

November 20, 2012

Comments from United Kingdom on the Investment Plan for Ghana

Dear Andrea

Please see attached the UK's comments on the FIP IP for Ghana.

Many thanks

Jane Higgins | Policy Analyst, Low Carbon Development and Adaptation Teams |
Climate and Environment Department
Department for International Development

The UK notes with thanks that comments raised by the FIP Sub-Committee in May 2011, and by the expert reviewer, have largely been addressed in the Investment Plan. In particular we welcome the strengthening of the project proposal on engagement with the Private Sector. We would like more work to be undertaken in the following areas:

Governance and co-ordination: arrangements for the oversight of FIP implementation, particularly around coordination between stakeholders, strategic decision making processes and monitoring progress against the results framework.

Risk assessments: a deeper analysis of the risk factors and extent of political will associated with a) implementing changes in tree tenure and benefit sharing and b) addressing the chainsaw milling informal private sector.

Benefit sharing: in Projects 1 and 2, "Reducing Pressure on Natural Forests through an Integrated Landscape Approach" and "Engaging Local Communities in REDD+/Enhancing Carbon Stocks", benefit sharing mechanisms around Community Resource Management (CREMA) systems in areas with significant in-migration will be particularly challenging. A thorough assessment should be carried out in the design phases.

GHG emissions: detail on reduction or avoidance potential, stronger assessments of the direct emissions savings of the lifetime of the proposed projects.

Cost-effectiveness: a stronger economic analysis to enable a better assessment of the cost effectiveness of the different options, from a GHG perspective. We welcome the commitment to conduct further analysis during project planning (including baselines). Cost-effectiveness needs to be calculated to reflect FIP impact / attribution.

Incentives: in Project 1, "Reducing Pressure on Natural Forests through an Integrated Landscape Approach", what are the incentives for change within the forest administration and how will the project address these?

Work with the informal sector: in project 3, "Engaging the Private sector in REDD+", it isn't clear if/how the project will engage with smaller and informal forest

enterprises, or how women entrepreneurs, significant traders in NTFPs for example, will be engaged with.

Gender: project 3, “Engaging the Private sector in REDD+”, is also gender neutral. An assessment of the extent to which female entrepreneurs might access funds and advice should be made in the project design phase.

Institutional sustainability: Project 1, “Reducing Pressure on Natural Forests through an Integrated Landscape Approach”, will promote a move to more decentralised forms of forest management and co-management. This raises questions about the institutional sustainability of such a mechanism beyond the lifetime of FIP which should be addressed in the project proposal.