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| **Strengthening REDD+ Integrity at the Local Level** |
| UN-REDD Programme Policy Brief |
| Oct 2013 |

**Strengthening REDD+ Integrity at the Local Level**

**UN-REDD Programme Policy Brief**

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**Key Messages**

* With the advent of decentralization and devolution in many developing countries, the role of local governments in forest management has increased significantly. Improving local governance systems and investing in technical and human capacities at the local level could prepare local governments to manage REDD+ activities in a transparent and equitable manner.
* Local civil society organizations are critical actors in promoting REDD+ integrity. Their oversight is essential to making accountability measures included within REDD+ processes actually work, and they have a proven track record of local oversight. They are also active participants in local planning processes, and their advocacy for community benefits will be required as REDD+ project designs and implementation plans advance. However, it is equally important to address the capacity deficits that plague local CSOs just as they do local governments.
* Experience with existing forest and climate finance local level projects indicates that familiar modes of forest sector corruption, such as bribes, influence peddling, favoritism, fraud, and embezzlement, could also affect REDD+ at the local level. Hence, sensitizing local actors regarding REDD+ related risks and benefits and promoting transparency and financial disclosure at the local level remain important to mitigate potential corruption risks.
* Enhancing local actors’ access to information and knowledge regarding REDD+ and related governance concerns, including corruption risks, forms a foundation for REDD+ integrity. Indeed, considering the relative weaknesses in forest governance and capacity deficits commonly observed at the local level, there is a need to make sure transparency mechanisms and fiscal reporting requirements are robust enough to provide an enabling environment for local REDD+ integrity.
* In addition, substantial investment in local capacity enhancement will be required to build the technical and financial skills of local government employees and civil society groups needed to ensure competent local management and oversight of REDD+ activities.

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2. **Introduction**

As decentralization takes root in developing countries, local institutions—both local governments and local civil society organizations—are assuming greater responsibilities in local development, including land administration and forest management. Indeed, the significant role that local institutions play in approving, carrying out, and monitoring land use practices places them at the forefront of discussions related to climate change initiatives. However, when these expanded roles and authorities are not matched by the capacities needed to successfully carry them out, this has serious implications for local climate finance and REDD+ activities in general. Weak institutional checks and balances at the local level, for example, could open opportunities for elite capture and the abuse of discretionary power, increasing the risk of corruption in local decision-making, compliance, and financial transfers related to REDD+.

Concern about the corruption potential in REDD+ activities is not new, but most attention has been directed so far at the national level. Much less effort has been targeted at the local level, even though the risks of local-level corruption are arguably just as pressing and perhaps even more corrosive to the ultimate success of REDD+. If promised benefits do not reliably and equitably flow to local stakeholders, local support of and compliance with REDD+ schemes will quickly erode.

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| *Corruption is defined as ‘the misuse of entrusted power for private gain’.* *Local governance comprises a set of institutions, mechanisms and processes, through which citizens and their groups can articulate their interests and needs, mediate their differences and exercise their rights and obligations at the local level.**In public administration realm, integrity refers to “honesty” or “trustworthiness” in the discharge of official duties, serving as an antithesis to “corruption”[[1]](#footnote-1).* |

The discussion about REDD+ integrity has to happen within the context of the [Cancun Agreement](http://unfccc.int/files/meetings/cop_16/application/pdf/cop16_lca.pdf)s under the UN Framework Convention on Climate Change, which set out guidance and safeguards for policy approaches and positive incentives on issues relating to REDD+. One of the safeguards explicitly underscores the importance of transparent and effective national governance structure for REDD+[[2]](#footnote-2). [The UN Convention against Corruption (UNCAC)](http://www.unodc.org/unodc/en/treaties/CAC/), to which almost all UN REDD Partner countries are signatories, commits countries to combat corruption and promote integrity, accountability and proper management of public affairs and property. And, many of the UN member states including the UN REDD Partner countries identified integrity, transparency and accountability among core values or founding principles of public administration in their constitutions and relevant laws[[3]](#footnote-3).

Ultimately, the locus of REDD+ policy implementation and benefits delivery will be the local level, with local actors carrying out the majority of financial transfers. Thus, local processes and local institutions—local governance writ large—will play a large part in determining the integrity of REDD+ activities and their success at delivering community-level benefits. For example, local governments often oversee the assignment of rights to forest resources which will have a direct bearing on the manner in which sharing of benefits from REDD+ is managed. At the same time, local civil society organizations will act as essential partners in the oversight of REDD+ projects and financial transfers. Perhaps most importantly, the quality of local governance will determine the extent to which forest-dependent populations, such as indigenous peoples, can get involved in REDD+ planning and decision-making processes.

This Policy Brief explores the critical importance of local governance to REDD+ success and its key role in reducing REDD+ corruption risks. It draws from existing literature and the recent UN-REDD-led e-discussion on “Addressing REDD+ Corruption at the Local Level,” which was carried out in first quarter of 2013 and that gathered inputs from about 40 stakeholders[[4]](#footnote-4). The brief delineates the risks of corruption in REDD+ at the local level, drawing from current experience with climate finance in the forest sector. Based on this understanding of potential local corruption risks, it sets out a framework for formulating a structured set of response options designed to broadly increase the demand for transparency at the local level and specifically address local REDD+ corruption risks. Throughout, the brief attempts to forge a common understanding on ways to reduce corruption risks in REDD+ processes and advance cutting edge policy options for decision-makers to promote REDD+ integrity.

1. **The Promise and Challenge of Local REDD+ Governance**

The principle behind REDD+ holds that REDD+ initiatives, if carried out in a way that supports sustainable local economies, develops the capacity of local organizations, and respects the rights and priorities of forest-dependent communities, will bring social and economic benefits to rural communities while reducing forest-related carbon emissions and conserving forest resources. Experience with community-based forestry projects and other ecosystem management programs initiated at the local level lends support to this argument. When local institutions are engaged and communities are involved in planning and carrying out local forestry programs, these programs can become not only important sources of household income, but venues for community empowerment, cultural renewal, and collective action around common goals[[5]](#footnote-5).

Thus, one of the framing concepts of REDD+ has been the tenet that local beneficiaries must be active participants in local REDD+ governance if it is to succeed. This is certainly true when it comes to responding to REDD+ corruption risks and assuring REDD+ integrity. However, for this to occur requires the necessary capacities, access, and policy conditions to empower local institutions for action. Lack of information, resources, training or influence can hinder forest-dependent communities and local civil society organizations from effectively participating in decisions that shape the REDD+ agenda and programming, or from performing the watchdog role necessary to hold local authorities to account. Therefore, strengthening local governance systems—particularly by increasing both the demand for and supply of accountability—is of great relevance to REDD+ activities.

In fact, a focus on local REDD+ governance is especially important given the history of forest sector corruption. Many corrupt forest practices such as illegal logging and related illegal forest activities (such as pay-offs for logging permits, lax enforcement of harvest standards, or tax evasion through undercounting of harvested timber) are facilitated at the local level. Such practices and the culture of petty corruption in the forest sector have become endemic in many areas where REDD+ activities are expected, and, if not addressed, threaten to compromise the effectiveness, efficiency and equity of the REDD+ mechanism from the outset[[6]](#footnote-6).

**Local REDD+ Governance Challenges**

* History of forest sector corruption in many locations
* Capacity deficits in local institutions (both government and civil society)
* High potential for elite capture and diversion of benefits
* Citizens groups less organized and networked
* Limited presence of watchdog institutions and anti-corruption programming

Besides, REDD+ might offer new opportunities for corruption, since REDD+ necessarily involves difficult issues of land titles, carbon rights, technical Monitoring, Reporting, and Verification (MRV) procedures, and complex financial transfers, all of which will have local components. For instance, a recently completed REDD+ corruption risk assessment in the Philippines[[7]](#footnote-7) identified risks associated with local government units allowing illegal permits, contracts and plans as the second highest priority risk identified by national and local stakeholders. These issues will be critical in determining the size of local REDD+ revenues and the shape of benefits sharing programs, and in defining the beneficiaries involved. However, in cases where governance challenges exist at the local level, it could be more difficult to deal adequately with these concerns. For example, national-level oversight institutions such as anti-corruption bodies are far removed from village-level activities, and local citizen groups that can act as watchdogs are often less organized and empowered than national or urban-based groups. In the absence of such accountability mechanisms, the risks of local elites capturing revenues and benefits from REDD+ could be significant.

1. **Local Experience with Climate Finance**

**3.1 Governance Weaknesses and Capacity Deficits**

Experience with existing examples of climate finance and related forest sector projects tend to bear out the potential challenges of local REDD+ governance. In the recently concluded e-discussion on “addressing REDD+ corruption at the local level,” participants from civil society organizations, indigenous peoples, consultants, and UN agency staff in many different countries made it clear that considerable forest governance weaknesses and a lack of technical and human capacity plague the local level. Most commenters mentioned that petty corruption in the form of bribes and favoritism was commonplace at the local level of forest management, for example in the issuance of harvesting permits or other licenses.

The lack of local forest governance capacity and the inability to control local forest corruption is consistent with local governance studies in several countries in the “REDD readiness” phase of REDD planning and preparation. According to a 2013 Participatory Forest Governance and REDD+ Assessment in Indonesia, for example, “it is clear that many challenges related to sustainable forest management were not only caused by insufficient transparency and participation in land use planning and monitoring, or by failings in licensing processes, but also by problems inherent in local government agencies, such as insufficient human resources and capacities to deal with REDD+ planning and implementation coupled with insufficient accountability in decision-making”[[8]](#footnote-8). Meanwhile, a 2011 study of how local governments in Brazil and Bolivia have tackled corruption risks found that “although municipal governments have a role in forest administration and are in some cases better funded [than previously], they still lack the technical and human capacity to adequately tackle corruption.”[[9]](#footnote-9)

Commenters in the e-discussion noted that local corruption vulnerabilities are not confined to one particular aspect of climate/forest projects, but span the whole project cycle, from the initial planning decisions on site locations and project activities, to implementation and the management of local contractors, to project oversight and monitoring, to financial transfers and benefits sharing. Box 1 details some of the factors increasing the potential for forest-related corruption at the local level.

**Box 1. Factors Increasing the Potential for Forest-Related Corruption at the Local Level**

* + *Lack of clarity around resource ownership and/or carbon rights.* This is in many cases exacerbated by conflicts between statutory and customary laws on tenure and land administration. For example, in Ghana, landowners do not automatically hold ownership over the trees that grow on their land, meaning that there is often ambiguity that can be taken advantage of by government officials or enterprising individuals to dispossess local people of their forest resources.
	+ *Lack of acceptance of corrupt practices as wrong.* The recognition of corrupt practices by local people is by no means universal. In some communities, residents do not regard acceptance of in-kind support, influence, or monetary gifts as corrupt practices, but as legitimate forms of gift-giving or normal commerce.
	+ *Endemic poverty*, particularly of local civil servants, which increases the incentive for officials to engage in corrupt practices and abuse their authority to increase their net income.
	+ *Lack of easy access to relevant information* on local projects, planning processes, and expected benefits. Without such information, corrupt practices remain hard to detect by local citizens and civil society groups.
	+ *Lack of understanding of relevant forestry laws and rights* on the part of the community. Some of this stems from the high illiteracy rates common in rural areas in which forestry projects take place. But much of it stems from lack of outreach or public education on natural resource regulations or what good forest governance should look like.
	+ *Lack of accountability mechanisms,* such as systematic audits and independent monitoring and compliance protocols, which would reveal corrupt practices.
	+ *Lack of transparency* in local decision-making, budgeting, expenditures, and contracting practices, shielding what should be public procedures from public view.
	+ *Multiple and overlapping administrative authority*, making it difficult to manage forest resources without harassment: “For example, if I want a permit to cut a few trees in my farm, I am not sure who to approach between the Kenya Forestry Service, the Community Forest Association Officials, the provincial administration, the divisional environmental committee, the Administration police, the Kenya Police and Kenya Wildlife Service. Yet, as soon as I cut, each will want a bribe so as not to arrest me” (K. Sena, UNPFII).
	+ *A dearth of specific anti-corruption laws, policies, and mechanisms at the local level.* Most such laws and policies are targeted at the national level. Efforts to extend these policies to the local level are often hampered by poor coordination between central government authorities and local authorities.

Source: G. Mock. 2013. *Consolidated Summary: E-Discussion on Addressing REDD+ Corruption at the Local Level.* UN-REDD Programme and UNDP.

* 1. **The Role of Local Civil Society Organizations**

Local civil society groups have proved to be essential partners in climate-related projects to date (see Box 2).These groups undertake a variety of different activities, from oversight to public advocacy and education. Observers frequently cite the primary role of civil society groups in bringing oversight to the decision-making and MRV processes, and investigating and documenting abuses. For example, in Indonesia, a number of civil society organizations (CSOs) have established independent monitoring mechanisms, such as Forest Watch and Corruption Watch, to act as public watchdogs. As a result of their oversight capability, Indonesian CSOs often drive law enforcement issues in the forest sector[[10]](#footnote-10). Besides, CSOs in Indonesia and other REDD+ countries have also been quite involved in political and social mobilization, such as by promoting Free and Prior Informed Consent (FPIC) to make sure that climate adaptation and REDD+ projects proceed only after full consultation with communities; or in the crafting of REDD+ Safeguards, to minimize social and environmental impacts of forest projects and maximize their contribution to local livelihoods[[11]](#footnote-11).

Local CSOs such as community-based organizations can be effective in some advocacy roles, even though they tend to have small budgets and often have little access to the levers of power. The strength of such groups comes from being embedded in the local culture and conversant with local practices and norms, and therefore trusted at the community level, and able to catalyze local action. They can also be quite innovative, often fusing traditional approaches with modern practices or technologies to achieve their ends. This can be seen in the ready adoption by many community groups (after a minimum of training) of modern oversight methods using alternative media and networking.

However, in spite of the substantial contributions of local CSOs to climate finance and REDD+ planning to date, reports from the field make it clear that local CSOs’ access to participation in the full cycle of project planning, implementation, monitoring, and benefits sharing is still only partial. They might be consulted in the design stage, but not in the implementation stage, or their activity may be confined to monitoring a project that they were not involved in designing. In Nigeria, for example, CSOs were involved in the implementation and monitoring of the ‘[Building Nigeria’s Response to Climate Change](http://www.icarus.info/wp-content/uploads/2011/06/Woodley.pdf)’ project from 2007-2011, but they were not involved in its design, nor were they involved in independent oversight.

In other words, the current role of CSOs in activities similar to REDD+ projects is still limited; greater access and inclusion of CSOs in the full project cycle will be necessary to increase their contribution to REDD+ climate finance schemes. Also necessary will be a substantial commitment to CSO capacity development. Just as with local governments, capacity constraints are common among local civil society groups, which are usually volunteer organizations with limited training and severe funding constraints. Current experience shows that when capacity development for local CSOs is included as part of a climate project, it can be very effective.

**Box 2. Some Contributions of Local CSOs to the Integrity of Climate Finance Schemes**

Local CSOs have contributed in a range of ways to transparency and community engagement in climate/forest projects, as shown in the examples below. These examples are drawn from Transparency International’s [Climate Finance Integrity Programme](http://www.transparency.org/programmes/detail/cgip), in which TI Chapters in 9 countries have been working since 2010 on the issue of corruption as it relates to climate finance and REDD+.

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| **Country** | **Impact of CSO Involvement on Climate Finance Schemes** |
| Bangladesh | Mobilization of citizens—including youth and journalists—to do on-the-ground project monitoring |
| Mexico | Analysis by CSOs of Mexican CDM project documents revealed the extent—or lack—of public participation in these projects |
| Dominican Republic | Formal agreement negotiated with relevant government ministries to clarify the role of each ministry in climate-related projects |
| Indonesia | New social media platform created to monitor the implementation of the REDD+ forestry program |
| Vietnam | CSOs engaged with the media to strengthen the media’s capacity to educate the public on REDD+ safeguards and influence policymakers |

1. **Potential REDD+ Corruption Risks at the Local Level**

The experience with forest-related climate finance discussed above, combined with broader analyses of potential REDD+ governance issues, provide important insights on REDD+ corruption risks at the local level. Of course, it is difficult to clearly differentiate between “local,” “national,” or “provincial”-level corruption risks, since corruption often involves actors at different governance levels acting in concert. However, it is possible to identify corruption risks with a strong local angle that require participation of local officials or other local actors.

In general, evidence indicates that familiar forest corruption modes will remain a factor in REDD+, but these may be exacerbated by the newness of REDD+ processes, the technical challenges of MRV, and the scope of the benefits sharing task. Commenters in the local corruption e-discussion warned that REDD+ activities would be subject to common corrupt practices such as accepting bribes for permits/licenses; exercising favoritism in selection of sites, contractors, or beneficiaries; fraudulent monitoring and reporting of baselines, seedling survival rates, or other performance data; or embezzlement or diversion of REDD+ payments. However, there was a sense that several factors could elevate these risks, such as the high level of unfamiliarity with REDD+ benefits, rules, and regulatory mechanisms, and the great lack of transparency and financial disclosure at the local level.

Moreover, these risks are not confined to financial transfers, but extend into areas of land administration and tenure determination, MRV, the design of REDD+ projects and benefits sharing systems, and law enforcement, increasing the scope of corruption. For example, several commenters indicated that fraudulent documents related to the ownership of forest lands, the extent of concessions, and the granting of carbon credits would be an area of special concern that could highjack local REDD+ benefits. Also, the dependence of REDD+ schemes on accurate baseline forest data and performance reporting means that the MRV process is an area ripe for corruption. Table 1 capsulizes these observations, identifying five critical areas of REDD+ planning and implementation that show a high potential for corruption in which local actors are key players.

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| Table 1. Potential REDD+ Corruption Risks at the Local Level |
| Activity | **Corrupt Practice** | **Effect** |
| Land Use Planning and Project Design  | * Local planning officials influence the siting and/or design of projects to increase returns to select landowners, contractors, or concessionaires
 | Undermines community consultation process and therefore local support; may reduce the number of local beneficiaries and the magnitude of benefits; may result in conflicts with customary land uses  |
| Administration of Land and Carbon Rights | * Land administration officials create fraudulent land titles or fail to recognize the customary tenure of local indigenous groups or the legitimate land or resource rights of other local residents, granting title to local elites instead.
* Planning officials fraudulently create or register carbon rights in the name of local elites, or ignore competing claims to carbon rights by local groups or individuals
 | Disenfranchisement of many community members and marginalized groups, and accompanying loss of land use and REDD benefits.  |
| Monitoring, Reporting, and Verification (MRV) | * Project performance metrics, including carbon emission reductions, as well as local livelihood and social benefits, are intentionally measured or reported inaccurately to benefit land owner, project developer, contractor, or local participants
 | Reduced confidence in REDD+ performance by international carbon market and international development community may eventually lead to reduced REDD benefits  |
| Design and Implementation of Benefits Sharing Systems | * Local elites influence the designation of local beneficiaries and the design of how benefits will be distributed
* Local officials or organizations charged with benefits sharing embezzle or otherwise divert REDD+ funds
 | Disenfranchisement of legitimate beneficiaries; reduction in overall benefits delivered to target communities  |
| Enforcement of Regulations and Standards | * Local officials fail to conduct due diligence on project performance, benefits sharing, and illegal activities (e.g. illegal logging) that directly undermine REDD+ projects
* Local law enforcement fails to follow up on credible evidence of irregularities and fraud in REDD+ activities
 | Reduction in delivered benefits and consequent development gains; reduced confidence in REDD+ integrity by local communities, international donors, and carbon market investors |

1. **Building Local Governance Systems for REDD+ Integrity: A Framework for Action**

Enlisting local governance systems—including local government institutions, customary authorities, and civil society groups—to counter the risks of REDD+ corruption will require broad-based action on several fronts. Conceptually, this effort can be conceived in five distinct steps: Building local demand for REDD+ integrity; assessing local corruption risks in REDD+; ensuring an enabling environment for REDD+ integrity; developing local capacity for managing REDD+ corruption risks; and monitoring and evaluating REDD+ integrity at the local level. Below, we set out a framework that articulates these steps and recommends actions to achieve them.

***Step I - Build local demand for REDD+ integrity***

Build local demand for REDD+ integrity by:

* + Conveying the rationale of REDD+ and the scope of its local benefits.
	+ Increasing access to REDD+ planning, management, and monitoring information as a basis for community participation and oversight.
	+ Establishing the legitimacy of REDD+ decision-making processes and benefits distribution systems.

Only if local actors believe they have a real stake in a functioning REDD+ program are they likely to support local REDD+ projects and become active agents for REDD+ integrity. Thus, a basic understanding of how the program works and what benefits it will generate locally is essential to building community demand for REDD+ integrity. Also necessary is an appreciation of how easily REDD+ benefits can be jeopardized by corruption and how community vigilance can act to safeguard them.

Unfortunately, information on REDD+ benefits and processes is often difficult to obtain at the local level, reflective of more general difficulties with transparency and information access at the local government level. Without access to the salient details of REDD+ planning and expenditures, or to the performance standards and requirements for REDD+ projects, community members lack the knowledge they need to understand REDD+ activities, form reasonable expectations, and hold authorities accountable for performance and integrity.

At a deeper level, community acceptance of the need for integrity in REDD+ processes and decisions will depend on how much legitimacy they attribute to these. This legitimacy will derive from several factors, including how transparent the decisions are, how much local organizations and community members can participate in and affect the outcome of these decisions, how consistent these REDD+ processes are with local values and practices, and whether the benefits sharing system is seen as both credible and fair—that is, able to actually deliver substantial benefits on a reliable and equitable basis.

**Recommendation:** *Close the local information gap through targeted REDD+ awareness campaigns and freer access to REDD+ planning and project documents.*

Local REDD+ awareness is a foundation of REDD+ integrity. Awareness campaigns that allow people to understand what REDD+ is, what it means to their livelihoods, and what they should be able to expect from local officials in terms of their management of the program are the most basic tactic to raise REDD+ literacy and build local demand for good governance. The more local stakeholders understand REDD+ projects in simple and relevant terms, the greater will be their motivation to be involved. Besides promoting REDD+ integrity, such measures to sensitize and educate local stakeholders help also manage expectations.

**Box 3. Youth as a Target for REDD+ Awareness**

Programs aimed at young people, such as inclusion of corruption awareness in school curricula, can prove quite effective in terms of changing local attitudes about corruption. In Sub-Saharan Africa, for example, 60% of the population is under 35 years old. One innovative strategy reported by Transparency International and the UNDP Regional Centre in Senegal was a week-long “integrity camp” held for young people in December 2012 in Yamoussoukro, Cote d’Ivoire. The 38 participants form 6 countries in West Africa learned how to use information communication technologies (ICT) tools to promote integrity, and met with artists, journalists, lawyers, civil servants, and others to learn how to become agents of change in their communities.

Source: Kathrin Schraft. 2013. *West African youth leaders unite to fight corruption*. Transparency International.<http://blog.transparency.org/2013/01/29/west-african-youth-leaders-unite-to-fight-corruption/>

Also necessary is easy local access to planning documents, project budgets, contracts, project compliance reports, benefits sharing plans, and the array of other pertinent information describing the machinery of REDD+. The capacity of the local community to question local government on REDD+ management and the allocation of funds is one of the primary determinants of how much corruption will take root in REDD+ projects.

**Box 4. Vietnam’s Effort to Increase Access to Land Management Information**

Vietnam’s regulations on public access to local land management documents and decisions is an example of one government’s attempt to increase day-to-day availability to the kind of information necessary for local REDD+ oversight and advocacy. Vietnam’s disclosure regulations require provinces to make their land use regulations, permitting decisions, and transactions such as compensation for appropriated land more publicly available, especially on-line. Such on-line access empowers local people to track the ownership, management, and exploitation of local forest resources, including local REDD+ projects ([Source](http://siteresources.worldbank.org/INTVIETNAM/Resources/LandTransparencyReportEng.pdf)).

**Recommendation:** *Improve the local consultation process to ensure stakeholder participation throughout the planning and project cycle.*

Access to information must be matched with genuine consultation and access to the project planning cycle itself if local groups are to take ownership of REDD+ and demand a high standard of integrity. One of the greatest complaints of local CSOs involved in climate finance is that their participation is still partial—that it is neither early enough nor broad enough. Compared to many previous development processes, national REDD+ preparations have included a fairly high level of consultation with CSOs, but there still seems to be the sense among these groups that local control and significant community involvement in REDD+ activities are not foregone conclusions, and that an emphasis on facilitating local participation will have to be continually reinforced if local people are to be given the means and motivation to insist on REDD+ integrity.

***Step II - Assess local corruption risks and vulnerabilities in REDD+ processes***

Assess local corruption risks and vulnerabilities in REDD+ processes by:

* Mobilizing local actors to carry out a corruption risk assessment.
* Developing a corruption risk map to prioritize local governance responses.

Analysis of the particular vulnerabilities in local REDD+ governance is a good starting point in the effort to assure REDD+ integrity. A corruption risk assessment (CRA) is a proven diagnostic tool that can give much-needed guidance to anti-corruption efforts, helping to translate community demand for REDD+ integrity into action. The output of the CRA can then be used to construct a corruption risk map, that is, a matrix that compares the probability of a particular corrupt act with its likely impact. Such a map can be used to target local anti-corruption efforts, with those forms of local corruption that are both high-probability and high-impact being the highest priority for action. The output of this exercise will form the base for designing, implementing and monitoring the existence and effectiveness of specific anti-corruption measures at the local level and beyond.

**Recommendation:** *Support local CRAs through partnerships with local organizations to plan, conduct, and analyze assessment results.*

Successful CRAs have been carried out at the national level in several countries, demonstrating their usefulness as exercises to raise the profile of potential corruption risks and create momentum for anti-corruption programming. While national level assessments can produce findings relevant at the local level, an assessment that focuses more directly on the local forest sector may produce more useful data, with the result that anti-corruption efforts can be targeted more effectively. To have maximum relevance, the CRA effort should be organized around a local platform such as a working group that includes local organizations who can organize the assessment and determine its parameters. Support for the local CRA by partners in the national government, academia, the UN, or other international organizations could take the form of assistance in collecting and analyzing local data using CRA protocols recently developed by the UN-REDD Programme[[12]](#footnote-12).

***Step III - Ensure an enabling environment for REDD+ integrity***

Ensure an enabling environment for REDD+ integrity by:

* Devolving sufficient authority to the local level to empower local actors—both local government officials and civil society groups—to be active participants in REDD+ design, management, and oversight;
* Embedding robust transparency and accountability mechanisms in REDD+ processes;
* Clarifying forest ownership/tenure issues so that it is clear who is a legitimate REDD+ beneficiary;
* Adopting laws and processes to support genuine consultation, access to information, and redress.

For local REDD+ participation, activism, and oversight to occur, an enabling policy environment is required. The most critical enabling conditions are the empowerment of local actors; the presence of transparency and accountability mechanisms within the structure of REDD+; unambiguous possession of resource tenure and the right to a share in REDD benefits; and a basic infrastructure of laws ensuring access to information, participation, and redress.

***Local empowerment.*** If local governance systems are to be real players in REDD+, they must be empowered—functionally and legally—to do so. While decentralization has shifted new roles and responsibilities to local governments in many nations, this has not taken place uniformly, with the result that resource management authorities vary widely at the subnational level. In fact, in several countries participating in national REDD+ preparation and planning, authority over forest sector activities has yet to be devolved in a substantive way to the local level. If insufficient authority over REDD+ exists at the local level, it is doubtful that REDD+ can become the vehicle of community-driven development that its advocates had hoped, with a consequent diminishing of local buy-in, and reduction in local expectations for REDD integrity.

**Recommendation:** *Clarify—and, if necessary, expand—the specific role of local governments in REDD+ project planning, administration, and benefits sharing so that REDD+ accountability has a local home.*

The principle of subsidiarity (locating government authority over a service at the level closest to where the service is provided) has important implications for good governance of REDD+ projects. Involving local governments in land administration, project planning, or benefits sharing can have the beneficial effect of bringing accountability for REDD+ performance closer to home, increasing the program’s responsiveness to local concerns and increasing the incentive for local stakeholders to become involved.

**Recommendation:** *Legitimize the status of local civil society organizations and recognize their standing as local partners in REDD+ planning, implementation, and oversight.*

Local civil society groups need to be empowered as well; their involvement in REDD+ cannot be taken for granted. This involvement is predicated on the right of local groups to organize and act freely, without undue interference. Such “organizational rights” derive from the basic right of association, which underlies the ability of civil society groups to conceive and carry out a local agenda[[13]](#footnote-13). Specific government acknowledgement of the legal standing of local groups as REDD+ participants would reinforce this basic association right and facilitate their ability to meaningfully participate in REDD+ activities and oversight.

***Transparency and accountability mechanisms.*** To a great extent, REDD+ integrity will depend on the presence of appropriate transparency and accountability mechanisms within the structure of REDD+ implementation, financial transactions, and MRV activities. Even with an engaged public and willing local government institutions, such mechanisms are necessary to provide the basis for performance evaluations and the information necessary for public oversight. Now, as the design of national REDD+ systems and processes is starting to crystalize, is a good time to make sure these integrity mechanisms are included.

**Recommendation:** *Embed robust transparency requirements and accountability mechanisms within REDD+ administrative processes, financing mechanisms, and benefits sharing systems.*

Transparency requirements are one of the most obvious tools in the effort to increase access to REDD-related information at the local level. These can include on-line access to planning documents, payment data, contracting documents, compliance reports, and baseline data on forest conditions, as well as financial disclosure requirements for local officials to help identify conflicts of interest. Accountability mechanisms can include robust audit procedures and fiduciary safeguards, as well as MRV safeguards such as independent compliance officers and third-party monitoring.

Both local CSOs and central government authorities can play important roles in administering and acting on the results of these transparency and accountability mechanisms. As Box 6 shows, CSOs can be very effective in an oversight role when public policies are in place to make available the information they need. However, traditional top-down monitoring, such as audits by central government authorities, should also have an important place in holding REDD+ projects accountable. Some research shows that such traditional audits can be more effective in reducing local corruption than grassroots monitoring[[14]](#footnote-14).

**Box 6. Empowering CSO Oversight with Transparency Mechanisms**

The success of CSO oversight of public procurement in the Philippines is one example of how effective transparency mechanisms can be in combatting corruption. One of the salient features of the 2003 Public Procurement Act of the Philippines was that it empowered CSOs to monitor all stages of the procurement process, which led to greater transparency of these processes and better overall compliance with the law among procurement officials. [Brazil’s Transparency Portal](http://www.cgu.gov.br/english/AreaPrevencaoCorrupcao/AreasAtuacao/IncrementoPortal.asp) offers a similar example of how transparency can improve the sharing of benefits. The Transparency Portal makes public information on the expenditures of federal agencies, grants to NGOs, and social-welfare payments such as BolsaFamilia—information that CSOs, the media, and academia can use to examine the equity and effectiveness of benefits sharing. A citizen group called Open Accounts provides the local media with training on how to use the portal to uncover the misuse of public funds. At the same time, another CSO called the Public Spending Observatory sifts through portal data to look for suspicious patterns.

***Forest tenure and carbon rights.*** The ability to receive REDD+ benefits hinges on the question of forest ownership. Action to clarify forest tenure and carbon rights is necessary to insure that REDD+ benefits reach the intended recipients and prevent false ownership claims and mis-assignment of carbon rights—two potential forms of REDD+ fraud.

**Recommendation:** *As a precursor to decisions on REDD+ projects and benefits sharing systems, establish clear criteria for determining and officially registering forest ownership and carbon rights, and for resolving tenure disputes.*

Because of the centrality of the forest tenure question to the success of REDD+ and its potential vulnerability to fraud, the most common national policy reform suggested by participants in the recent e-discussion on local REDD+ corruption was clarifying local forest tenure rights. Of particular importance is the need to explicitly recognize the legitimacy of communal tenure, a form of forest ownership common among many indigenous groups who are likely REDD beneficiaries.

***Access rights, press freedom, and other fundamental protections.*** The effectiveness of REDD+ transparency and accountability mechanisms, as well as the ability of local stakeholders to participate in REDD+ planning, implementation, and oversight, will depend upon a legal infrastructure of basic rights such as freedom of information laws, press freedom, whistle-blower protections, participation rights, and grievance procedures. Only when these fundamental protections are in place are CSOs and other stakeholders truly empowered to participate in REDD+ processes and safely undertake REDD+ oversight. Enacting or preserving these fundamental rights is therefore essential to creating an enabling environment for REDD+ integrity.

***Step IV - Develop local capacity for managing REDD+ corruption risks***

Develop local capacity for managing REDD+ corruption risks by:

* Enhancing local government capacity to administer and implement REDD+ projects in a transparent and accountable manner.
* Strengthening local CSO capacity for community consultations, participation, and oversight.

As stated previously, capacity deficits in both local governments and local civil society organizations are a major obstacle to REDD+ integrity. On one hand, local government staff often lack the mandate and training to plan, budget, manage, and monitor local forest projects in a transparent and accountable fashion, or to investigate infractions and enforce rules. On the other hand, local civil society groups are often unprepared to participate in forest sector decision making in an informed and empowered manner, or are insufficiently trained to perform an independent oversight role.

**Recommendation:** *Provide technical training in financial and forest management skills to local government personnel, and encourage a culture of disclosure, including support for REDD+ transparency and accountability mechanisms.*

Technical training—in accepted financial accounting procedures, as well as forest management skills such as the ability to handle forest spatial data and other modern planning and forecasting techniques—is one part of the effort to raise the competency and standards of local government to bring professional and transparent management to REDD+ projects. But an equally important part is the acceptance by local officials—supported by performance incentives at the staff level—of the idea of transparency and a willingness to support the transparency and accountability measures embedded in REDD+ designs.

Also essential is a willingness and ability to contribute to local enforcement actions for infractions brought to light by local monitoring and accountability measures. Without effective enforcement, these accountability mechanisms mean little. While it is unlikely that REDD+ enforcement responsibility will be primarily a local matter, it is not unreasonable to think that local authorities will play some part. For this reason, some level of training in the kinds of environmental fraud and other illegal forest activities that may plague REDD+ projects may be appropriate.

Evidently, tackling corruption threats and promoting good governance at the local level cannot be isolated from national processes. Hence, efforts to develop the local capacities could include establishing coordination mechanisms that facilitates sharing of knowledge, expertise and practices between national and sub-national entities.

**Recommendation:** *Provide local CSOs technical training and mentoring in oversight techniques, advocacy, and the ability to substantively engage in project planning and design.*

Local CSOs have proven to be very resourceful in their ability to monitor on-the-ground conditions, rally public support, and make their voices heard. However, there is good evidence that capacity enhancement programs can improve the ability of these groups to make the best use of the rapidly changing data and public information environment, both for oversight purposes and to engage in a more substantive consultative capacity earlier in the project cycle.

Monitor and evaluate REDD+ integrity at the local level by:

* Enabling local stakeholders to obtain regular feedback on the progress being made towards REDD+ integrity.
* Applying social accountability tools to track and report performance related to REDD+ integrity at the local level.

**Box 8. Enhancing CSO Oversight and Monitoring Capacity in West Africa**

In 2011, some 100 civil society organizations in Benin, Burundi, and Mali took part in training workshops on corruption monitoring and oversight methods—part of a civil society support initiative cosponsored by UNDP, the World Bank, Observatoire de LutteContre la Corruption en AfriqueCentrale (OLCAC), Transparency International, and Integrity Action. The training courses, which could act as a model for REDD+, have included modules on international and regional conventions, the role of civil society in fighting corruption, monitoring and evaluation techniques at the community level, national legal frameworks, and budget cycles. To develop appropriately tailored course material, the initiative began with a quick desk review of anti-corruption efforts and civil society engagement in each of the countries, followed by needs assessments based on interviews with a sample of representative CSOs in each country. Results of the trainings to date include putting pressure on parliaments to pass anti-corruption legislation, improved cooperation between CSOs and government on anti-corruption measures, and greater participation of CSOs in the UNCAC process. One additional output of the initiative was the production of an assessment and training manual for civil society entitled [*Monitoring and reporting corruption: Participatory methods and tools for civil society organizations in Africa*](https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&ved=0CCwQFjAA&url=http%3A%2F%2Fwww.unredd.net%2Findex.php%3Foption%3Dcom_docman%26task%3Ddoc_download%26gid%3D9459%26Itemid%3D53&ei=ZvqAUtz-L7Ky4AOaooH4Dg&usg=AFQjCNFRWbYJMH2USnqr0U5imlwMQaE06Q&sig2=lF2FwIWWsUyXXqKA7xbtDA&bvm=bv.56146854,d.dmg)*.*

**Step V – Monitor and evaluate REDD+ integrity at the local level**

Incorporating monitoring and evaluation of local REDD+ integrity measures is a critical step of this framework. Among the obvious advantages are the ability to demonstrate the performance of these integrity measures; to contribute to continuous learning and accountability by closing the feedback loop; and to encourage a results-based culture. With better knowledge of what has and hasn’t worked in REDD+ integrity at the local level, it will be possible to extract, from past and on-going activities, relevant information that can subsequently be used as the basis for programmatic fine-tuning, reorientation and future planning. Without effective monitoring and evaluation, it would be impossible to judge if local organizations are succeeding in controlling corruption risks, whether claims of REDD+ integrity at local level could be possible, and how future efforts might be improved.

*Recommendation: Strengthen and institutionalize participatory monitoring and evaluation systems for REDD+ integrity*

This entails enabling local actors, including beneficiaries, to periodically analyze the extent to which REDD+ activities have actually been implemented with integrity at the local level. When this process of participatory monitoring and evaluation becomes institutionalized, it allows for those in charge of implementing the various REDD+ activities to be held accountable for their actions. Such a regular and continuous feedback mechanism can serve as an early warning system for identifying potential corruption or other unlawful actions related to REDD+ activities. This could contribute to building accountability and transparency in REDD+ processes from the bottom-up. The information understanding obtained as to why and how results were or were not achieved could be used to guide and adjust future REDD+ related planning processes as well as to inform safeguard information systems at the national and global levels.

*Recommendation: encourage the use of relevant social accountability tools to monitor and communicate information on REDD+ integrity*

There are a number of tools that can be used to track and monitor the performance of REDD+ activities against a locally-agreed up on integrity standard. These tools can be designed to be easily understood by the community-at-large. For instance, community-based forest monitoring tools like Community Carbon Accounting not only help enrich the data used for estimating carbon stock changes and increase transparency, but also empower communities and enhance the sustainability of REDD+ activities[[15]](#footnote-15).

1. **Conclusion**

With a consistent effort to address local REDD+ governance issues along the lines sketched out above, REDD+ offers a route to improve forest governance as a whole, and in the process to serve the development interests of forest-dependent communities. On the other hand, neglecting the potential vulnerabilities of local REDD+ governance and the need to raise capacity and awareness around REDD+ issues at the community level will likely further degrade forest governance as new opportunities for forest corruption come to the fore. The economic, social, and environmental benefits that can accrue to communities through REDD+ can provide a substantial incentive for community members to take REDD+ projects seriously, become involved in their management and oversight, and insist on their integrity. But this will only occur if local stakeholders are empowered and inspired to do so.

Tackling corruption threats and promoting good governance at the local level cannot be isolated from the larger multi-level governance system through which REDD+ will be implemented. Thus, the observations and recommendations in this Policy Brief are not intended to stand alone, but to be incorporated into an integrated, multi-level approach to REDD+ integrity. Ultimately, success with the local prescriptions outlined here will depend on upstream work at the national level to mainstream REDD+ into national development plans, craft guidance on anti-corruption programming at the national and local levels, and forge an enabling policy environment that incorporates appropriate transparency and accountability mechanisms into REDD+ processes at every level.

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