

## **Comments from the United Kingdom on the FIP Investment Plan for Congo Republic**

### **UK comments – detailed – Republic of Congo IP**

This is a well written and researched proposal, and one which is quite unique in that it links to other investment vehicles (CAFI). Having seen previous versions, it is good to see the integration of earlier feedback into the IP as it develops.

However the governance lens (i.e. continued reform and implementation of legislation and the rule of law e.g. the good work on the VPA) is perhaps still underestimated in the proposal, the role of the VPA process (including the mechanisms for ensuring stakeholder participation) needs to continue to be underscored. There is real potential to link the REDD+ and the VPA process through this overall investment plan

### **Governance/links to VPA-FLEGT**

**The implementation of outcome 1 of the Investment Plan should build on the great work RoC has been doing on VPA/FLEGT (as the first country to sign in Africa and considering good progress made over the past 18 months).** The VPA process has established a strong deliberation mechanism in Congo to guide its implementation based on the engagement of government, private sector and civil society representatives. This mechanism could be replicated for the implementation of outcome 1 focusing on governance to ensure better ownership from both state and non-state actors in critical reform processes.

The legislative reforms suggested under outcome 1 could benefit from the consultation mechanism which emerged through the VPA for the ongoing review of the Congolese forest code. Additionally, the coordination mechanism between the different government agencies for the VPA implementation could be used as a model for the implementation of the revised national territorial development plan (SNAT) also under outcome 1 and the improvement of the functioning of the bodies responsible for managing the implementation of the REDD+ process at different scales (CONA-REDD, CN-REDD, CODEPA-REDD and CACO-REDD+)

### **Specific points:**

Section 2.2 on Governance support is weak and should build on VPA achievements:

- Strengthened legality verification systems improving law enforcement and revenue generation in the forest sector
- Improved coordination between government agencies
- Increased transparency with information available in the public domain
- better representation and participation of forest sector stakeholders

Section 2.4 on the Green industrial agriculture programme includes reference to improving agro-industrial concession granting procedures. It can be directly associated with the verification of compliance in forest permit allocation as included in the VPA. The Ministry of Forests could support the Ministry of Agriculture in that respect. Unfortunately, this aspect is not reflected in the IP.

Transparency is mentioned in the title of Outcome 1 but hardly appears in the text. This topic should be considered from a strategic perspective as an entry point for stakeholder engagement and governance changes. **EFI** has done some work <http://www.euredd.efi.int/transparency>, and [Transparency International](#) too.

### **Gender, social inclusion and vulnerability:**

There is a section on gender and vulnerable groups, and there is a statement that approaches will be used to strengthen capacities etc. but there is little indication of how this will be done – e.g. **how socially excluded groups will be involved in the Land Use Planning process.**

**This needs to be enhanced and we expect to see this well developed in the project proposals.** For instance, in the cocoa value chain, what efforts will be made in relation to gender and work conditions (e.g. child labour, exploitation). In the fuelwood project, how will gender be considered in decision making, management and benefit sharing on community lands in relation to plantations? What are the gender considerations around improved charcoal?

**Good to see development of the DGM process alongside.** Would like to know the extent to which it will be designed to complement the FIP investment project areas or will take a broader approach.

**Safeguards and risks:** Land Use Planning needs to be inclusive and participatory, and build on other work that has been done, including related to Community Forestry (and participatory mapping)

Species used in the geographically integrated programmes, one in particular is a known invasive spp. Need to be clear which species are used, and that they will not lead to disturbance of ecosystem service delivery (e.g. water). How will species choice for plantation be decided?

The geographically integrated projects specifically mention SFM in concessions and protected areas, will logging take place in protected areas, or is this linked to the continued management of these protected areas?

There are risks associated with the promotion of cocoa. What measures will be put in place to ensure that no expansion takes place (into unsuitable areas) until the LUP is complete?

Where will the plantations take place for the fuelwood project, how will these be directed to the most appropriate areas?

**Risks:** Not really detailed enough, the risks of expansion into protected areas or primary forest is not recognised. Some of the mitigation actions are not detailed enough or targeted at the specific risk. The risk assessment is very high level. For the FIP projects there will need to be a specific risk assessment for each proposal but we would recommend a more detailed risk framework for the IP as a whole.

### **Other comments:**

**Given the importance of the protection of peatlands** we would have thought there would be more focus on these – recommend this is addressed in the next iteration

The IP and the geographic proposals **underestimate the role of Community forestry** and its potential to delivery sustainable forest management and contribute to sustainable agriculture production. The role and potential of Community Forestry should be developed further.

Not sure all of the **drivers of deforestation** have been identified, sectors such as illegal logging may have been underestimated.

The **Theory of Change** is basic and needs to be strengthened. The interlinkages between the differing outcomes and impacts are not clearly brought out. A clearer ToC would help to show how the geographic projects sit within the overall IP. The thinking in the ToC does not show the integrated nature of the interventions needed coming across as somewhat siloed. There are also no assumptions put forward.

For instance agriculture production improved by minimizing negative effects on forest ecosystems will contribute to Development co-benefits. Also the wording of this outcome is slightly confusing, as minimizing the negative effects of agriculture on forest ecosystems will not directly improve production, but improvements in efficiency of agriculture and increasing productivity in a sustainable way can reduce the impacts on forests.

The development of a **National Land Use Plan** will be an important element. It is proposed that this will be developed by consultants and at the centre, so how will the project make sure that this has good ownership at all levels and isn't pushed through quickly at the expense of consultation? How will it translate to the provinces and how will inputs from the districts and provinces where land use planning projects are already being piloted, feedback into the LUP?

By improving governance you will improve both the direct and indirect drivers of deforestation and degradation. The LUP plan has good potential to bring a range of stakeholders together. However this needs to be done in a participatory way. The process of developing the LUP is vital to achieve consensus and the buy-in of interested parties. It should also be an iterative process.

### **Comments on the project outlines:**

We recognise that these are still concept outlines – so comments here are for consideration as the projects go through design.

The 2 projects put forward for FIP funding are worthwhile, however given the geographical nature of the programs the security risks may have been underestimated. How confident is the government and the implementing entities that the projects will go ahead, and what mitigation factors are being put in place. Does operating in a more hostile environment require greater more stringent safeguards?

### **Agroforestry in degraded and non-forest areas in North Congo:**

How land is chosen on the ground according to its degraded status poses a risk, the cocoa should be shade grown so no more clearing takes place. How will this be ensured?

Sites need to be identified with adequate stakeholder participation including of vulnerable groups and with a gender lens.

Where will the nurseries be established and who will own them? How will sites be chosen? Are there opportunities for nurseries to be run as local businesses?

How will farmers know what the best agroforestry system is for their needs, what support will be given to allow them to make an effective choice?

No specific gender considerations are mentioned in the project concept. Are there other social inclusion issues to consider?

### **Community and fuelwood agroforestry in the departments of Pool and Plateaux**

Interesting project with the potential to have a significant impact, but what is the access to the market like? The DFID funded DRYAD project implemented by ICRAF in Cameroon has useful lesson learning on the establishment of community enterprises which would be useful for the FIP to learn from

Gender and vulnerable group dimensions will need to be given more consideration.

How will it be guaranteed that wood fuel generated from the project satisfies local needs rather than all being transported to Brazzaville?

Role of improved kilns, how will this be done and delivered? There is a lot of evidence of marginal gains from static improved kilns – versus well designed and managed traditional portable methods (where the trees are).