

**Section 1: ADVANCING INDIGENOUS AND COMMUNITY RIGHTS TO LAND AND FORESTS:** To what extent does the proposed emission reduction program protect and advance the rights of indigenous peoples and local communities to land and forests within REDD+ systems and processes?

**1) Stakeholder participation in Emission Reductions Program Idea Note (ERPIN, April 2014) planning and Emission Reductions Program Document (ER-PD, January 2016) design**

Grade	Indicator	ER-PIN Assessment
	1a) The ER-PIN design process shows evidence of full and effective engagement of locally affected populations and vulnerable groups, including women, indigenous peoples and local communities	<p>The participation of the Congolese civil society should happen through a platform called Climate REDD+ (GTCR from French). According to FCPF DRC National Strategy Framework Appendices the GTCR participated actively in the ER-PIN development and continues to be the main platform to be used for consultation of civil society by the government<sup>i</sup>. Nevertheless, organizations working in the field also note that consultation with local stakeholders in the project area has been limited, and few are well-informed about the project and its potential implications and that, currently, GTCR has suffered from some serious internal conflicts that have limited its effectiveness, although support from UNREDD to strengthen the platform are bearing fruit..<sup>ii</sup> Furthermore, according to external observers, although the GTCR participated in the ER-PIN process, the time allocated for civil society to validate the ER-PIN was very short (5 days).<sup>iii</sup></p> <p>The ERPD self-assesses stakeholder commitment as well-addressed (ERPD, p. 195), but provides an overly broad description of consultations (ERPD, p. 204). It remains unclear who were the involved participants, but also if their inputs reflect local concerns and how they will be applied in the ERP. Furthermore, the ERPD also restates the importance of the GTCR (ERPD, p. 145; 150; 182), but does not describe any progress on its functioning.</p>
	1b) The ER-PIN presents a clear and realistic approach for ensuring IP/LC involvement in the design and implementation of the full ER Program	<p>The ER-PIN states that a thorough study will be done during the design phase to identify indigenous peoples in the proposed ER Program area, and the empowerment of women is pointed to as a particular need (ER-PIN, p.37). Still, it remains unclear how vulnerable groups are being fully engaged in the process.</p> <p>The ERPD does not describe advances on the identification of IPs and states the contractual negotiation process with clan chiefs and communities (ERPD, p. 65) is not a concern (ERPD, p. 65). Still, it only describes that representatives were elected through a verbal process (ERPD, p. 73). Furthermore, it states the “provincial steering committee has been strengthened, with real decision-making and control powers” (ERPD, p. 75), but does not describe how.</p>

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**2) Land and forest tenure**

Grade	Indicator	ER-PIN Assessment
	2a) Robust tenure assessments in the geographical area of the proposed ER Program were conducted as part of the SESA	<p>No robust land and resource tenure assessments in the geographical area were conducted as part of the SESA. The SESA report recognizes gaps in the process and the need for additional funding to complete analytical work (SESA, p.58).</p> <p>No progress is seen in the ERPD regarding land and resources tenure, despite stating that several independent studies were carried out and giving a vague description of tenure in the country (ERPD, p. 64). An EIA report also deems risky to advance with land and forest tenure reform, considering the insufficiency of available data on the matter and current institutional arrangements<sup>iv</sup>.</p>
	2b) Land and resource tenure assessments were publically vetted and endorsed by all concerned stakeholders;	<p>Although the ER-PIN presents a self-assessment of the land tenure criteria as complete (ER-PIN, p. 71), it does not present a tenure section or stakeholder input on the matter. The ERPD provide a more detailed description of the overall tenure context, but also does not present stakeholder feedback. It also highlights that contractual integration of customary landholders is a challenge to the program (ERPD, p. 59), but only go as far as stating that stakeholders will be engaged through “voluntary participation” in the assessed area (ERPD, p. 68).</p>
	2c) The land use / land tenure context of the proposed ER Program, including implementation risks (conflicting claims) and available arbitration processes is well defined.	<p>The ER-PIN mentions that a mechanism for the management of grievances specific to REDD+ is being developed at the national level and that a similar grievance mechanism will be developed at the program level.<sup>vi</sup></p> <p>The ERPD states vaguely that conflicts related to tenure will be better solved with consultation mechanisms and land use participatory approaches (ERPD, p. 48). It also affirms that general guidelines for the Feedback and Grievance Redress Mechanism (FGRM) were already proposed in the SESA, but it still needs refinement and it has not yet gone operational (ERPD, p. 172).</p>

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<p>2d) The process for addressing emerging land and forest tenure issues (e.g., conflicting claims, tenure insecurity for IP/LC and women) is clearly defined in the ER-PIN</p>	<p>The government recognizes that in DRC the tenure situation is very complex and at the center of several conflicts.<sup>vii</sup> The geographic distribution of land concessions and protected areas, as well as the boundaries, access and use rights of local communities are not clear, and many rights overlap. There have been some efforts of identifying these boundaries, for example, WRI's and Moabi's interactive maps for DRC. Nevertheless, in the ER-PIN and associated documents there is no description of how these overlaps and potential conflicts would be treated during ER program implementation.</p> <p>The ERPD reiterates solutions will be based on voluntary participation of stakeholders and will include long-term planning (ERPD, p. 68). Still, considering the weight of challenges imposed to the program, such as recurrent conflicts between local communities and concession holders or the lack of boundaries among clans (ERPD, pp. 69-70), proposed actions seem somewhat vague. Furthermore, the integrated REDD+ approach (ERPD, p. 70) the ERP proposes will only be viable with a detailed analysis of tenure situation in the geographical area of the program. The planned complementary investments articulated in the National REDD+ Investment Plan in land tenure, land use planning, forest governance and sustainable forest management through the recently agreed Letter of Intent under the Central Africa Forest Initiative create hopes for major reforms and improved performance in these areas, but are not yet well described and their sequencing with the ER program is unclear.</p>
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**3) Assignment of rights to forest carbon**

Grade	Indicator	ER-PIN Assessment
	3a) The legal framework for carbon rights is defined in the ER-PIN	<p>DRC legislation does not provide a clear structure for how the various rights to forest – both formal and customary - relate to forest carbon ‘ownership’, nor how overlaps would be treated in terms of income from REDD projects. This is therefore an aspect of ‘REDD-readiness’ which would need to be addressed.<sup>viii</sup></p> <p>Despite the recognition of carbon rights, the ERPD presents general principles of how these rights will be dealt in the ERP (ERPD, p. 66-68). The description, however, is somehow unclear and raises concerns. It seems the scheme favors the ownership of these rights to government and project holders with signed contracts to sell carbon, preventing credit from other forms of legal basis. The scheme seems worrisome, especially regarding benefit-sharing<sup>ix</sup>.</p>
	3b) The process for dealing with contested and/or overlapping land, forest and carbon claims is defined.	<p>The ER-PIN does not describe specific mechanisms for dealing with these issues. In the future, claims related to land, forest and carbon rights could be dealt with within the proposed Feedback and Grievance Redress Mechanism (FGRM), but as explained in the ERPD, it is still an ongoing process (ERPD, p. 172). The ERPD further describes alternatives such as filing complaints in the National Registry to be addressed by administrative and judiciary institutions (ERPD, pp. 172-173), however these processes could take a lot of time, and the capacity of the DRC judicial system for dealing with contested land and carbon rights could be questioned<sup>x</sup>.</p>
	3c) The legal basis for the transfer of ER titles is defined.	<p>The transfer of ER titles was not defined in the ER-PIN. The ERPD says carbon rights do not have specific provisions in the country's legislation (ERPD, p. 66) nor legal basis for implementation (ERPD, p. 68). The ERPD indicates state owns all carbon, endowing itself with transfer rights<sup>xi</sup>, but the registry system itself still seems unclear (ERPD, p. 67).</p>

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**4) Equitable benefit sharing and non-carbon benefits**

Grade	Indicator	ER-PIN Assessment
	4a) The ER-PIN presents a transparent and verifiable process to equitably share carbon-related benefits (e.g., REDD+ revenue streams).	<p>The ER-PIN contains a description of the benefit-sharing arrangements for the ER Program. Within the development of the ER program in the Mai-Ndombe region, national guidelines are to be made through consultation processes addressing several matters such as the percentage of credits going to small scale activities including local communities, among other issues<sup>xii</sup>.</p> <p>The benefit-sharing mechanism is not yet operational, but the ERPD presents further details, distinguishing types of beneficiaries and benefit-sharing sub-contracts (ERPD, p. 177-178). Proposed arrangements however raise concerns over implementation contracts. They do not foresee emission reduction credits to stakeholders without legal titles, risking communities to the entitlement of only non-carbon benefits that may or not be generated.</p>
	4b) The ER-PIN presents a transparent and verifiable process to prioritize and equitably share non-carbon benefits (e.g., alternative business models and revenue streams).	<p>According to the ER-PIN (p. 43), the benefit sharing model will be implemented on a pay-for-performance basis, that being emission reduction and related proxies. There will also be a fund reserve for contributions to the program itself. The National REDD+ Fund will be responsible for the management and distribution of the revenues from the ER. Fiduciary management of REDD+ Fund has been transferred to the UNDP/MPTF, as an administrative agent. Monitoring and management of the program itself will include involvement and training of indigenous and local communities through a network system related to the MRV program.</p> <p>The SESA specifies the decentralization of benefits from the national to the provincial level. But the proposed benefit sharing ratio was contested during the consultation process, and it remains unclear how revenues are to be channeled down to local communities at the provincial level or how benefit distribution will take into account the complex land and resource tenure situation on the ground.</p> <p>The ERPD says that non-carbon benefit will play a bigger role on benefit-sharing mechanism, and might even surpass as incentives to reduce deforestation and degradation (ERPD, p. 178), by eliminating cash constraints. Described non-carbon benefits (ERPD, p. 183-186) are of major importance to local communities and IPs, but as stated in section 4b, the arrangements on implementation contracts risk restrict access by communities to ERP benefits.</p>
	4c) The benefit sharing mechanisms outlined in the ER-PIN are broadly supported by indigenous and forest dependent communities, including women.	<p>Principles for benefit sharing contained in the ER-PIN were approved by stakeholders in consultation processes, and the mechanism also foresees support for vulnerable communities through a system of advance payments (ER-PIN, p.45). The ERPD says the benefit-sharing arrangements is a product of discussions among stakeholders (ERPD, p. 175), but does not detail these discussions.</p>

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**5) Alignment of ERP strategies with main drivers of deforestation**

Grade	Indicator	ER-PIN Assessment
	5a) The drivers of deforestation and forest degradation identified in the ER-PIN are consistent with expert analyses and local stakeholder input.	<p>No. A summary of deforestation drivers is presented in the ER-PIN followed by activities proposed for the ER-Program (ER-PIN, pp 12-17). Other observers and analyses, however, have questioned the conclusions of the ER-PIN<sup>xiii</sup>. It also raises questions about unlisted potential causes, such as land tenure insecurity, poor governance of forest resources, corruption, among others. The ER-PIN does admit that there was no full or adequate assessment of the drivers at the provincial scale.<sup>xiv</sup> It assumes that the identified drivers and underlying causes would reflect the national situation. This view is questioned by some analysts, who argue that the causes of deforestation may differ from area to area<sup>xv</sup>, and the drivers are not discussed with geographical precision.</p> <p>The ERPD describes deforestation and forest degradation drivers with further depth, but does not relate those results with stakeholder input (ERPD, pp. 38-40). This seems to be especially odd, considering how the major deforestation driver is considered slash and burn agriculture, leaving the impression that most of the program would deeply influence local communities and IPs livelihoods.</p>
	5b) Challenges to overcoming identified drivers (i.e., technical, institutional, political or economic) are clearly defined.	<p>The ER-PIN (ER-PIN, p. 18) and the ERPD (ERPD, p. 46) identify some barriers to overcoming drivers such as land tenure, lack of financing and poverty. Still, they are not described with much detail and proposed solutions are simplistic (ERPD, p. 46).</p>
	5c) Proposed ER Program interventions specifically target the main drivers and their related challenges.	<p>ER-PIN does propose some interventions. Nevertheless, FPP claims that the proposed actions to reduce deforestation could have adverse impacts on local community livelihoods, in particular those actions related to small-scale agricultural expansion, charcoal production and mining. For example, the ER-PIN proposes to combat illegal charcoal production by small charcoal producer groups through an ‘alternative livelihood’ eco-charcoal program.<sup>xvi</sup> According to FPP, beyond an underestimation of the difficulties to implement an alternative eco-charcoal production, “even if successful, the replacement of small-scale artisanal charcoal production by larger-scale organized production could have negative impacts on the livelihoods of many thousands of poor people.”<sup>xvii</sup></p> <p>The ERPD does describe interventions linked to drivers with more detail, but EIA says proposed solutions do not relate to the scale of the problem and some of them are risky<sup>xviii</sup>.</p>

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**6) Safeguards framework**

Grade	Indicator	ER-PIN Assessment
	6a) The country has completed its SESA and elaborated an ESMF (yes/no; if yes then consider b through e; if no, got to 6f)	<b>Yes, Yes</b>
	6b) The assessment of social and environmental considerations was conducted in a transparent and participatory manner.	Both documents are available on the FCPF website. Stakeholder consultations were divided in three layers, including government officials in charge of the national REDD+ strategy, thematic coordination members; and those not directly involved, such as other line ministries; and local and indigenous communities. The consultations were held over 40 days in 2012 within six main provinces, collecting views of indigenous and local communities that allowed the elaboration of a first version of the SESA. Further consultations allowed the improvement of the SESA and resulted in a series of documents to address identified issues with more specificity (SESA, p. 246)
	6c) FPIC is presented as a requirement of the ESMF.	As of the time of SESA, there was no proper framework or methodological guide for implementing FPIC processes and the timeline or steps for a legislation reform remain unclear (SESA, p.57). FPIC was included in the ERPD as a safeguard to be integrated with the ERP and the ERPD says it is a required principle for activities concerning community land rights or agreements (ERPD, p. 170; 179). How these processes will be carried out, however, remains unclear <sup>xix</sup> .
	6d) The EMSF identifies key steps, including budget and timeline, to strengthen forest governance issues within the national legal framework	<p>Although the ESMF presents recommendations for complying with WB's OPs, it does not describe a timeline to do so (ESMF, p.34). The ESMF does not have a summarized budget for the implementation of the ERP, but does present budget for implementation of the ESMF itself (ESMF, p. 14) and other expenses related to social and environmental management (ESMF, pp. 85-86)</p> <p>The ERPD presents some indicators on governance (ERPD, p. 198), but does not link governance issues with problematic aspects of the ERP, such as tenure or tackling deforestation drivers.</p>

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	<p>6e) The ER-PIN presence a credible grievance/dispute resolution mechanism, based on the FGRM assessment.</p>	<p>With reference to grievances and conflict management it is suggested that efforts are first made to resolve disputes amicably. In cases of persisting conflicts, a mediation system would need to be established (SESA, p250).</p> <p>As stated in section 2d, the Feedback and Grievance Redress Mechanism (FGRM) still needs refinement is not operational.</p>
	<p>6f) The ER-PIN describes the design of the Safeguard Information System and its application in the context of the ER-P.</p>	<p>At the time of the ER-PIN, the Safeguard Information System (SIS) was under development at the national level, with a jurisdictional-scale system for monitoring the safeguards. The ESMF stated that an information system was being established in partnership with the Ministry of Finance, to report fund flow and general program performance. A broad scheme is presented in the document (ESMF, p.80). Finally, the ERPD states that a Safeguards Information System is operational and integrated into the registry (ERPD, p. 197). It says it still needs capacity building workshops to be implemented, however (ERPD, p. 171).</p>
	<p>6g) Proposed safeguards adequately address the land and resource rights of indigenous peoples, forest communities and women</p>	<p>The ERP presents some landmarks on safeguards, such as the efforts to embed FPIC processes in the ERP and the completion of the SESA and the ESMF. Consultations held for the SESA are also an important guide to implement the safeguards principles (ESMF, p. 31; See also SESA, Annex VII). Still, as stated in section 6c, the capacity to implement FPIC is uncertain, land planning and mapping requires further development (section 2)<sup>xx</sup>, and the feedback and grievance system is not operational, what endangers IP's and local communities rights to land and resources, or even their participation in the ERP.</p>



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**Section 2: BROADER GOVERNANCE CHALLENGES FOR ADDRESSING DEFORESTATION DRIVERS:** To what extent does the proposed emission reduction program consider other key forest governance challenges for achieving REDD+?

**7) Government capacity and coordination in ERP planning and implementation**

Grade	Indicator	ER-PIN Assessment
	7a) The ER-PIN shows evidence of coordination across sectors, line ministries, and levels of government (local, sub-national, national).	<p>The ER Program Management Structure is described within the ER-PIN as a draft concept (ER-PIN, p.26-27). The alignment of the ER program with the National REDD+ Strategy, as stated in the ER-PIN, is further detailed in the R-PP and the National REDD+ Framework Strategy. The DRC established Thematic Coordination Groups to ensure broader participation and multi-stakeholder committees. The strategies are still theoretical and to be tested through pilot projects. The National Committee for REDD still faces many changes to effective functioning, and according to the World Bank there are still many issues preventing effective coordination between relevant ministries.<sup>xxi</sup></p> <p>Finally, the ERPD presents a new arrangement that raises concerns. It states daily management of the program will be in charge of the Program Management Unit. This executive agency should be an independent firm or consortium, to be monitored by the Provincial REDD+ Steering Committee (ERPD, p. 80). As already stated in section 1b, the ERPD does not present any advance on the Provincial REDD+ Steering Committee for assuring its monitoring capabilities. Furthermore, as observed by EIA, the fact that these local executing agencies are independent of government, undermines the need of broader reforms in the public sector for proper ERP management<sup>xxii</sup>.</p>
	7b) The ER-PIN identifies opportunities for community-based interventions, including natural resource management, tenure recognition, and other dedicated REDD+ investments.	The ER-PIN says it will carry out participatory approaches to the ERP, such as community forest management and participatory mapping (ER-PIN, p. 23).It also states there will be consultations regarding community MRV processes, (ER-PIN, p. 80), but neither the ESMF nor the ERPD describe with detail the participation of IPs or local communities in these processes.

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	<p>7c) The ER-PIN discusses efforts to combat corruption and the measures that will be used in the ER Program</p>	<p>Corruption and non-enforcement of the law are mentioned as risks to the protected areas in the ER Program. The R-Package envisages a training plan to combat corruption. In spite of that, no further description was made of such plan. A recent analysis (2015) from CIFOR, states that although there have been efforts to combat corruption in REDD+ schemes, four types of corruption related to REDD implementation in DRC can currently be seen: payment of kickbacks, political cronyism in REDD+ positions, non-transparent use of REDD+ funds and inadequate reporting on REDD+ projects and non-transparent consultancy contracts.</p> <p>In spite of the aforementioned, the ERPD does not discuss or assess corruption as a real obstacle to the ERP. It mentions training of the judiciary to combat corruption as part of the legal framework and mentions a training plan is already prepared, but does not describe it (ERPD, p. 197). Anti-corruption measures were not listed among governance reforms, and there were irregularities with the program. EIA notes there were ineligible expenditures reports and ongoing investigation of corruption of on project staff member<sup>xxiii</sup>.</p>
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**8) Transparent monitoring and oversight of REDD+**

Grade	Indicator	ER-PIN Assessment
	8a) The ER-PIN shows evidence of an open-access information management systems for REDD+	<p>The self-assessment contained in the R-Package<sup>xxiv</sup> marks progress on the transparency and management of funds, but it is still unclear how the program development can be assessed by the public. For example, there are only few documents available on the website of the Ministry of the Environment, Conservation of Nature and Tourism and it is not yet clear how the funds would be channeled to local communities. Civil society has already asked for transparency regarding the use of Readiness preparatory funds, including that financial reports be published with details on the use of the initial \$3.6 million, and the additional preparatory funding of \$5.2.<sup>xxv</sup></p> <p>The ERPD says the ERP will have an integrated approach to monitor safeguard and program related benefits (ERPD, p. 185). As stated in section 6f, ERPD states there is an operational information system available, but it needs further capacity building to be implemented.</p>
	The ER-PIN proposes mechanisms to independently and transparently:	
	- 8b) Monitor the social and environmental impacts of REDD+ investments;	<p>Monitoring and oversight mechanisms are proposed in the ER-PIN and should include local stakeholders in network systems, but the platform was not operational by the time of the ER-PIN and lacked effective coordination and dissemination of data among the stakeholders.</p> <p>According to the ERPD, the ERP determines the 2004-2014 period for reference level (ERPD, p. 100) and describes with detail how sampling and collection of data on emission levels will take place (ERPD, p. 4; see also ERPD chapter 9). The ERPD states the ERP will head monitoring emissions caused by land use in the country (ERPD, p. 131), but does not describe how stakeholder involvement will take place. Monitoring of social aspects is unclear. The ERP mentions an Environmental and Social Management Plan (ESMP) (ERPD, p. 170) and that the national REDD+ registry will publish impact studies (ERPD, p. 171), but does not explain the mechanism itself.</p>

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-	- 8c) Monitor the application of safeguards via the Safeguard information system	As stated in section 6f, the ERPD states that a Safeguards Information System is operational and integrated into the registry (ERPD, p. 197), but will require further capacity building to work properly (ERPD, p. 171).
-	- 8d) Monitor the effectiveness of governance-related interventions;	The ER-PIN and the ERPD lack information on efforts to overcome political conflicts in the program target area, Mai Ndombe, which is not yet considered to be a politically operational regional entity. Description on forest governance monitoring is vague throughout the ERPD, and proposed mitigation measures (ERPD, p. 147-148), such as improvement of DRC jurisdictional system, are long-term objectives and depend on a broader governance reform. Monitoring governance seems even less feasible if, as stated in section 7a, the ERP management is delegated to a government independent arrangement (ERPD, p. 80).
-	- 8e) Track and coordinate international finance flows;	The ERPD says monitoring of funds will be in charge of the REDD+ Executive Secretariat, with help from Ministry of Environment and the Ministry of Finance (ERPD, pp. 79-80), and that payment will be made directly to the National REDD+ Fund (ERPD, p 85). Still, it does not explain how stakeholders can track these finance flows, and there were reports of misappropriation of funds <sup>xxvi</sup> .
-	- 8f) Monitor the distribution of carbon and non-carbon benefits	The ERPD indicates monitoring of carbon and non-carbon benefits will be integrated with the MRV system. It states it will track the allocation of credits through the emission reduction credits (ERC) together with generating activities and distribution of income among stakeholders (ERPD, pp. 175) and project holders (ERPD, p. 179). It also states monitoring of non-carbon benefits should be provided through proper application of safeguards (ERPD, p. 185).

**Section 3: OVERALL ASSESSMENT**

Grade	Indicators	ER-PIN Assessment
	9a) The proposed emission reduction program protects and advances the rights of indigenous peoples and local communities to land and forests within REDD+ systems and processes.	The ERP still lacks decisive steps on stakeholders' engagement and fully protecting their land and forest rights. The ER-PIN and following documents have not advanced on the identification of IPs and other vulnerable groups within the program, and has not yet presented a considerable tenure assessment at national and provincial level. Moreover, the platform for civil society participation - GTCR, is in need of continued strengthening, especially at the provincial level.

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9b) The proposed emission reduction program presents a credible plan for addressing governance issues at national and sub-national levels, and establishes clear processes for monitoring progress on critical risk factors.	Institutional arrangements for the ERP still seem incomplete. The ERPD states that daily management might be or not in charge of an independent executive agency, independent of government institutions. Beyond that, there are no advances on the Provincial REDD+ Steering Committee, ultimately responsible for monitoring processes.
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<sup>i</sup>FCPF DRC National Strategy Framework Appendices, available at: <https://www.forestcarbonpartnership.org/sites/fcp/files/2015/March/Strategie-cadre%20nationale%20REDD%20de%20la%20RDC%20Appendices.pdf>, accessed 05/13/15

<sup>ii</sup> UNDP, Accompanying DRC Civil Society through the REDD+ Process, December 2015.

<sup>iii</sup> Fern, FPP, 2014. Implement in haste, repent at leisure. April 2014, pp.11 available at: <http://www.forestpeoples.org/sites/fpp/files/publication/2014/04/fern-and-fpp-drc-5.pdf>, accessed 05/13/15

<sup>iv</sup> Environmental Investigation Agency, 2016. Preliminary comments by the Environmental Investigation Agency on the Democratic Republic of the Congo's Emission Reduction Program Document. Available at: <http://www.redd-monitor.org/wp-content/uploads/2016/03/EIA-Comments-DRC-ER-PD.pdf> p. 6

<sup>v</sup> FCPF, 2014. Participatory Self-Assessment of the REDD+ Readiness Package in the Democratic Republic of the Congo, Available at, <https://forestcarbonpartnership.org/sites/fcp/files/2015/April/DRC%20R-Package%20English.pdf>, pp 13

<sup>vi</sup> Fern, FPP, 2014. Implement in haste, repent at leisure. April 2014, pp.16 available at: <http://www.forestpeoples.org/sites/fpp/files/publication/2014/04/fern-and-fpp-drc-5.pdf>, accessed 05/13/15

<sup>vii</sup> Samuel Assembe-Mvondo, 2015. National-level corruption risks and mitigation strategies in the implementation of REDD+ in the Democratic Republic of the Congo: An overview of the current situation. U4 Issue April 2015 No 9. Pp 6. <http://www.redd-monitor.org/wp-content/uploads/2015/05/U4-Issue-2015-09-WEB.pdf>

<sup>viii</sup> Id. at pp 24

<sup>ix</sup> Environmental Investigation Agency, 2016. Preliminary comments by the Environmental Investigation Agency on the Democratic Republic of the Congo's Emission Reduction Program Document. Available at: <http://www.redd-monitor.org/wp-content/uploads/2016/03/EIA-Comments-DRC-ER-PD.pdf> p. 8

<sup>x</sup> Id. at pp 12

<sup>xi</sup> Id. at pp 8

<sup>xii</sup> FCPF, 2014. Participatory Self-Assessment of the REDD+ Readiness Package in the Democratic Republic of the Congo, Available at, <https://forestcarbonpartnership.org/sites/fcp/files/2015/April/DRC%20R-Package%20English.pdf> p.20

<sup>xiii</sup> Greenpeace, 2015. Trading in Chaos. Available at: [http://www.greenpeace.org/africa/Global/africa/publications/forests/2015/Trading\\_In\\_Chaos.pdf](http://www.greenpeace.org/africa/Global/africa/publications/forests/2015/Trading_In_Chaos.pdf) p. 12

<sup>xiv</sup> Id. at pp 12

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<sup>xv</sup> Fern, FPP, 2014. Implement in haste, repent at leisure. April 2014, pp.19 available at:

<http://www.forestpeoples.org/sites/fpp/files/publication/2014/04/fern-and-fpp-drc-5.pdf>, accessed 05/13/15

<sup>xvi</sup> FCPF. 2014. Emissions Reduction Program Idea Note, DRC Maï Ndombe REDD+ ER Program. Available at

<https://www.forestcarbonpartnership.org/sites/fcp/files/2014/April/DRC%20ER-PIN%20CF9.pdf>, pp 23

<sup>xvii</sup> Fern, FPP, 2014. Implement in haste, repent at leisure. April 2014, pp.21 available at:

<http://www.forestpeoples.org/sites/fpp/files/publication/2014/04/fern-and-fpp-drc-5.pdf>, accessed 05/13/15

<sup>xviii</sup> Environmental Investigation Agency, 2016. Preliminary comments by the Environmental Investigation Agency on the Democratic Republic of the Congo's Emission Reduction Program Document. Available at: <http://www.redd-monitor.org/wp-content/uploads/2016/03/EIA-Comments-DRC-ER-PD.pdf> p. 3

<sup>xix</sup> Id. at pp 10

<sup>xx</sup> Id. at pp 10

<sup>xxi</sup> WB, Forest and Environmental Conservation Project, Implementation Completion Report, p.23

<sup>xxii</sup> Id. at pp 2; 8

<sup>xxiii</sup> Id. at pp 13

<sup>xxiv</sup> FCPF, 2014. Participatory Self-Assessment of the REDD+ Readiness Package in the Democratic Republic of the Congo, Available at,

<https://forestcarbonpartnership.org/sites/fcp/files/2015/April/DRC%20R-Package%20English.pdf>, pp 33

<sup>xxv</sup> Rainforest Foundation Norway submission on the DRC R-Package to the 2015 FCPF Participants Assembly and Participants Committee.

<sup>xxvi</sup> Environmental Investigation Agency, 2016. Preliminary comments by the Environmental Investigation Agency on the Democratic Republic of the Congo's Emission Reduction Program Document. Available at: <http://www.redd-monitor.org/wp-content/uploads/2016/03/EIA-Comments-DRC-ER-PD.pdf> p. 13