

Assessing the FCPF Carbon Fund ER-PINs in the context of effective safeguards advancing protections for Indigenous Peoples and communities land and forest rights and tackling the broader governance challenges causing deforestation and forest degradation

COUNTRY: Madagascar

DATE OF PIN: Sept 21, 2015

Stakeholder participation in ER-PIN planning and ERP design	
	<i>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</i>
	<i>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</i>
<p>The ER-PIN does not show evidence of stakeholder engagement, especially at the local level. The only civil society organizations listed as proposed program partners are international conservation organizations (Wildlife Conservation Society and Conservation International), and WCS actually submitted comments to the FCPF noting that they had not been sufficiently consulted by the government.¹ In fact, the ER-PIN describes a period of “consultations” over eleven days in August 2015 when the ER-PIN was designed.² These appear to have been targeting mostly governmental actors, although the local COBA community associations are mentioned. Neither the number of meetings, nor the number of people who participated are cited, and there is no additional evidence of any consultations in the annexes.</p> <p>There is no description of a specific stakeholder engagement plan for the ER program design process, only generalities. The requested timeline for development of the ER program (section 7.4) is left blank; the accompanying table only identifies implementation activities, not ER program design.³ The ER-PIN appears to propose a series of meetings focusing on the proposed ER program area, and aligned with the implementation of readiness activities such as the communication plan and the strategic environmental and social assessment (SESA), a sensible approach, but it is not entirely clear from the description.⁴ There is a mention of including vulnerable groups and women, but not enough specific information to assess an actual plan.</p> <p>The ER-PIN proposes to involve local stakeholders in the implementation of many activities, but both coordination and control and program steering are to take place at higher levels, where only representatives of local stakeholders might participate. For example, a new entity, called an Inter-Communal Public Entity (<i>Organe Public à Caractère Intercommunal</i>, OPCI) is to be organized to represent 171 municipalities across 14 watersheds in 3 regions. CSO or local government representatives on national steering bodies are not mentioned.⁵</p>	

¹ 9 October 2015 WCS Comments on the Madagascar ER-PIN, p.2

² ER-PIN, p. 23

³ Ibid, p. 29

⁴ Ibid, pp.24-5

⁵ Ibid, p.26 and Annex 7

Land and forest tenure	
	<i>2a) Robust tenure assessments in the geographical area of the proposed ER Program were conducted as part of the SESA</i>
	<i>2b) Land and resource tenure assessments were publically vetted and endorsed by all concerned stakeholders;</i>
	<i>2c) The land use / land tenure context of the proposed ER Program, including implementation risks (conflicting claims) and available arbitration processes is well defined.</i>
	<i>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</i>
<p>No land or forest tenure assessments have yet been carried out as part of REDD+ readiness. As of ER-PIN drafting, the SESA was still being prepared and had not yet been launched. A “land tenure diagnostic for REDD+ implementation” is mentioned as part of the legal framework analysis to be carried out as part of REDD+ readiness activities.⁶</p> <p>The ER-PIN provides a very high level overview of the land tenure situation in Madagascar, with no specific or spatially explicit discussion of the situation in the proposed ER program area. In terms of forest tenure, communities have the right to manage forests under law 96-025, approved in 1996 and known as GELOSE, which created the possibility of establishing community forests. The ER-PIN describes the legal framework that emerged with the 2005 Law 2005-109, which recognized that occupied lands were not property of the state, but private property, and transferred responsibility for managing non-public lands from the central to local government.⁷ From 2005 on communal land offices were established with the authority to issue not land titles, but land certificates, which are neither permanent (they can be revoked) and are not actually demarcated on the ground or spatially explicit as to their boundaries. The ER-PIN states that of the 171 municipalities in the ER program area, “125 municipalities have an active communal land titling windows” although it is not clear what this means as no figures are provided on the hectares of land that have been titled to individuals, the areas managed by communities under the GELOSE and GCF laws.⁸ The ER-PIN acknowledges that “effective solutions for collective recognition of land rights, which often encompass forest land, are still lacking” as the land law only applies to individuals.⁹</p> <p>A study of the community forests in Madagascar some ten years (USAID 2007) after the GELOSE devolutions began identified a series of gaps in both the legal framework (lack of implementing regulations) and the support offered to communities (local associations were essentially left to fend for themselves, including self-financing) such that the balance between costs (communities were expected to carry out new conservation activities) and benefits was very uneven and many community members lost interest. A World Bank study of community forestry and its impact on deforestation and livelihoods, published January 2016, found that it was not possible to demonstrate an impact on either deforestation rates or income levels in the communities.</p> <p>It is repeatedly recognized in the ER-PIN that current legal framework for land tenure encourages deforestation, as access to land under customary law and national law is often on the basis of having cleared forest to show ownership and use, and that the lack of tenure security contributes to a lack of investment in agro-forestry or agricultural intensification.</p>	

⁶ Ibid, p.10

⁷ Ibid, p.48

⁸ Ibid, p. 12

⁹ Ibid, p. 49

The ER-PIN goes on to say that the “future of the National Land Tenure Program and the Land Observatory remains volatile as these institutions are entirely supported by donors.” who pulled out in 2009 and are just starting to return. It further states: “In May 2015, ten years after the 2005 land tenure reform, the Government approved a new letter of land tenure policy to take into account the lessons learned during the application of the new reform. However, following a two-month strike by the cadaster officers’ trade union and tense relations with Parliament, the Government has recently had to revise the letter of land tenure policy, taking a step back from the decentralized system envisaged in the original land tenure reform.”¹⁰

Assignment of rights to forest carbon

- 3a) *The legal framework for carbon rights is defined in the ER-PIN*
- 3b) *The process for dealing with contested and/or overlapping land, forest and carbon claims is defined.*
- 3c) *The process for legal transfer of emission reduction titles is defined taking into account the customary and statutory IP/LC rights holders in designated accounting area.*

The ER-PIN is silent on issues of rights to carbon and has no explanation of how rights to emission reduction titles would be determined under law, nor what processes have been followed in the existing REDD+ pilot projects, which have, for example, allowed WCS to sell credits on the voluntary market. It is worth noting as well that the analytical work planned under the readiness grant, for component 2.4 (implementation framework) includes work to define the property rights for carbon.¹¹

The World Bank (2013) Country Environmental Analysis notes: “there is a need to define the legal status of carbon credits and to integrate the question of carbon rights into existing natural resource management legislation (i.e. GELOSE and GCF legislation) to provide surety for communities, avoid inconsistencies in the treatment of different types of natural resources and avoid complex and potentially redundant legislative frameworks.”¹²

Aquino (2014) builds on this notion, explaining that with the presence of nested projects in an ER Program area there is even greater need to develop a clear legal framework for carbon transactions: “In the case of a nested REDD+ framework where projects have to fit into a national accounting framework, such the approach taken in Madagascar, the State needs to adopt policies and legislation on the granting of permits to third parties (i.e. private sector, NGOs or sub-national government bodies) to develop REDD+ projects and sell credits in the markets. Such a system should be based on a transparent and competitive process for awarding these permits, and clearly specifying the rights and obligations of the project developer, including in terms of consultations with landholders, respect of safeguards, and reporting requirements. Madagascar has not yet adopted such rules, which creates uncertainties for project developers and potential credit buyers.”¹³

There is no discussion of the issue of contested and overlapping lands and how these would be dealt with in terms of the assignment of carbon rights. The ER-PIN suggests alternatively that grievance mechanisms for forest areas already exist, that a mechanism used for the large mining projects can be

¹⁰ Ibid, p.49

¹¹ WB R-PP Assessment Note, p. 52

¹² WB CEA 2013,p.43

¹³ Aquino 2014, p.6

replicated, and that a grievance mechanism will be created through the establishment of Regional Committees for Management of Environmental Complaints.¹⁴ Other authors (Neimark 2013) describe situations of overlap and conflict: “customary claims to land, which are generally interpreted by investors as vacant or “unused,” conflict with official state titles and increasingly with land allotted for foreign agribusiness investment...”¹⁵ The WB CEA cites recent case studies that conclude: “corruption of high level officials and magistrates and lobbying of judges in the courts continuously undermines the effectiveness of the justice system.”¹⁶

The ER-PIN does not discuss the role of perceived land grabbing (the granting of 1.3 m ha of land to Daewoo) as one of the events which set off the 2009 coup d’etat,¹⁷ but refers only to “tensions in the land sector”. There is no discussion of ER title transfer, nor customary or statutory rights to carbon revenues by communities.

Equitable benefit sharing and non-carbon benefits

- 4a) *The ER-PIN presents a transparent and verifiable process to equitably share carbon-related benefits (e.g., REDD+ revenue streams).*
- 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).*
- 4c) *The benefit sharing mechanisms outlined in the ER-PIN are broadly supported by indigenous and forest dependent communities, including women.*

The ER-PIN describes the benefit sharing arrangements for the proposed ER programs as being at an “embryonic stage” (p.50) despite the fact that Madagascar has several REDD+ projects which have been ongoing for several years and which have developed functioning benefit sharing mechanisms and that the GELOSE law was also established to permit community forestry, with the intention of fostering community capture of benefits from forest exploitation. In addition, a benefit sharing study for the CAZ project, sponsored by the World Bank Bio-Carbon Fund, was published in April of 2014, well before the ER-PIN was prepared and submitted.

The ER-PIN does describe a general approach to benefit sharing, which appears to be very similar to that being used in the CAZ and Makira REDD+ projects, in which about 50% of the benefits are earmarked for local communities. The benefit sharing study for the CAZ reports that the CIRAD team organized “several stakeholders’ consultations with multiple visits in the CAZ (particularly in the rural communes of Maroseranana and Didy, in addition to discussions with VOI Federations in Moramanga).” but does not provide any documentation.¹⁸ They further report that the 50% allocation to communities has broad support, again without providing any documentation to support that conclusion. One key difference in the overall approach the government appears to be taking in the proposed ER program is allowing the 50% allocation for communities to be used without restrictions to specific conservation activities, which is different from what is currently being done in Makira REDD+ Carbon Project, for instance. The ER-PIN comments from WCS (the Makira manager) note they are concerned that changes to the benefit sharing regime will undermine trust and make it more difficult for communities to access

¹⁴ ER-PIN, p.46

¹⁵ Neimark 2013, p. 8

¹⁶ WB CEA 2013, p.38

¹⁷ Neimark 2013, p.8

¹⁸ BioCF 2014, p.12

benefits.¹⁹ In general, there is no evidence in the ER-PIN that the proposed benefit sharing mechanisms have been widely discussed or negotiated with local stakeholders yet.

The ER-PIN does not describe a process for prioritization of non-carbon benefits, and most benefits are posited to flow from agricultural intensification and diversification aimed at reducing traditional shifting cultivation, so are unlikely to be highly popular. Development of “new forms of energy” and “better yields on wood energy” are also proposed, which appear to be based on plantation forestry for wood fuel and sustainable charcoal type initiatives.

Land tenure security is also identified as a non-carbon benefit, but the way it is described is potentially problematic—awarding land tenure to communities not in recognition of their customary rights, but in a “new way” as a reward for giving up shifting cultivation/*tavy* practices.²⁰

Alignment of ERP strategies with main drivers of deforestation

	<i>5a) The drivers of deforestation and forest degradation identified in the ER-PIN are consistent with expert analyses and local stakeholder input.</i>
	<i>5b) Challenges to overcoming identified drivers (i.e., technical, institutional, political or economic) are clearly defined.</i>
	<i>5c) Proposed ER Program interventions specifically target the main drivers and their related challenges.</i>

The ER-PIN puts the blame for most deforestation squarely on communities- targeting traditional shifting cultivation as the primary driver. Additional drivers identified include fuel wood collection, commercial and artisanal logging, commercial and artisanal mining and cattle ranching. The indirect causes of deforestation in Madagascar are listed as low agricultural productivity, population growth, poverty, poor access to education, and political instability and governance failures.²¹

A long series of barriers to REDD+ are described, these include: widespread poverty which inhibits agricultural investment and makes farmers risk adverse, insecure land tenure, population growth (which drives land shortages and the need for greater food production through agriculture and cattle ranching), lack of alternatives to fuel wood energy, weak law enforcement, poor legal compliance in the forest sector, poor inter-sectoral coordination, the high opportunity cost of forgoing mineral exploitation in forest areas, and weak law enforcement with respect to cattle ranching.²²

If one accepts that shifting cultivation/*tavy* is the main driver of deforestation, then the proposed program is reasonably well aligned to the main drivers, although the proposed interventions rely on restricting and dissuading communities from continuing their traditional agricultural practices in return for benefits in the future from agricultural intensification and the creation of “non-land” jobs through enhanced value chains in commercial agriculture and timber. This risks creating disproportionate burdens on communities, negative impacts on livelihoods and food security and being ineffective because both the economic and cultural rationales for continued *tavy* cultivation are strong.²³

¹⁹ WCS Comments, p.1

²⁰ ER-PIN, p.19

²¹ Ibid, p.17

²² Ibid, p.18

²³ For a fuller discussion of this issue see Urech, Zora Lea, et. al., 2015

The proposed interventions to address land tenure, enhanced law enforcement and governance generally are not well described. The scientific literature on deforestation in Madagascar is characterized by a long standing assumption that community shifting cultivation is the main driver which has more recently been brought into question.²⁴

Safeguards framework	
	<i>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)</i>
	<i>6b) The assessment of social and environmental considerations was conducted in a transparent and participatory manner.</i>
	<i>6c) The ESMF integrates WB OPs and FPIC considerations.</i>
	<i>6d) The EMSF identifies key steps, including budget and timeline, to strengthen forest governance issues within the national legal framework</i>
	<i>6e) The independent grievance/dispute resolution mechanism, derived from the FGRM assessment, is described.</i>
	<i>6f) The ER-PIN describes the design of the Safeguard Information System and its application in the context of the ER-Program</i>
	<i>6g) Proposed safeguards adequately address the land and resource rights of indigenous peoples, forest communities and women</i>
<p>The R-PP implementation grant was approved only in mid-2015, and is reportedly dispersing, and the ER-PIN (September 2015) reports that a tender has been initiated to hire consultants for the SESA process, which is expected to get underway in the second quarter of 2016. It is therefore not possible to evaluate the proposed safeguard measures for the ER program, and very little indication is given in the ER-PIN of the proposed content of these measures. There is no discussion of FPIC in Madagascar's ER-PIN.</p> <p>The ER-PIN does says that Madagascar has significant experience with SESA's, with fifteen having passed through environmental review. The National Environment Office (ONE) will reportedly lead the SESA process. ESMF's for the WB supported CAZ (2012) and Makira (2013) projects are publically available and provide some relevant information, given their partial or total inclusion in the proposed ER program area. Both safeguard plans were developed over the course of a few months and involved interviews, community meetings, and household surveys, theoretically with all potentially project affected peoples (PAPs). Both projects, like the proposed ER program, attempt to restrict community access to forests and reduce swidden cultivation, entailing significant economic losses by very poor households generally dependent on natural resources for their livelihoods.</p> <p>The ESMF for the CAZ estimates losses for 2,500 households in the order of US\$250,000/yr, while the ESMF for Makira estimates closer to US\$750,000/yr in losses for 4,376 households, meaning close to \$1 million year in lost income for only a small portion of the families in the proposed ER program area, as the CAZ is just part of ER program area. The implementation of the compensation measures identified in the safeguards plans was through resources from Conservation International as well as Madagascar's World Bank supported Environmental Program, the latter of which did not all materialize.</p>	

²⁴ See Gorenflo, et.al. 2011, Allnut et.al 2013

The latest implementation reports for the Environment Program (which closed at the end of 2015) note that compensation was distributed to about a third of the intended households.²⁵

The description of grievance mechanisms in the ER-PIN is somewhat ambiguous, as it says that the basis for a ER program grievance mechanism already exists for forest and mining resources/projects, but also that it will be established in the future, specifically that with capacity building and strengthening it will be operational by mid-2016. It goes on to say that regional committees are already established in most regions, including the ERP area, under the Service Grievance Management and Environmental Control, which includes a complaint register in each municipality. It then says that special committees will be set up in each eco-region, which will have varying composition, based on stakeholder consultation. The ER-PIN does not describe a design process for the SIS, nor any progress therein. The ER-PIN does mention that a SIS will be developed, referring back to the R-PP.²⁶

Government capacity and coordination in ERP planning and implementation

7a) *The ER-PIN shows evidence of coordination across sectors, line ministries, and levels of government (local, sub-national, national).*

7b) *The ER-PIN identifies opportunities for community-based interventions, including natural resource management, tenure recognition, and other dedicated REDD+ investments.*

7c) *The ER-PIN discusses efforts to combat corruption and the measures that will be used in the ER Program*

The Ministry of Environment, Ecology, Sea and Forests is responsible for the development and implementation of the ER program. The ER-PIN lists as partner agencies a series of government ministries, including Agriculture, Interior and Decentralization, Energy and Hydrocarbons, Livestock as well as the State Ministry in charge of the Presidential Projects, Country Planning and Facilities. Letters of endorsement were received from the Ministry of Agriculture and Ministry of Energy and Hydrocarbons. No sub-national governmental entities are listed as program partners. The ER-PIN describes ongoing coordination between the Environment and Agriculture Ministries in particular as part of the development of the program and the driving force behind the watershed approach.²⁷

Two inter-ministerial structures are proposed for coordination: a steering committee at the national level and a planning and monitoring committee at the regional level. Coordination and control will be the responsibility of the National REDD office and the decentralized units of the various ministries. In terms of local participation, as mentioned, the Inter-Communal Public Entity will represent the 171 municipalities across three regions that are proposed to be involved in the ER program. Communities, organized in *Fokontany* or *Fokonalona* are included at the execution level of the program. While not entirely clear from the ER-PIN, it appears that the OPCI does not yet exist in practice, and the ER-PIN describes the technical capacity of municipalities as mixed, and financial capacity as poor, due to the political crisis.²⁸

The ER-PIN acknowledges that “Inter-sectoral collaboration has always been a challenge in Madagascar in the past”²⁹, and lists poor inter-sectoral coordination in the mining sector as one of the barriers to

²⁵ World Bank Madagascar Environment Program III, Implementation Supervision Report #23. P.21 December 2015

²⁶ ER-PIN, p.46

²⁷ Ibid, p.8

²⁸ Ibid, p.27

²⁹ Ibid, p.56

REDD, noting that “Mining permits are provided without regard to forestry or conservation zoning”³⁰

External sources note “The CT-REDD, while large and active for years now, has no formal status, and lacks high-level political support and strong internal leadership. There is no single agency within Government responsible for coordination of activities and liaison with external and stakeholders. There is little inter-sectoral coordination or involvement of agencies responsible for related land-use or resource management decisions in the current institutional setting, despite the historic and repeatedly demonstrated links between deforestation and forest degradation and other activities such as agriculture or mining”.³¹

The WB Assessment Note for the R-PP grant notes “There is a risk of insufficient inter-ministerial coordination for REDD+ activities or ambiguity about the role of different sectors. Coordination by the Ministry in charge of Forests may be insufficient to secure the participation of other sectors.”³² Aquino states, “The experience of the Inter-Ministerial Committee for the Environment (CIME) in ensuring cross-sectoral coordination has not been positive and highlights the challenges that remain to be faced in this regard”.³³

Madagascar has a framework for community-based management of natural resources and two decades of experience with community forestry through the GELOSE and GCF laws. The ER-PIN is largely predicated on community-based interventions around forestry, agriculture and energy, with local governments (*Fokontany*) and traditional governance institutions (*Fokonolona*) proposed as the major implementers of activities. Strengthening of community land tenure security is mentioned as an element of these proposed interventions, although it is not clear exactly how and in what form tenure would be secured.

Corruption, especially in the forestry sector regarding the illegal logging of precious hardwoods is noted as a barrier to REDD³⁴ and a driver of deforestation³⁵, but the strategies to deal with corruption are only referred to at a vague and general level: denunciation, law enforcement, policy reform. There is no discussion of proposed anti-corruption measures for the ER Program itself. Allegations from international NGO’s of high and low level governmental complicity in illegal logging in Madagascar point to a deeper problem with regard to corruption in the timber sector.³⁶ The proposed ER Program area covers much of the epicenter of illegal rosewood and ebony harvesting. The WB CEA notes that “Weak institutions and corruption plague the implementation and enforcement of environmental law in Madagascar” and that this is particularly a problem in the forestry and mining sectors, but also includes the judiciary.³⁷

³⁰ Ibid, p.18

³¹ Aquino 2014, p.6

³² WB R-PP Assessment Note, p.44

³³ Aquino 2014, p.6

³⁴ ER-PIN, p.18

³⁵ ER-PIN, Table, pp. 74-6

³⁶ EIA 2014, pp.2-3

³⁷ WB CEA 2013, p.xv

Transparent monitoring and oversight of REDD+	
	<i>8a) The ER-PIN shows evidence of an open-access information management systems for REDD+</i>
	<i>The ER-PIN proposes mechanisms to independently and transparently:</i>
	- <i>8b) Monitor the social and environmental impacts of REDD+ investments;</i>
	- <i>8c) Monitor the application of safeguards via the Safeguard information system</i>
	- <i>8d) Monitor the effectiveness of governance-related interventions;</i>
	- <i>8e) Track and coordinate international finance flows;</i>
	- <i>8f) Monitor the distribution of carbon and non-carbon benefits</i>
<p>The design of the national MRV and SIS platforms appear to be at an early stage in Madagascar, but the ER-PIN describes governance and non-carbon benefits as one of three main pillars of the system, along with monitoring of carbon emissions and removals and deforestation drivers.³⁸ The ER-PIN states that the REDD+ Coordination Office will establish a public Geo-Portal.³⁹ It is proposed that ONE be an independent verification body.</p> <p>There is a very short reference to the development of an ER program monitoring plan for safeguards that will be informed by the SESA and develop social indicators for land tenure, gender inclusion, community participation and co-benefits such as poverty reduction, biodiversity conservation and ecosystem services.⁴⁰ There is little to no information about progress or plans on SIS establishment in the ER-PIN. The regional safeguards monitoring units of the national REDD+ Coordination have yet to be established.</p> <p>There is little to no specific or detailed information about progress or plans to monitor governance related interventions, to track and coordinate international finance flows or to monitor non-carbon benefits.</p>	

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.	Madagascar has in place a system to permit community based management of natural resources, which however has by and large failed to reduce deforestation or improve livelihoods. It is unclear whether the proposed ER program would significantly advance community rights to land and forests. Equally, Madagascar has relevant safeguards experience in the proposed ER program area, but with very mixed results.
	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.	There is little or no information on how the proposed program will address the main governance issues around illegal logging, land rights, mining and monitoring systems are at a very early stage of development.

³⁸ ER-PIN, p.35

³⁹ Ibid, p.86

⁴⁰ Ibid, p.41

Concluding Remarks

The Government of Madagascar was only just beginning to implement their REDD+ readiness activities under the R-PP implementation grant at the time of ER-PIN submission, meaning that most activities were not yet underway. Further, the REDD+ process suffered a considerable set back due to the 2009-2014 coup d'état and subsequent transition back to elected government, so the country was not well positioned to prepare an emission reduction program in the absence of a national REDD+ strategy and significant readiness work. Unfortunately, the ER-PIN does not build well on the comparative advantages that Madagascar does have for REDD+ - the twenty year history with community forestry and community based management of natural resources through the GELOSE and GCF laws, and the extensive REDD+ experiences through multiple pilot projects, neither of which are well described nor leveraged for the ER-PIN.

It is therefore not possible to judge the proposed REDD+ safeguard systems for local people, as they are not yet articulated. There is however a fairly extensive literature on the safeguard experiences in the CAZ and Makira REDD+ projects, which makes clear that further efforts are needed to reach all populations affected by restrictions on access to natural resources, and at a deeper level, calls into question whether premising a REDD+ strategy on the reduction of shifting cultivation is a viable way forward in the absence of clear and permanent recognition of community land and forest rights. What is also clear is that the dual land tenure system of overlapping customary and state ownership, and the lack of a legal framework for carbon transactions, among other issues, creates significant challenges for REDD+. Studies on the community forestry experience in Madagascar have failed to demonstrate any impact on either community livelihoods or deforestation, suggesting that the reforms which created the GELOSE and GCF laws did not go far enough to create a sustainable framework for community forest management, and that further support is needed for communities to benefit from keeping their forests standing.

Annex 1: Glossary and Sources

I. Acronyms used in this assessment:

Bio-CF	World Bank Bio-Carbon Fund
CAZ	Corridor Ankeniheny-Zahamena
CEA	World Bank Country Environmental Analysis
CIRAD	French Agricultural Research Centre for International Development
COBA	Local community association
CRGPE	Regional Committee for Management of Environmental Complaints
CT-REDD	National REDD Steering Committee
ER	Emission Reduction
ER-PIN	Emission Reduction Project Idea Note
ERPD	Emission Reduction Program Document
ESMF	Environmental and Social Management Framework
FCPF	World Bank Forest Carbon Partnership Facility
FPIC	Free, Prior, Informed Consent
FRGM	Feedback and Grievance Redress Mechanism
GELOSE	Local Management of Renewable Natural Resources
GCF	Contractualized Forest Management
IP/LC	Indigenous Peoples & Local Communities
MRV	Monitoring Reporting Verification
ONE	National Environment Office
OPs	World Bank Operational Policies
OPCI	Inter-Communal Public Entity (<i>Organe Public à Caractère Intercommunal</i>)
REDD+	Reduced Emissions from Deforestation and forest Degradation
R-PP	REDD+ Readiness Preparation Proposal
SESA	Strategic Environmental and Social Assessment
SIS	Safeguard Information System

VOI	Vondron'Olona Ifotony (local village-level associations)
WCS	Wildlife Conservation Society

II. Documents reviewed to produce this assessment:

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