

August 15, 2011

**Comments from Norway on the Approval by mail: Procedures for the Preparation of Independent Technical Reviews of FIP Investment Plans**

Colleagues:

Andreas is on holiday. So please indulge me regarding one question: It seems to me like the founding documents of the FIP (design document and follow up docs) are given a rather secondary role here to a long list of other (undoubtedly worthy) concerns. As you know, we remain concerned about diluting the FIP's focus – the design doc itself already is quite a compromise regarding the weighting between climate change mitigation and other concerns. It would seem to us that surely the main task of the reviews should be to evaluate whether the draft plans conform to the founding documents? Please enlighten me on your thinking on this – I will be only too happy to be notified that this is indeed your intent, or that I have misread the doc in some other way.

Thanks.  
Pharo Per Fredrik Ilsaas  
Ministry of Environment

August 26, 2011

**Comments from United Kingdom on the Approval by mail: Procedures for the Preparation of Independent Technical Reviews of FIP Investment Plans**

Dear Patricia

The UK supports the principle of an independent quality review, to assist the country-led preparation process of a high quality investment plan, and approves the revised document "Procedures for the Preparation of Independent Technical Reviews of FIP Investment Plans".

We would be grateful if you could clarify the following points:

Why has it has been decided to draw reviewers from the roster of experts established by the Forest Carbon Partnership Facility (FCPF)? Are we certain that this roster includes consultants with knowledge and experience of forestry investments?

Is paragraph 16 suggesting that the sub-committee would approve the terms of reference for every review, or for the proposed reviewers? We suggest the latter only, given that a model terms of reference, criteria and guidance are already included in this document, which should negate the need to return to the sub-committee for approval of the terms of reference for each review.

Best regards

Jane

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

August 26, 2011

**Comments from the Civil Society Observers on the Approval by mail: Procedures for the Preparation of Independent Technical Reviews of FIP Investment Plans**

Dear colleagues at the Admin Unit,

Thank you very much for giving us the opportunity to comment on the proposed independent review procedure for FIP Investment Plans. Attached please find joint comments from Bank Information Center, Forests Peoples Programme, Friends of the Earth US, Global Witness and Greenpeace.

We believe that our proposals would render the process more effective and hope that they will be taken into consideration.

Kind regards

Susanne Breitkopf  
Greenpeace

## COMMENTS ON PROCEDURES FOR THE PREPARATION OF INDEPENDENT TECHNICAL REVIEWS OF FIP INVESTMENT PLANS

### Submitted by:

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We agree that an independent review can add value to the design of Investment Plans and provide valuable information to Governments, MDBs and the members of the sub-committee and welcome the initiative. However, we do not think that the current proposal provides for a sufficiently independent review process. Overall, the MDBs and Pilot countries are assigned too many responsibilities in the process that will prevent the reviews from being independent.

As a result, we question the value that this review would add to the review procedures that the MDBs already have in place. As the document notes, already existing MDB procedures “include decision meetings (a formal management led review with participation of independent reviewers), quality enhancement reviews (informal meetings of independent reviewers and experts to discuss the plan), public disclosure and consultations, as well as multiple reviews of individual projects.”

An independent review process that would add value must in our view provide a robust independent assessment of whether proposed investment plans and projects meet the FIP objectives, principles and criteria in order to assist the Pilot Countries in designing high quality plans, but also to help inform the members of the sub-committee to determine whether the programs and projects can achieve the desired transformational results, as outlined in the Results Framework.

We therefore ask the Sub-Committee to consider the following modifications in order to bring the process closer to being an independent review:

#### Para 9.

In our view there needs to be a minimum of 3 reviewers in order to ensure a wide enough range of expertise in different areas. In order for the review to be independent, the reviewers should not be chosen by the respective ADBs and Governments whose performance they are reviewing. We propose the following wording for paragraph 9 of the proposal:

*“The review should be prepared by at least 3 reviewers selected from the roster (see paragraph 10) contingent on the skills required. The reviewers will be identified by the Admin Unit, with input from sub-committee members and observers early in the preparatory process of the investment plan. Sub-committee members and observers are invited to propose reviewers and to assist the Admin Unit in appointing a team. The Sub-Committee and the Pilot Country will be informed of the selected reviewers and able to express any objections within 5 working days. The review of the investment plan should be led by one of the selected experts who will serve as the team leader.”*

#### Para 13

See above. Suggested change:

*The Admin Unit, taking into consideration potential proposals from sub-committee members and observers, will select at least three expert reviewers contingent on the cost and skills required, including a team leader from amongst the selected reviewers inform the sub-committee, Pilot Country and MDBs of the selection.*

Para 14:

The Terms of reference should not be developed by the MDBs and the pilot country. Instead, a template based on the agreed FIP objectives, principles and criteria, using the indicators from the results framework, to be used by all reviewers should be developed in order to ensure consistency throughout FIP programs in different pilot countries. The Annex A + B to this proposal provide a good basis for such a template. The template in Annex C is still very vague and needs further detail.

Para 15/16:

The names of the proposed reviewers should be sent to the SC, including observers, and the Pilot Country at the same time. It does not appear necessary to add another layer here and ask the MDB committee to approve of the reviewers before the SC. As observers on the SC, the MDBs would have the same opportunity to express any objections or conflicts of interest about the reviewers as the SC members.

Para 18:

The Admin Unit, in consultation with the SC, should decide on the length of the appointment (not the MDBs).

Para 19c:

While it will be useful for the reviewers to discuss the review with the Pilot Country and the MDBs, it should be clarified that there is no obligation for the reviewers to change their independent findings as a result of these discussions. In reverse, if the SC agrees with the reviewers' recommendations, the Pilot Country and MDBs should be asked/requested to implement these.

Para 23/24:

Should be removed, as mentioned above, MDBs and Pilot Countries should not be responsible for choosing the reviewers and for crafting the ToRs.

Para 26:

The note prepared by the Pilot Country and MDBs should be made available on the FIP website together with the review. This should not be optional.

Para 29:

We do not consider it necessary/appropriate for the reviewed parties (Pilot countries and MDBs) to be able to deem an **independent** review "unsatisfactory". If at all, such an option should be given to the SC. The paragraph should be removed. However, the pilot country/MDBs will be able to provide a response to the review, explaining either their disagreement with the findings and/or the modifications they have made to the final draft Plan to address the review's conclusions (see also para 26).

Role of the Admin Unit:

As described above, the Admin Unit should appoint the review team with input/assistance from the SC including observers.

Annex A + B provide a reasonable basis for the review. The template in annex C should be further elaborated on the basis of the relevant FIP documents.

The expert roster should be subject to review by the SC on a regular basis. SC members and observers should be able to propose new experts to be included in the roster.

*August 30, 2011*