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**WWF comments on
UN-REDD Programme, Social and Environmental Principles and Criteria
Draft for consultation – 30 June 2011
Vienna, 28 July 2011**

Dear members of the UN-REDD Programme policy board,

Although WWF is not a member or official observer of the UN-REDD programme, WWF is observing the process intensively and is willing to share lessons from our many decades of forestry, conservation and community development experience to provide input and support to UN-REDD. We would have welcomed formal notification and invitation to provide feedback on the Draft UN-REDD Programme, Social and Environmental Principles and Criteria. Nevertheless, please find below WWF's comments and recommendations on the Principles and Criteria (P&C).

Process

WWF is concerned that the process of developing the document is lacking transparency and appropriate procedures for stakeholder consultation.

Recommendations:

- Increase transparency and participation of relevant stakeholder. This could be done through direct timely notification and invitations for comments, through public comment periods via the UN-REDD webpage or through notification via the UN-REDD newsletter.

Purpose

WWF welcomes the intention of the UN-REDD programme to develop tools and guidance to enhance the multiple benefits of, and reduce risks from REDD+.

However, WWF raises concerns that the two purposes of the P&C as outlined in the document may not be achieved. While we do appreciate the more detailed interpretation of the safeguards as outlined in the Cancun agreement, we don't see appropriate guidance on how these P&C should be applied by countries who are already receiving or are seeking for UN-REDD funding.

It remains unclear how the P&C are harmonised with the ongoing process of providing guidance on information systems under the UNFCCC.

Finally, it seems that the overall purpose of the P&C is reactive rather than proactive, focusing on minimising harm rather than promoting positive change. More ambitious objectives would be welcome, similar to those included in the Forest Investment Program's (FIP) Results Framework relating to reducing GHG emissions,

reducing biodiversity loss and increasing resilience, increasing direct management of forests by forest dependent communities, addressing key pressures/drivers and ensuring predictable future funding. While we recognise that the two documents have different roles, it would be valuable to align the goals of these P&C with the high level objectives of other REDD institutions such as the FIP and FCPF.

Recommendations:

- Provide more detailed guidance on policies and processes how the P&C should be applied in order to achieve the desired objectives to enhance multiple benefits and reduce risks of UN-REDD programme activities and to support countries in operationalising UNFCCC agreements on safeguards.
- Provide clarity on how monitoring and providing information on the P&C interlink with the guidance on information systems as to be defined by the UNFCCC.
- Consider setting out a higher level of ambition in the Purpose section, including a statement to support the ambitions of the Cancun text and promote the values ascribed to by the FIP.

Principles and Criteria

WWF believes that the P&C, version 2 are generally well-formulated and are a significant improvement compared to version 1. We strongly support the inclusion of the concept of free, prior and informed consent in Criterion 5. WWF is also pleased that a number of our comments and recommendations (as provided to the UN-REDD secretariat on 15th April 2011) on version 1 have been incorporated. We welcome the formulation of Principle 2 on *rights* as well as an improved and more ambitious Principle 3 on *livelihoods*. WWF still sees some area of improvement in particular on Criteria 7, 8, 9, 10, 12, 13, 20 as well as Principle 5 and associated criteria 14 and 15. We propose an additional Criterion under Principle 6, to address the risks and potential benefits associated with forest restoration as per the Nagoya objective to restore 15% of degraded ecosystems by 2020.

Recommendations:

- Criterion 7: Respect and protect cultural heritage, traditional knowledge (add) *and way of life* (eg nomadic groups)
- Criterion 8: Ensure equitable and transparent benefit distribution among relevant stakeholders (add) *with special attention to the most vulnerable and marginalized groups.*
- Criteria 9 and 10: These criteria could be re-worked to be more precise and measurable.
- Criterion 12: Ensure consistency with and contribution to national poverty reduction strategies and other sustainable development goals, (add) *including alignment with the development and other strategies of ministries, regional governments and other government bodies that may have an impact on the forest sector, direct and indirect land use change.*
- Criterion 13: Ensure consistency with and contribution to national biodiversity conservation, other environmental and natural resource management policy objectives (add) *and associated land-use planning*, national forest programmes and international commitments.



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- Principle 5, Criteria 14 and 15: This principle and the associated criteria should also aim to protect other natural (non forest) habitats such as natural peat, grassland and freshwater habitats from conversion and degradation. WWF is aware that only natural forests are mentioned in the Cancun agreement, however, this would be a significant improvement of the biodiversity safeguard and would also provide consistency with the UN CBD.
- Principle 6: We suggest an additional criterion to address the risks and potential benefits associated with forest restoration: “The enhancement of forest carbon stocks, afforestation and reforestation should seek to match the original biodiversity of the area, prioritizing the use of a mix of locally native tree species and should be conducted only on ecologically appropriate lands in order to ensure, or restore when degraded, ecosystem integrity and function.”
- Criterion 20: Minimise other indirect impacts on biodiversity (add) *and ecosystems services, such as soil or water pollution*, resulting from intensification of land use.

WWF hopes that you will consider our comments and recommendations. We will further stand by to provide contribution and support to the UN-REDD programme,

Sincerely,

Gerald Steindlegger
Policy Director, WWF Forest & Climate Initiative