGs that call for maintenance of biodiversity as goal but not specific standard</p>	<p><span style="color: red; font-size: 1.2em;">✗</span> Limits degree of conversion/ degradation for subset of natural forests (no significant conversion/ degradation of "critical natural forests/ habitats"). Allows conversion/ degradation of "non-critical" natural habitats under limited conditions. Finances forest plantations only if no conversion/ degradation of critical natural habitats</p> <p>■ Establishes goal of maintenance of biodiversity and other values but does not set as standard except for critical natural habitats</p>	<p><span style="color: red; font-size: 1.2em;">✗</span> Limits degree of conversion/ degradation of subset of natural forests (no significant conversion/ degradation of "critical natural habitats"). Allows conversion/ degradation of non-critical natural habitats if no feasible alternatives exist and acceptable mitigation plans in place</p> <p>■ Maintenance of biodiversity and other values applied to critical natural habitats</p>	<p>■ For "critical habitats", requires no measureable adverse impacts that could impair function and no reduction in endangered species. Bans financing of commercial logging in primary tropical moist or old-growth forests. Allows conversion/ degradation of non-critical natural habitats under limited conditions</p> <p>■ Risks to biodiversity must be assessed. Requires mitigation measures to achieve "no net loss" of biodiversity</p>	<p><span style="color: red; font-size: 1.2em;">✗</span> Projects allowed in "critical habitats" if no negative effects on criteria of area or endangered species and net positive gain achieved in biodiversity. Allows "significant modification" (i.e. conversion/ degradation) of "natural habitats" if appropriate mitigation measures applied</p> <p>■ Objective is to preserve biodiversity and ecosystem integrity by avoiding or minimising impacts, achieve "net gain" of biodiversity through mitigation and offsets, special attention to ecosystem services</p>	<p><span style="color: green; font-size: 1.2em;">✓</span> Seeks "confirmation" that FIP investment will not support conversion, deforestation or degradation of [natural] forest, inter alia, through industrial logging, conversion of natural forests to tree plantations or other large-scale conversion</p> <p>■ Objective is "to sustain biodiversity and ecosystem services" but does not set as standard (proposals "should" support protection of biodiversity and strengthened resilience of ecosystems)</p>	<p><span style="color: red; font-size: 1.2em;">✗</span> Limits conversion/ degradation of subset of natural forests (no conversion/ degradation of "critical natural forests/habitats"). Allows conversion of "non-critical" natural habitats under limited conditions</p> <p>■ Maintenance of biodiversity and other values applied to critical natural habitats. Mitigation (including maintenance of ecological services) and offsets to be applied for adverse impacts on non-critical natural habitats</p>

### 3) Respect for land, resource rights and equitable benefit sharing

	UNFCCC	REDD+ SES v2	UN-REDD SEPC v3	UNDP	FAO
a) Statutory and customary rights to lands, territories, and resources (including carbon) are identified, recognised and secured	✓ Respect for the knowledge and rights of indigenous peoples and members of local communities, by taking into account relevant international obligations, national circumstances and laws, and noting that the UN GA adoption of UNDRIP	✓ Recognises and respects statutory and customary rights to lands, territories and resources which indigenous peoples or local communities have traditionally owned, occupied or otherwise used or acquired. Carbon rights based on statutory and customary land rights	✓ Respect and promote the recognition and exercise of the rights of indigenous peoples, local communities and other vulnerable and marginalised groups to land, territories and resources, including carbon	✗ No specific provision. Land tenure issues to be identified where relevant	✗ Requires that projects address security of land tenure but does not require recognition of customary rights except for indigenous peoples (see below)
b) Programme/project benefits shared equitably through participatory mechanism	✗ Not specified	✓ Transparent, participatory, effective and efficient mechanisms established for equitable sharing of benefits among and within relevant rights holder and stakeholder groups taking into account rights, costs, benefits and associated risks	✓ Ensure equitable, non-discriminatory and transparent benefit sharing among relevant stakeholders with special attention to the most vulnerable and marginalised groups	✗ Not specified	✗ Not specified. For indigenous peoples, see below.
c) No physical relocation or economic displacement without prior agreement	▣ No specific provision. Regarding indigenous peoples, refers to respecting relevant international obligations and notes passage of UNDRIP (which prohibits involuntary IP relocation)	✓ Requires free, prior informed consent (FPIC) of affected indigenous peoples and local communities if any relocation or displacement	✓ Ensure there is no involuntary resettlement as a result of REDD+ (involuntary resettlement defined as physical or economic displacement or relocation without consent)	▣ Requires identification of resettlement issues but does not prohibit involuntary resettlement. For projects involving indigenous peoples, FPIC standard applies	✓ FAO prohibits projects that involve involuntary resettlement



**Legend**


 Binding Policies






















 Voluntary Guidance

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 partially covered by the policy standard

FCPF	WB	IDB	ADB	AfDB	FIP	GEF
<p> Requires identification of land tenure and resource rights issues but does not require recognition of customary rights except in some cases for indigenous peoples (see below)</p>	<p> Requires identification of land tenure and resource rights issues but does not require recognition of customary rights except in some cases for indigenous peoples (see below)</p>	<p> Requires identification of land tenure and resource rights issues but does not require recognition of customary rights except in some cases for indigenous peoples (see below)</p>	<p> Requires identification of land tenure and resource rights issues but does not require recognition of customary rights except in some cases for indigenous peoples (see below)</p>	<p> No general provision on land and resource rights. Where involuntary resettlement, land claims, including those based on customary law and traditional usage, "may" be regularised. Secure tenure provided for physically displaced</p>	<p> "Should" catalyse and support acknowledgement of rights and role of indigenous peoples and local communities. Includes indicators on legally recognised tenure rights and secure access to economic benefits</p>	<p> Requires identification of land tenure and resource rights issues but does not require recognition of customary rights</p>
<p> FCPF Objective is to pilot a performance-based payment system for Emission Reductions generated from REDD activities, with a view to ensuring equitable benefit sharing and promoting future large scale positive incentives for REDD</p>	<p> No general requirement of equitable benefit sharing. For projects that affect indigenous peoples, see below</p>	<p> No general requirement of equitable benefit sharing. For projects affecting indigenous peoples, see below.</p>	<p> No general requirement of equitable benefit sharing. For projects affecting indigenous peoples, see below.</p>	<p> No general requirement of equitable benefit sharing</p>	<p> Proposals "should" show how investments will catalyse and support equitable benefit sharing</p>	<p> No general requirement of equitable benefit sharing. For projects that affect indigenous peoples, see below</p>
<p> Follows World Bank SGs</p>	<p> Avoids or minimises involuntary resettlement but does not prohibit it. For projects involving physical relocation of indigenous peoples, requires "broad support"</p>	<p> Seeks to avoid or minimise involuntary resettlement but does not prohibit it. However, requires "informed consent" for displacement of indigenous peoples or low-income ethnic minority communities in rural areas</p>	<p> Seeks to avoid or minimise involuntary resettlement but does not prohibit it. Requires determination of broad community support of indigenous peoples for relocation</p>	<p> Seeks to avoid or minimise involuntary resettlement but does not prohibit it. Requires meaningful consultations but not agreement</p>	<p> No specific provision</p>	<p> Does not prohibit involuntary resettlement but GEF will not finance the cost of physical relocation or displacement of people</p>

## 4) Recognition of indigenous peoples' rights

	UNFCCC	REDD+ SES v2	UN-REDD SEPC v3	UNDP	FAO
a) Respect and recognise statutory and customary rights of indigenous peoples to land, territories and resources	<p>✓ Calls for respect for the knowledge and rights of indigenous peoples and members of local communities, by taking into account relevant international obligations, national circumstances and laws, and noting that the UN General Assembly has adopted the UN Declaration on the Rights of Indigenous Peoples</p>	<p>✓ Recognises and respects both statutory and customary rights to lands, territories and resources which Indigenous Peoples or local communities have traditionally owned, occupied or otherwise used or acquired. Recognises and respects the human rights of indigenous peoples and local communities</p>	<p>✓ Respect and promote recognition and exercise of rights of indigenous peoples, local communities and other vulnerable and marginalised groups to land, territories and resources, including carbon. Respect and protect stakeholder rights in accordance with international obligations (including human rights, statutory and customary rights, and collective rights)</p>	<p>✓ Promotes the recognition of indigenous rights to lands, territories and resources and laws protecting indigenous lands. UNDP Human Rights policy recognises the rights of distinct peoples living in distinct regions to self-determined development and control of ancestral lands.</p>	<p>✓ Core principles of UNDRIP – self determination, development with identity, FPIC, participation and inclusion, rights over lands and other natural resources, cultural rights, collective rights, gender equality – form the basis of FAO's work in projects involving indigenous peoples</p>
b) Free, prior informed consent (FPIC) of indigenous peoples required for any activities affecting their rights to land, territories and resources	<p>✓ Calls for respect of indigenous peoples rights and international obligations, and notes adoption of UNDRIP</p>	<p>✓ Requires FPIC of indigenous peoples and local communities for any activities affecting their rights to lands, territories and resources</p>	<p>✓ Seek free, prior and informed consent of indigenous peoples and respect and uphold the decision taken (whether consent is given or withheld)</p>	<p>✓ UNDP promotes and supports right of indigenous peoples to FPIC in development planning that may affect them</p>	<p>✓ FAO follows UNDRIP and employs FPIC standard</p>
c) Respect and protect traditional knowledge and cultural heritage of indigenous peoples	<p>✓ Respect for the knowledge and rights of indigenous peoples and members of local communities, by taking into account relevant international obligations, national circumstances and laws, and noting that UN GA adopted UNDRIP</p>	<p>✓ FPIC is obtained for any use of traditional knowledge, innovations and practices of indigenous peoples and local communities</p>	<p>✓ Respect and protect traditional knowledge, and cultural heritage and practices</p>	<p>✓ No specific provision but covered by application of FPIC standard</p>	<p>✓ No specific provision but covered by application of FPIC standard</p>

**Legend**


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 Voluntary Guidance

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FCPF	WB	IDB	ADB	AfDB	FIP	GEF
 No general recognition of customary indigenous land and resource rights. Follows World Bank safeguards which address some but not all indigenous rights. Requires identification of land tenure issues in SESA but does not set standard regarding recognition of indigenous rights	 No general recognition of customary indigenous land and resource rights. Policies address some but not all indigenous rights. Requires attention to customary rights of indigenous peoples, but not recognition. Requires action plan for legal recognition of indigenous peoples' land rights if project involves acquisition of indigenous peoples' lands or is contingent on legal recognition	 No general recognition of customary indigenous land and resource rights. Policies address some but not all indigenous rights. Recognises indigenous peoples' rights according to "applicable legal norms" including national legislation and applicable international norms in force in each country. Operations must not negatively affect legal status, rights, possession, or management of indigenous peoples' lands	 No general recognition of customary indigenous land and resource rights. Policies address some but not all indigenous rights. Requires action plan for legal recognition of indigenous peoples' land rights if project involves acquisition of indigenous peoples' lands or is contingent on legal recognition	 No general recognition of customary indigenous land and resource rights. Policies address some but not all indigenous rights. No separate policy on indigenous peoples; indigenous people-related issues grouped under "vulnerable groups"	 No general recognition of customary indigenous land and resource rights. FIP programmes "should" catalyse and support acknowledgment of rights and role of indigenous peoples and local communities. Includes indicators on legally recognised tenure rights (but not a standard for achieving tenure)	 No general recognition of customary indigenous land and resource rights. GEF agencies are to "make provisions in plans, where appropriate, to support activities to establish" legal recognition of indigenous peoples' customary land tenure and collective rights
 Does not require FPIC. Requires "free prior informed consultation" [FPICon] resulting in "broad community" for all projects that affect indigenous peoples. Will follow FPIC standard in countries that have incorporated it into national legislation	 Does not require FPIC. Requires "free prior informed consultation" [FPICon] resulting in broad community support" as a financing condition for all projects that affect indigenous peoples. Requires FPICon at each stage.	 Does not require FPIC but does require good faith negotiations for projects with adverse impacts. For very high risk projects, requires verified agreements with affected IP communities	 Does not require FPIC. Requires "meaningful consultations." Requires broad community support (which ADB labels as FPIC) for community development of indigenous peoples' cultural resources and knowledge and natural resources on indigenous peoples' lands and for physical displacement	 Does not require FPIC. Requires meaningful consultations but not consent	 Does not require FPIC	 Does not require FPIC. Requires documentation that FPIC being followed in countries that have ratified ILO 169. Otherwise, agencies follow own procedures which must at least meet World Bank "free, prior, informed consultation, resulting in broad community support" standard
 No general provision to respect indigenous peoples' traditional knowledge and cultural heritage	 No general provision to respect indigenous peoples' traditional knowledge and cultural heritage. Requires prior agreement of indigenous peoples for "commercial development" of indigenous cultural resources and knowledge	 No general provision to respect indigenous peoples' traditional knowledge and cultural heritage. Requires prior agreement for "commercial development" of indigenous peoples' knowledge or cultural resources	 No general provision to respect indigenous peoples' traditional knowledge and cultural heritage. Requires only broad community support (not prior agreement) for "commercial development" of cultural resources and knowledge	 No general provision to respect indigenous peoples' traditional knowledge and cultural heritage. "Engagement process" shall respect the culture, knowledge and practices of vulnerable groups, especially indigenous peoples	 No general provision to respect indigenous peoples' traditional knowledge and cultural heritage	 No general provision to respect indigenous peoples' traditional knowledge and cultural heritage. Calls on agencies to "refrain" from utilising IP cultural resources or knowledge without prior agreement

## 5) Full and effective stakeholder participation

	UNFCCC	REDD+ SES v2	UN-REDD SEPC v3	UNDP	FAO
a) All stakeholders are able to participate fully and effectively in all stages of REDD+ programmes	<p>✓ The full and effective participation of relevant stakeholders, in particular indigenous peoples and local communities, in REDD+ actions</p>	<p>✓ All relevant rights holders and stakeholders participate fully and effectively in the REDD+ programme [participation defined as exercising meaningful influence, including FPIC]</p>	<p>✓ Ensure full and effective participation of relevant stakeholders in design, planning and implement., with particular attention to indigenous peoples, local communities and other vulnerable and marginalised groups</p>	<p>■ Requires stakeholder engagement. Plan scaled to severity of risks. Must consult affected stakeholders and respond to views. Emphasis on consult, rather than full and effective participation</p>	<p>✓ For high risk projects, stakeholders' participation will be ensured in designing, implementing, and monitoring avoidance and mitigation measures and compensation/benefits</p>
b) Stakeholders have timely access to relevant information, in accessible form and language	<p>■ Provide transparent, consistent, updated information that is accessible by all relevant stakeholders [from, Durban, 2.b, CP.17 Guidance]</p>	<p>✓ Rights holders and stakeholders have information needed, in culturally appropriate and timely way, and capacity to participate fully and effectively in design, implement and evaluation</p>	<p>✓ Ensure transparency and accessibility of information related to REDD+, including active dissemination among relevant stakeholders (incl appropriate language, form, and timing)</p>	<p>✓ Information Disclosure Policy provides broad access, somewhat limited exceptions, request system with process guarantees, an appeals process. EA guidelines stipulate that stakeholders to be provided information on purpose, nature, scale, and risks</p>	<p>✓ Requires timely provision of information on potential environmental/ social impacts and draft assessment documents to stakeholders, in accessible language and format. Consultation will be governed by FPIC</p>



**Legend**


 Binding Policies















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FCPF	WB	IDB	ADB	AfDB	FIP	GEF
<p> Requires stakeholder engagement in formulation and implementation stages. FCPF Guidelines on Stakeholder Engagement in REDD+ Readiness Preparation to be applied.</p>	<p> Requires consultations with affected groups and local non-governmental organisations. Emphasis on consultations rather than full and effective participation.</p>	<p> Requires consultations with affected groups. Emphasis on consultations rather than full and effective participation.</p>	<p> Requires "meaningful consultations" with affected people to facilitate their "informed participation."</p>	<p> Requires meaningful, transparent consultations to ensure free, prior, informed participation</p>	<p> Optional guidelines, programmes "should" be designed and implemented under process of public consultation, with full and effective participation of relevant stakeholders; optional consultation guidelines provided</p>	<p> Requires consultation, and participation "as appropriate". Minimum agency requirements include consultations. Emphasis on consultation rather than full and effective participation</p>
<p> FCPF Guidance on Disclosure of Information provides time-bound disclosure requirements. FCPF also subject to World Bank Access to Information Policy</p>	<p> World Bank Access to Information Policy provides broad access, somewhat limited exceptions, a request system with process guarantees, an appeals process. Various World Bank SGs require timely access to information in appropriate form and language</p>	<p> IDB Access to Information Policy provides broad access, somewhat limited exceptions, a request system with process guarantees, appeals. Safeguards policy requires timely access in appropriate form and language</p>	<p> Public Communications Policy provides for broad access, somewhat limited exceptions, request system with process guarantees, appeals process. Safeguards require timely access in appropriate form and language</p>	<p> AfDB Disclosure Policy provides broad access, somewhat limited exceptions, request system with process guarantees, limited appeals. Safeguards require timely access in appropriate form and language</p>	<p> Optional guidelines: affected communities "should" have prior access to information, "should" be in accessible form and language. Requires specific disclosures for draft investment strategies; final investment strategies, and programme/project documents</p>	<p> GEF Instrument requires all projects "provide for full disclosure of non-confidential information throughout the project cycle". Minimum agency standards require access to draft and final information, timely, in accessible form and language</p>

## 6) Transparent and effective governance

	UNFCCC	REDD+ SES v2	UN-REDD SEPC v3	UNDP	FAO
a) Promotes transparent and effective national forest governance	<p>✓ Promote and support transparent and effective national forest governance structures, taking into account national legislation and sovereignty</p>	<p>✓ Programme contributes to good governance, programme governance clearly defined, transparent and accountable, improves forest sector governance and other relevant sectors, includes institutional capacity strengthening and other measures to improve governance</p>	<p>✓ Apply norms of democratic governance, as reflected in national commitments and Multilateral Agreements; promote coordination, efficiency and effectiveness among all agencies/ implementation bodies, promote/ support rule of law, access to justice, effective remedies</p>	<p>■ Democratic governance is overarching strategic goal of UNDP programming. EA guidance requires assessment of adequacy of policy, legal, regulatory, and institutional frameworks relative to programmes. No specific forest governance standards proposed</p>	<p>✗ Requires capacity assessment and development of government and local institutions for high risk projects. Does not propose specific forest governance standards</p>
b) Complies with international obligations	<p>✓ Actions complement or are consistent with objectives of national forest programmes and relevant international conventions and agreements. Respect rights of indigenous peoples and local communities, by taking into account relevant international obligations, national circumstances and laws, and noting UNDRIP adoption</p>	<p>✓ Programme complies with applicable local and national laws and international treaties, conventions and other instruments</p>	<p>✓ Respect and protect stakeholder rights in accordance with international obligations (including human rights, statutory and customary rights, and collective rights)</p>	<p>■ Does not require compliance with all international obligations except for those under international environmental agreements</p>	<p>■ Does not require compliance with all international obligations except for those under international environmental agreements</p>
c) Stakeholders have access to effective local and/or national redress and grievance mechanisms	<p>✗ No specific provision</p>	<p>✓ Identifies and uses processes for effective resolution of grievance/ disputes, including disputes over rights to lands, territories and resources. Processes transparent, impartial, accessible</p>	<p>✓ Ensure legitimacy and accountability of all bodies representing stakeholders, including through responsive feedback and grievance mechanisms. Promote and support rule of law, access to justice, effective remedies</p>	<p>✓ Grievance mechanisms will be established to receive and facilitate resolution of the concerns/ grievances. Will be timely, transparent, culturally appropriate, and readily accessible at no cost</p>	<p>✓ Requires establishment of appropriate and accessible grievance mechanisms in high risk projects</p>
d) Stakeholders have access to independent funder accountability mechanism	<p>✗ No specific provision</p>	<p>✓ Can access relevant grievance mechanisms, includes grievances related to the operational procedures of relevant international agencies and/or international treaties, conventions or other instruments</p>	<p>✓ See above 6.c [presumes "all bodies" encompasses funders]</p>	<p>■ UNDP establishing accountability mechanism; in interim hiring safeguard expert to provide guidance on complaint handling and redress</p>	<p>■ FAO has proposing opening a stakeholder grievance and redress window in Office of Inspector General</p>

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
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FCPF	WB	IDB	ADB	AfDB	FIP	GEF
<p> Requires assessment of governance capacities and institutional gaps; encourages countries to use forest or other governance assessment framework consisting of principles and criteria for good forest and/or other relevant sector governance</p>	<p>■ Safeguards require analysis of institutional capacity and strengthening. Require access to info, participation, monitoring and financial integrity. Specific forest governance standards not specified. Forest Strategy includes actions to improve forest governance (not mandatory)</p>	<p>■ Requires analysis of institutional capacity and strengthening. For project/programmes requires access to information, participation, monitoring and financial integrity (specific forest governance standards not specified)</p>	<p>■ Requires analysis of institutional capacity and strengthening. For project/programmes requires access to information, participation, monitoring and financial integrity; specific forest governance standards not specified</p>	<p> Includes some general references regarding borrower capacity. For project/programmes requires access to information, participation, and monitoring, but specific forest governance standards not specified</p>	<p>■ Objectives include improving forest law enforcement and governance, including forest laws, policies, land tenure, and monitoring and verification, transparency and accountability. Forest governance criteria/ indicators “should” be integrated into design and performance assessments</p>	<p>■ Requires analysis of institutional capacity and strengthening. For project/programmes requires access to information, participation, monitoring and financial integrity (specific forest governance standards not specified)</p>
<p>■ Does not require compliance with all international obligations except for those under international environmental agreements</p>	<p>■ Does not require compliance with all international obligations except for those under international environmental agreements</p>	<p>■ Does not require compliance with all international obligations except for those under international environmental agreements</p>	<p> ADB will not “finance projects that do not comply with the host country’s social and environmental laws and regulations, including those laws implementing host country obligations under international law”</p>	<p> Does not require compliance with international obligations. Notes that safeguards, “where appropriate”, entail environmental/ social commitments arising from international agreements. Does not link financing to compliance with international environmental obligations</p>	<p> Does not require compliance with international obligations. Calls for consistency with decisions for REDD+ under the UNFCCC</p>	<p>■ Does not require compliance with all international obligations except for those under international environmental agreements and with ILO 169 where ratified No general requirement.</p>
<p> Ensure access to mechanisms for receiving, evaluating and addressing queries and grievances from stakeholders. Assist countries to develop, utilise, institutionalise effective in-country grievance/ accountability mechanisms</p>	<p> No general requirement. Projects that affect indigenous peoples or involve involuntary resettlement require establishment of grievance mechanisms / procedures.</p>	<p> No general requirement. Grievance mechanisms required in programs involving involuntary resettlement</p>	<p> Requires borrower to establish and maintain a grievance redress mechanism to receive and facilitate resolution of affected peoples concerns and grievances</p>	<p> Requires borrowers to establish credible, independent and empowered local grievance and redress mechs.</p>	<p> “Should” describe inclusive engagement process which “may” include the establishment of a conflict resolution mechanism where appropriate</p>	<p> Projects that affect indigenous peoples or involve involuntary resettlement require establishment of grievance mechanisms/ procedures.</p>
<p> Stakeholders have access to World Bank Inspection Panel (compliance review function)</p>	<p> Stakeholders have access to World Bank Inspection Panel (compliance review function)</p>	<p> Stakeholders have access to Independent Consultation and Investigation Mechanism (encompasses both problem solving and compliance review functions)</p>	<p> Stakeholders have access to ADB Accountability Mechanism (Special Project Facilitator/ Compliance Review Panel, encompasses both problem solving and compliance review functions)</p>	<p> Stakeholders have access to AfDB Independent Review Mechanism (encompasses both problem solving and compliance review functions)</p>	<p>■ No specific provision. However must be noted that all FIP funds channelled through MDBs and stakeholders have access to MDB accountability mechanisms</p>	<p> Access to Conflict Resolution Commissioner. Agencies to have acctblty systems or measures designed to ensure enforcement of environmental/social SG policies and related systems. Requires systems for receipt and timely response to complaints</p>

# Endnotes

- 1 UNFCCC 1/CP.16 The Cancun Agreements
- 2 Subsidiary Body for Scientific and Technological Advice
- 3 GEF, Global Environment Facility, Policy on Agency Minimum Standards on Environmental and Social Safeguards. 18 November 2011
- 4 Forest Carbon Partnership Facility: Common Approach for Environmental and Social Safeguards for Multiple Delivery Partners, FINAL. 9 June 2011, revised 10 August 2011
- 5 REDD+ Social and Environmental Standards <http://www.redd-standards.org/>
- 6 UN-REDD Social and Environmental Principles and Criteria, UNREDD/PB8/2012//1, 25-26 March 2012
- 7 Ibid.
- 8 <http://www.forestcarbonpartnership.org/fcp/node/301>
- 9 As of May 2012. FAO has been accepted as an FCPF Delivery Partner, but is not pursuing country programmes until the initial FCPF Common Approach pilot phase is completed.
- 10 In the FCPF Common Approach, "substantial equivalence with the material elements" of World Bank safeguards are considered a minimum requirement, however if a given agency has a higher standard, then the higher standard will apply.
- 11 COBA, REDD+ SES version 2
- 12 GEF, op cit.
- 13 See for example: FIP Design Document, FIP Investment Criteria, FIP Results Framework
- 14 See for example the FCPF RPP Template and the FIP Results Framework
- 15 1/CP.16, Annex 2.e
- 16 Defined largely as current/proposed protected areas and areas of high conservation value identified by authoritative sources. For full definition see for example: World Bank, OP 4.04, Annex A - Definitions
- 17 Defined as areas of native plant and animal species whose primary ecological functions have been largely unmodified by human activity
- 18 Such as the UN Declaration on the Rights of Indigenous Peoples (UNDRIP)
- 19 Only 20 countries have ratified the ILO Convention No 169 to date. The only African country is the Central African Republic (since 2010).
- 20 As of May 2012
- 21 Going forward, REDD+ SES will review adherence to the guidelines and foresees an option to include assessing performance against the requirements of the standards through independent verification.
- 22 UN-REDD Program SEPC: Supporting Document, March 2012
- 23 <http://www.bipindicators.net/>
- 24 <http://www.cbd.int/sp/targets/>
- 25 Forest Investment Program Design Document, 16 (g)
- 26 See also: International Law Principles for REDD+: The Rights of Indigenous Peoples and the Legal Obligations of REDD+ Actors, Indian Law Resource Center May 2012
- 27 Framework for Assessing and Monitoring Forest Governance, World Bank/FAO 2011
- 28 Draft Guidance for the Provision of Information on REDD+ Governance, UN-REDD, Chatham House 2011
- 29 <http://www.fao.org/forestry/acp-flegt/en/>
- 30 Governance of Forests Initiative Indicator Framework (Version 1), World Resources Institute 2009
- 31 UNEP/CBD/SBSTTA/16/8, Advice on the Application of relevant REDD+ Safeguards for Biodiversity, and on possible indicators and potential mechanisms to assess impacts of REDD+ measures on biodiversity, February 2012
- 32 Parallel reporting refers to the capacity of indigenous peoples to provide information on the implementation of safeguards in their lands and territories and to include their traditional knowledge into the feedback.

# GREENPEACE

Greenpeace is an independent global campaigning organisation that acts to change attitudes and behaviour, to protect and conserve the environment and to promote peace.

For more information contact:  
[pressdesk.int@greenpeace.org](mailto:pressdesk.int@greenpeace.org)

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**Greenpeace International**  
Ottho Heldringstraat 5  
1066 AZ Amsterdam  
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