

# Independent Technical Review: Mongolia R-PP document

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UN-REDD PROGRAMME

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## **General comments to R-PP Document of Mongolia :**

**This R-PP is for Mongolia. Overall, the R-PP document seems to be well thought out and developed using a stakeholder consultation process. The steps indicated to develop a REDD+ Roadmap for implementation of REDD+ activities in Mongolia seem to have included the appropriate UNFCCC and IPCC guidance, Cancun safeguards and UN Conventions on rights and the necessity to develop guidelines and implement FPICs. The establishment of a national grievance mechanism for all REDD+ activities is also included in the roadmap which is an essential component of a new issue, in this case REDD+, carbon, rights, performance based payments etc. The activities listed in the workplan of each of the components will contribute to the development of a REDD+ Roadmap for Mongolia.**

**The capacity and resources of the Ministry of Environment and Green Development to implement the activities listed in the components of the REDD+ Roadmap must be realistically assessed before approval and start of the project and assistance to boost capacity must be included in the implementation plan.**

**The analysis linked with “Overemphasis on Conservation” is not substantial enough to be compatible with forest conservation strategies. It needs to be re-assessed and a proper impact assessment conducted prior to implementing this strategy. In most countries, to reach an adequate level of forest conservation is difficult and if it exists in one country, it may be important to assess its benefits prior to recommending change. A risk analysis should be able to highlight any possible unintended consequences.**

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## Assessing the draft R-PP against review criteria

### 1. Ownership of the Programme:

Mongolia has three development policies: MDGs-based Comprehensive National Development Strategy; National Security Concept of Mongolia; and National Strategy for Green Development (awaiting Parliamentary approval). It also has a number of environment policies that are relevant to REDD+. The establishment of a National REDD+ Task Force is a commitment towards ownership of the programme however it is (or will be) established through a Ministerial decree and therefore its permanence and long-term sustainability might be subject to uncertainty. The multi-sectoral nature of the Taskforce also is a positive step towards ownership.

The co-financing expressed by the Government of Mongolia of USD2M towards this programme also is an indication of their ownership of the programme.

### 2. Level of consultation, participation and engagement:

The steps highlighted in document to develop the programme and the steps that will be undertaken to develop the national strategy do seem to indicate some stakeholder consultation and participation has taken place. In course of the development of this Roadmap document a range of consultation and awareness raising activities on REDD+ between March 2011 and March 2012 using various methods and tools, including workshops, interviews, missions etc. However, based on the limited consultations that have taken place so far, the analysis presented under the heading Concerns about REDD+ Arising From Stakeholder Consultations seem to be too conclusive and not encompassing of other extremely important issues for REDD+ like land tenure, ownership, rights etc. Additional stakeholder consultations, not necessarily of new stakeholder groups but expanding participation of current stakeholder groups would be beneficial. Experience has shown involving affected communities in the design phase of a policy change is essential for effectiveness of a programme.

### 3. Programme effectiveness and cost efficiency :

The workplan and activities for each component seem to be sequentially logical and in line with the expected outcomes and outputs. However, the cost-effectiveness of spending money on changing policies, for example like forestry laws, seems counter-productive. 85% of forests are under protection and restrict access and use. The suggestion that these strict protection focused forest policies create incentives for illegal activities, may be accurate, however there is no economic or social analysis included to support action (and future impact) through this programme.

### 4. Management of risks and likelihood of success:

The assessment of risks identified as related to REDD+ implementation are categorized as low or medium. A risk that is not mentioned is what happens if the REDD+ Task Force does not receive the highest-level political support. Under regulatory risk "lack of stakeholder interest is identified" in the description which would be mitigated through a consultation and participation plan. This may not address the lack of stakeholder interest, as lack of REDD+ activities currently do not adversely impact on the daily lives of people and therefore changes are not actively sought especially in such a new area and concept as REDD+. This risk might be changed to high.

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5. Consistency with the UN-REDD Programme Strategy :

The programme is consistent with the UN-REDD Programme Strategy.

6. Compliance with UN-REDD Programme Rules of Procedure and Operational Guidance:

It is in compliance with the UN-REDD Programme Rules of Procedure and Operational Guidelines.

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## Assessing the draft R-PP by component

### 1. Component 1: Organize and consult:

Component 1 consists of three components: National REDD+ Readiness Management Arrangements; information Sharing and Early Dialogue with Key Stakeholders; and Consultation and Participation Process outlining the consultation process to be used during the formulation of the Roadmap and the requirement for future implementation of the strategy.

In this component it is extremely important to focus on the messaging on REDD+. REDD+ is an extremely complex issue that can be misrepresented or misunderstood at a sub-national and local level mostly related to rights. To avoid any confusion and delays in programme implementation related to this, it might be useful to conduct targeted focus group activities with a smaller audience to test messages both for public awareness and FPIC prior to full implementation of both.

### 2. Component 2: Prepare the REDD-plus Strategy:

Organized in four distinct sections this section elaborates the development of a national REDD+ Strategy taking into account the existing national situation and capacities, international requirements and national realities: Assessment of Land Use, Forest Law, Policy, Governance and Other Drivers; REDD+ Strategy Options; REDD+ Implementation and Safeguards Framework; and Compilation of the National REDD+ Strategy.

The argument under *Value of Forests and Financing the Forest Sector* on Increasing government spending on forests needs to be strengthened. The disconnect between revenue received from forests and the amount spent on forests could lead to over exploitation of natural resources and therefore needs to be well integrated into the REDD+ National Strategy. Additionally, a list of recommendations to enhance sustainable forest management financing is listed, but no analysis on their potential inclusion into a national strategy is included. A careful cost benefit analysis on “Overemphasis on Forest Conservation” vis. a vis. livelihoods and opening up protected areas would be useful to predict long-term impacts on biodiversity and reducing illegal activities. Capacity for enforcement also needs to be included adequately in the design of the programme. It might be useful to develop policies on how the fund created for REDD+ performance based payments will share the resources with provincial and local institutions and people. Will there be a need to accredit such institutions that could receive funding from the national fund and what types of capacity building will be required for these institutions to be able to receive funding.

### 3. Component 3: Develop a National Forest Reference Emission Level and/or a Forest Reference Level:

This section highlights the capacities, systems and activities required to develop national forest reference emission levels and/or forest reference levels. The key component for the development of the FRELS/FRLs will be a consistent methodology to ensure comparability with future FRELS/FRLs and transparency to ensure all stakeholders have access to the process and information used in the development of FRELS/FRLs.

It is not immediately clear which institution will be conducting FRELS/FRLs or which institution is responsible for choosing an appropriate institution to conduct the FRELS/FRLs. I assume it will be

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MEGD? The document does indicate that institutional arrangements will be finalized after a capacity assessment.

Assessing historical trends and assessment of national circumstances are two of the most complex and difficult activities in a REDD+ programme – adequate access to relevant, appropriate and current scientific methods and information must be reflected in the document to ensure accuracy of data to international standards.

4. Component 4: Design Systems for National Forest Monitoring and Information on Safeguards:

Component 4 is divided into 2 parts: National Forest Monitoring System; and Designing a system for safeguards, Multiple Benefits, Other Impacts and Governance. The objective of this section is for Mongolia to develop its national forest monitoring system in line with IPCC and UNFCCC guidance and modalities for REDD+.

The activities in 4a focus on designing systems for national forest monitoring do not seem to address social and environmental benefits of monitoring of carbon. There will be a number of GIS and web systems created using enhanced technologies including GIS and satellite mapping. A multi-purpose National Forest Inventory system will be recommended and will focus on aspects other than carbon, for example biodiversity, forest condition and socio-aspects of forest of forests resources however the role of stakeholders, CSOs and indigenous people in monitoring is not highlighted in this section of the document.

Overall, there does not seem to be adequate information on how to integrate the information from these activities into a national MRV system and NAMAs. It is inferred through Figure 9 but not explained in the text. Similarly a governance structure for monitoring, including independent monitoring, is not elaborated in the document. It seems to be a collection of different systems and processes that need to be brought together into one monitoring structure.

5. Component 5: Schedule and Budget:

Over a three-year period, Mongolia proposes to put in place its REDD+ management processes, complete its National REDD+ Strategy, and develop the capacities required to begin implementation of REDD+ for Phase 2. In designing its budget, special circumstances have been considered: vastely distances and remote areas will increase the cost of travel to and within Mongolia; and engaging international experts will be more expensive as there are not many living in Mongolia and therefore engaging international experts will incur higher costs.

Approximately 70% of the budget required to implement the Mongolia National REDD+ Roadmap will be from the government of Mongolia and UN-REDD Programme. The rest is confirmed through GIZ, UNEP, UNDP-TS, FAO-GEF project.

The UN-REDD Programme budget of USD3.78 seems to be evenly spread over the four components of the programme. A funding gap of USD1,86 million has been identified though there is no indication as to how this will be mobilized.

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6. Component 6: Design a Program Monitoring and Evaluation Framework :

The document has a detailed monitoring and evaluation framework with outcomes/outputs, indicators and means of verification. The RBM does not commit to a periodic internal tracking system against indicators. Also there seems to be no provision for an end of phase evaluation in neither the budget nor in the detailed results based framework. The programme will benefit from such evaluations.

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## **Suggestions for improving the technical design of the R-PP Document of Mongolia:**

The institutional structures for the various REDD+ mechanisms like the MRV institution, independent monitoring and integration with national NAMAs and MRV systems should be further detailed in the document. Although it is indicated that national institutional structures for REDD+ coordination will be developed through the implementation of the Roadmap, there is no reference to where these will be located or their independence status etc. Additionally it is a risk to place all the various structures within one Ministry. Some structures might be usefully placed in other instructions to more effectively mainstream REDD+ in Mongolia as well as a risk mitigation strategy.

It might also be useful to more fully explain the existing capacities of the MEGD as it has the full responsibility for REDD+ implementation in Mongolia.

The establishment of a broad-based multi-stakeholder National REDD+ Task Force is important however it must have high-level support and backing as the risk of it being marginalized otherwise is extremely high. Broadening of participation in the institutional structures proposed in Figure 5 will strengthen wider national ownership. Institutionalising reporting of the Task Force to the Cabinet will be an additional step towards mainstreaming REDD+ work in Mongolia.

The structure, policies and procedures for a national fund for REDD+ need to be described here. At the moment it is purely intended to receive performance based payments and make cash transfer however there is no provision for funding further projects and programmes that will lead to emissions reductions and conservation and enhancement of carbon stock as well as for multiple benefits. This might limit its future activities. Also, the point of this document seems to be to economize forests and the fund reflects this.