

Response to comments on the Draft REDD+ Social & Environmental Standards Version 2 Oct 2009 received during the first 60-day public comment period 2 Oct to 30 Nov 2009

All comments on the Draft REDD+ Social & Environmental Standards Version 2 Oct 2009 received during the first 60-day public comment period 2 Oct to 30 Nov 2009 have been compiled by principle in the following tables. These comments were discussed by the Standards Committee during a meeting in Copenhagen 4-5 December 2009 at which the main changes to the standards reflected in the version of standards of 9 December 2009 were agreed. This response to comments has been prepared by Joanna Durbin jdurbin@climate-standards.org and Phil Franks phil@ci.or.ke in their capacity as the secretariat to the REDD+ Social & Environmental Standards initiative.

15 Jan 2010

General

No	Comment	Proposed changes	By	Response
1	we would like to ask some inquiries, 1)does this included the right holder's who are excluded from many natural resources many years such as Dalits, 2) What and how much revenues can the Dalit communities can get benefit from Carbon 3)There are so many highlighted about REDD, Climate but what point have been thought for adaptation for Dalits and Dalit women. We would be very grateful if the reports are included such matters.	The standards should encourage actions that assist with adaptation to climate change.	1	The requirement in principle 3 for the REDD+ program to improve the long-term livelihood security and well-being of Indigenous Peoples and local communities will provide an important contribution to assist them to adapt to climate change. The standards require REDD+ programs to identify, map, maintain and enhance biodiversity and ecosystem service values for climate change adaptation – see 5.1.
2	Firstly I would like to commend all those concerned with the design and potential implementation of REDD+. This will not only assist human beings and indeed all examples of life directly affected by deforestation and degradation of important and relevant biomes and habitats but it will also provide well defined direction for all entities looking to develop projects of this type. This is greatly needed. Although the adoption of such a standard will provide many benefits for those it directly affects, I believe there are grounds for additional benefits that are associated with the global demand for natural resources derived from these areas. For example, if the demand for exotic wood materials		4	No specific response.

	<p>and animal species was more accurately monitored and then managed it would have a likely flow on benefit for these projects and their biodiversity value as well. Leakage then could also be addressed as practical solutions rather than simply problems arising from shifting the burden of these actions to other areas. Eventually I believe there will be greater awareness of the overall effects of growing human population and that of other species of flora and fauna, these issues clearly exacerbate existing issues and if a standard like REDD+ is able to contribute to understanding this further then we are all more likely to successfully manage it too... Possibly our greatest challenge yet to come. I am merely offering you my thoughts after reading 'REDD+SE_draft_10_02_09' and I hope room for similar consideration can eventually be found.</p>			
3	<p>What is written in the Draft REDD+ Social & Environmental Standards, Version 2, October 2009 is mostly well designed. However, I feel that the CCBA should not release a standard that only reflects on the CB aspects, i.e. where the first C "Climate" is omitted.</p>	<p>So, my first suggestion is to include the important climate aspect (the reason for REDD+!) and restructure the draft standards using the classical 4 chapters of the CCB Standards:</p> <p>General Section (Principle 1, 4 and 8)</p> <p>Climate Section (add one or two principles here)</p> <p>Community Section (Principle 2, 3, 6 and 7)</p> <p>Biodiversity Section (Principle 5)</p>	5	<p>These standards address the social and non-carbon environmental issues related to REDD anticipating that UNFCCC and other regulatory bodies will set clear rules and requirements for the carbon accounting.</p>
4		<p>Principle 7 is a subpart of Principle 6, where it should be integrated.</p>	5	<p>While full and effective participation (principle 6) and access to information (principle 7) are very linked, it seems appropriate to treat them separately given the significant number of requirements and details related to each topic.</p>
5	<p>Consider requiring program proponents to describe the REDD+ program, including a statement of objectives, identification of the drivers of deforestation, development of the key activities and plans for their implementation etc.</p>		7	<p>A section has been included in the introduction to the standards explaining that in order to apply the standards, a REDD+ program must be defined by:</p> <ol style="list-style-type: none"> i. A statement of objectives ii. Identification of the drivers of

				<p>deforestation and forest degradation</p> <p>iii. Description of the policies, measures and activities and plans for their design and implementation</p> <p>iv. Definition of the geographical areas in which activities will be implemented, where relevant</p> <p>v. Definition of the institutional arrangements for program design, implementation and evaluation.</p>
6	<p>QUESTION 1: do we see indigenous peoples, local communities and other stakeholders as implementers or final beneficiaries?</p> <p>QUESTION 2: Do we assume that capacities of stakeholders and rights holders are inherent strategies in the indicators identified?</p>		10	<p>The standards require full and effective participation of rights holders and stakeholders including Indigenous Peoples and local communities in design, implementation and evaluation of the REDD+ program under principle 6.</p> <p>6.5 requires the REDD+ program to build capacity of rights holders and stakeholders to participate fully and effectively.</p>
7	Add another principle:	<p>9.1. consistent with sustainable development goals</p> <p>9.2 land use allocation should ensure that the production area does not encroach on the living area to maintain ecological services</p> <p>9.2.1 land and water management plans are available</p> <p>9.3. citizen participation in the design and implementation and monitoring and evaluation of land and water mgt plan</p>	10	<p>Consistency with sustainable development goals is required under principle 4. Maintaining ecological services is required under principle 5. Availability of relevant information is required under principle 7. Full and effective participation including in the design, implementation and evaluation of land use plans related to the REDD+ program is required under principle 6. So it does not seem justified to add another principle.</p>
8	Consider adding titles for each principle	<p>P1 [REDD and sovereignty]</p> <p>P2: [REDD and Equity]</p> <p>P3:[REDD and sustainable livelihoods and poverty alleviation]</p> <p>P4:[REDD and Sustainable development and good governance]</p> <p>P5: [REDD and Biodiversity]</p>	10	<p>While headings could be useful they could also be misunderstood. This suggestion can be reconsidered prior to the production of the final version of the standards.</p>

		P6: [REDD and stakeholders and rights holders] P7: [REDD+ and access to information] P8: [REDD+ and policies]		
9	I noted that at the beginning of the standards the terminology of “forest dependent peoples” (footnote 14) is used but toward the later principles there is a mix of terms used straying from the standards original defined term so it would be good to make sure that those types of terms are tightened up as can get confusing.		11	The term ‘forest-dependent peoples’ is no longer used and the term ‘Indigenous Peoples and local communities is used throughout the standards.
10	The mechanism is attempted to be as comprehensive as possible. In this process, it favours co-ordination between various local stakeholders groups, government agencies and departments. But will it be possible to do all these and at the same time keeping focussed on the core mandate of saving the natural forests from destruction? Will interaction and involvement of all these groups not mire the project in conflicting interests? Although the mechanism proposes inputs from common people as well as people’s representatives to develop the project, it gives the least space to devise ways to prevent the continued deforestation itself. The mechanism gives importance to livelihood development of the forest dependent people (Section 3) but omits people engaged in non-forest activities but face potential displacement due to the project.		12	The overall objectives of the REDD+ program must primarily address the reduction of greenhouse gas emissions and incentive mechanisms will be based on these objectives under the future climate change agreements. See the new section in the introduction giving the elements that define the REDD+ program. These standards aim to provide additional incentives for high social and environmental performance and will not supplant the overriding incentives for emissions reductions of the financing mechanisms. Each country will need to identify the relevant rights holders and stakeholders, which could very well include people who are not forest-dependent.
11	The whole gamut of activities suggested in the mechanism entails huge costs. Whilst one option can be to fund it upfront through a designated REDD fund but the compulsion or temptation to sell unverified REDD credits upfront to raise money for the project itself cannot be eliminated. But as seen from recent developments, such a scenario may not be appropriate for the project. How encouraging a scenario is where the high cost of REDD prices out the mechanism itself needs to be re-visited before finalizing it.		12	It is widely recognized that significant funding is required for REDD readiness and that the social and environmental aspects addressed by these standards are important elements for the development of effective, equitable and efficient REDD programs and not just an increase in costs for REDD.

12	<p>2.1 Criterion refers to each stakeholder group, but identification of the stakeholder groups is not addressed until Principle 6. Although it is understood that the Principles etc. don't described a time-line in terms of implementation, as a document building one section upon another it might help to have Principle 6 following on from Principle 1 (i.e. Principle 1 concerns identifying and engaging Rights holders, Principle 2 (formerly 6) concerns identifying and engaging stakeholders).</p>		13	<p>The identification of relevant rights holder and stakeholder groups is now addressed in 6.1.</p>
13	<p>The approach proposed here is deeply managerial, in the sense that it tries to anticipate all potential problems and to propose a technical fix to them, technical fixes that will probably require the involvement of many experts. I am not an adept of managerial approaches, not I am obviously biased against the proposition, but hope that my comments will be nevertheless useful. The risk of such a managerial approach are that (1) it will result in very elevated transaction cost that will discourage operators from implementing small REDD projects; (2) It is illusory to believe that all problems can be anticipated and fixed, especially if the technical fix is designed by experts who are external to the concerned society. So managerial approach lead to an infinite regression where new technical fixes are always added as new problems are discovered. This never stops, and we are already here. Participation was the last layer added to managerial approaches. Now it is increasingly criticized, and a new layer, called "representation" is currently added, by experts from the World Resources Institutes for example, as they contributed much to the critique of participation. And this is probably still not the last step. At least, this standard should raise the issue of representation, beyond the issue of participation (see the work of WRI). But even if doing so, I would remain skeptical of the efficiency of managerial approach. (3) it will be biased by the stakeholder who can provide the many technical inputs (expertises) that managerial approaches</p>		14	<p>These standards aim to support programs that give rights holders and stakeholders an effective voice in the design, implementation and evaluation of REDD+ programs so they are not just designed by experts in a top-down way. The transaction costs for effective REDD are always going to be relatively high because of the complexity of measuring and monitoring the emissions reductions and removals. These standards aim to ensure that costs and benefits from REDD are shared equitably with rights holders and stakeholders which will certainly make REDD more equitable and arguably make it more effective and efficient in the long term.</p>

	<p>require. The alternative to such a management approach would be to stick to a small number of very clear indicators and to let stakeholders find their own way to satisfy these objectives, like the level of food security, the proportion of people under the poverty line, the level of resource extraction, or the rate of clearing, would be sufficient, and that less planning and social engineering should be suggested for the monitoring process. We need to be sure about the final outcome, but we may not need to look at the details of how these outcomes are obtained. It will be up to the stakeholders to design their mechanisms, and if they know that inefficient projects are checked out in the end, they may find their ways to be efficient.</p>		
14	<p>I am a bit surprised that there is not more than a single reference to women as a group that is to be singled out (which I found in the last point, 6.1.1, “Stakeholder groups are identified including Indigenous Peoples, local communities, women and other potentially marginalized groups “) I would have thought it would have been mentioned more frequently and in an earlier point, such as under 2.2.1 :” There is effective participation of stakeholders and rights holders in defining the decision-making process and the distribution mechanism for equitable benefit-sharing, including poor and marginalized groups” (defined under the Footnote of number 15: Individuals or groups that are disadvantaged by gender, ethnicity, socio-economic status etc.</p> <p>It remains a monumental effort to get this environment/forestry community to understand our point: that without providing a differentiated space for women, it cannot be assumed that women stakeholders will automatically be able to participate on an equal basis with men. This goes for women of Indigenous People as well of Local Communities. Gender discrimination cuts across all categories of people, at all</p>		15 <p>The standards require that REDD+ programs give special attention to the most vulnerable people including women particularly with respect to benefit sharing and full and effective participation. The definition of ‘the most vulnerable people’ is as follows: ‘The most vulnerable people’ are those with least secure access to the assets on which secure livelihoods are built (social, cultural, human, financial, natural, physical and political) and/or high exposure to external stresses and shocks, including climate change, that may affect these assets and peoples’ ability to use these assets. This category specifically includes individuals or groups that are disadvantaged by gender, ethnicity, socio-economic status etc.</p>

	<p>levels: hence the need to spell out ‘women’ as a group – call them marginalized, but they are better seen as primary forest users and members of forest dependent communities in much of the global South.</p> <p>But then again, at least there are these two references to gender and women...that is more than most. Still , we have high expectations of the CCBA standards, and are hopeful that they can be finalized in a way that supports women’s equal access to participation, consultation and benefit sharing in order to make REDD most effective.</p>			
15		<p><u>Recommendation to re-order principles:</u> Move principle 8 (<i>compliance with local and national laws</i>) closer to principle 1 (<i>rights recognized and respected</i>) due to proximity of both principles. The way it is, it is not fluid for logic comprehension.</p>	17	<p>The order of these principles was proposed during the workshop in Copenhagen in May 2009 and there has been no strong agreement to change the order in subsequent consultations. The participants felt that it was important to deal first with the issue of rights to lands, territories and resources, then with equitable benefits sharing, before focusing on the outcome principles related to benefits to indigenous peoples and local communities, to sustainable development and good governance more generally and to biodiversity and ecosystem services. The process indicators related to participation, access to information and compliance with laws seemed to come more logically at the end.</p>
16		<p>The standards make reference to national REDD+ programs and do not mention other levels of governments that could become proponents for REDD+ programs. It is highly recommended to include subnational level as REDD programs tend to happen (and already are) in subnational levels. Review is suggested in criteria 4.1, 4.2, 7.4 and indicators 1.1.2 and 1.3.1. Also indicator 4.4.1 " <i>An effective and efficient process is established to link the REDD+ program with all relevant ministries and government agencies/organizations</i>" makes reference to what</p>	17	<p>These standards are intended for government-led programs at both national and state/province level. The word ‘national’ is no longer used. An effort has been made to ensure that all the formulations are relevant either to national level programs or those developed at other levels. Note that ‘country-specific interpretation’ refers to interpretation at the level of jurisdiction leading the REDD+ program.</p>

		instances the program has to coordinate with and these are only related to the federal or national level instances, requiring modification or inclusion of other governance instances at subnational levels. The same rationale can be applied to indicator 5.5.1, mentioning only <i>country specific performance targets</i> but also subnational performance targets should be included.		
17		1.1, 2.1 and 6.1 are the initial step for implementation of the principles. It is suggested to analyze the possibility to include them as indicators of following criterion in the same principle. This revision would lead to decreasing the number of criteria favoring objectivity.	17	The importance of these steps justifies maintaining their status as criteria rather than indicators.
18	General Comment: Improve Spanish translation. Also use 'los/las' so as not to have sexist language.		18	For now, the term 'los' is used in Spanish as this is generally understood to include both genders. A review will be made of best practice in other standards and similar documents prior to finalization of the standards.

Principle 1

	Comment	Proposed change	By	Response
19	<p>I find it very appropriate; but for Criterion 1.1 about the identification of rights holders for the land, territory and resources, I believe it is not making specific reference to the indigenous people, because there are some communities that have legal title to the land, as in the case of indigenous regions in Panama, whose legal titles are defined and recognized by the laws of the republic. Therefore, I would add the following to this criterion:</p> <p>The REDD+ policy should ensure that the indigenous people's consultation structures are taken into consideration when defining and requesting consent for REDD +</p> <p>Criterion 1.5 Indicator 1.5.1: in many countries such as</p>	<p>Indicator 1.1.2 should clearly establish that the title of the land is for collective use and the laws which identify the "Indigenous Regions" do not include several title holders, there is only one title, and under it, the indigenous people have a variety of traditional uses for their natural resources. What needs to be identified is who owns the different resources when it comes time to share the benefits. In any case, the Panamanian government charges a very high tax rate and the benefits for forest management are insignificant which makes it very unfair.</p> <p>Criterion 1.3 about free, prior and informed consent requires an indicator that clearly recognizes traditional government structures such as the</p>	2	<p>A new footnote has been added to explain that indigenous peoples and others may hold collective rights as follows "Including holders of individual rights and Indigenous Peoples and others who hold collective rights."</p> <p>The standards include an indicator that requires that the rights holders define the consultation process and structures to obtain their free, prior and informed consent as follows: "1.3.3 Collective rights holders define a verifiable process of obtaining their free, prior and informed consent including definition of their own representative institutions that have authority to give consent</p>

	<p>Panama, the carbon rights have not been defined, therefore any program should take into account a negotiation process with the governments in order to facilitate the recognition of carbon ownership to the indigenous peoples, and the carbon sinks should be evaluated so as to have a clear idea of their value in order to establish environmental enterprises.</p>	<p>Indigenous Congresses and the system of Chiefs for each Indigenous Region. Any consultation should be made within this traditional structure.</p>	<p>on their behalf.” This will ensure that traditional decision-making structures are respected.</p> <p>Rather than requiring negotiation between governments and rights holders over carbon rights, the standards as formulated in 1.5 require that in cases where rights holders can have carbon rights, the carbon rights are based on the rights to the lands, territories and resources that generate the emissions reductions. The standards require that carbon rights are distributed fairly according to lands/territories/resources rights and not enabling some land-owners to get a greater share or even excluding others.</p>
20	<p>1.1.2 comment: in many cases, it may be a problem to identify ALL rights holders</p>	<p>can be 1.1.2 Land-use plans including forest management plans in areas included in the REDD+ program identify the rights of all SIGNIFICANT rights holders and their spatial boundaries.</p>	<p>3</p> <p>The word ‘relevant’ and explanatory footnote have been added to 1.1.2 as follows “1.1.2 Land-use plans including forest management plans in areas included in the REDD+ program identify the rights of all relevant¹ rights holders and their spatial boundaries including any overlapping or conflicting rights.”</p>
21	<p>current 1.4.1 A transparent and accessible mechanism of local/community/national mediation to resolve any disputes over rights to land, territories and resources related to the REDD+ program is developed and functional. comment: developing such a mechanism may take too long and this may impede advance of some national processes</p>		<p>3</p> <p>A mechanism to resolve disputes over rights to lands, territories and resources relevant to the REDD+ program is an extremely important element for the success of REDD+ activities. A requirement for this mechanism to be functional does not require that all disputes have been resolved. A safeguard has been included in criterion 1.4 to prevent the implementation of activities that may affect the outcome of a dispute but to enable other activities to proceed even before disputes are effectively resolved. “1.4 The REDD+</p>

¹ ‘Relevant’ rights holders are identified by the REDD+ program in accordance with criterion 6.1.

				program identifies and uses a process for effective resolution of any disputes over rights to lands, territories and resources related to the program and does not proceed with any activity that could prejudice the outcome of the dispute resolution process.”
22		1.1.1last line: There seems an “and” is not fitting, i.e. it should read: “including any overlapping or conflicting rights.” 1.2.3first line: delete the 6 in “rights6”	5	These grammar/formatting errors have been corrected.
23	REDD countries or developing countries? It is quite confusing, because such categories may not be acceptable for all developing countries?		6	The reference to REDD countries has been modified in the introduction to the standards as follows “The majority of committee members are from countries where REDD would be implemented recognizing that governments and civil society from these countries should lead the adoption of the standards.”
24		1.1.1 A process and system is established to inventory and map existing statutory and customary land, territories and resources tenure/use/access/management rights (including those of women and other potentially marginalized groups/ communities) relevant to the program including and any overlapping or conflicting rights. 1.1.2 Land-use policies and plans including forest management plans in areas included in the REDD+ program identify the rights of all rights holders and their spatial boundaries. 1.2 The REDD+ program respects and recognizes both statutory and customary rights to land, territories and resources which Indigenous Peoples or local communities have traditionally managed , owned and occupied or otherwise used or acquired	6	1.1.1 addition of ‘system’ and ‘communities’ are not needed to enhance clarity. 1.1.2 , 1.2.1 Addition of ‘policies’ is not needed since this indicator is related to the implementation rather than the policy framework. 1.2 , 1.2.3 adding the word ‘managed’ would not be consistent with the language in UNDRIP Art 26 1.3 , 1.3.1, 1.3.2, 1.3.4, 1.3.5, 1.4 the word ‘full’ is not required before free, prior and informed consent which is already explicit and conforms to UNDRIP. 1.4 Disputes is an appropriate word and does not need addition of ‘conflicts’

		<p>1.2.1 Land-use policies and plans including forest management plans in areas included in the REDD+ program recognize customary and statutory rights of Indigenous Peoples and local communities.</p> <p>1.2.3 The REDD+ program promotes securing statutory rights to land, territories and resources which Indigenous Peoples or local communities have traditionally managed, owned and occupied or otherwise used or acquired.</p> <p>1.3 The REDD+ program requires the full, free, prior and informed consent of all rights holders for any activities affecting their rights to lands, territories and resources.</p> <p>1.3.1 The policies of the National REDD+ program uphold the principle of full, free, prior and informed consent of rights holders for any activities affecting their rights to lands, territories and resources.</p> <p>1.3.2 The REDD+ program effectively disseminates information about the requirement for full, free, prior and informed consent of rights holders for any activities affecting their rights to lands, territories and resources.</p> <p>1.3.4 Collective rights holders define a verifiable process of obtaining full, free, prior and informed consent including who has authority to give consent on their behalf.</p> <p>1.3.5 Full, free, prior and informed consent is obtained from all rights holders for any activities affecting their rights to lands, territories and resources following the agreed process.</p> <p>1.4 The REDD+ program includes a process to resolve any conflicts/disputes over rights to land, territories and resources related to the program</p>		
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		based on the full , free, prior and informed consent of the parties involved.		
25	1.1 Comments: We consider appropriate to supplement the above criterion setting as a goal of such identification, the respect for the statutory and customary collective rights, including overlapping rights in natural protected areas.	Suggested amendment: 1.1 The REDD+ program effectively identifies the different rights holders (statutory and customary) and their rights to the land, territories and resources relevant to the program as a measure for recognizing and respecting the collective rights of the local peoples and communities, established basically in the United Nations Declaration on the Rights of Indigenous Peoples, respecting and ensuring the right to full and effective participation, and free prior and informed consent.	9	The requirements for full and effective participation (principle 6) and free, prior and informed consent (criterion 1.3) are included in other parts of the standard.
26	1.2 Comments: The REDD+ program should ensure respect for the traditional management systems as well as the systems that govern the use and collective management of the land and territories of the indigenous peoples and local communities, since these elements, among others, have had an impact on the conservation and sustainable use of the natural resources. Likewise, it should comply with Article 8j of the Convention on Biological Diversity which states that the “knowledge, innovations and practices of indigenous and local communities embodying traditional lifestyles relevant for the conservation and sustainable use of biological diversity and promote their wider application with the approval and involvement of the holders of such knowledge, innovations and practices and encourage the equitable sharing of the benefits arising from the utilization of such knowledge, innovations and practices.”	Suggested amendment: 1.1.2 The land use plans, including forest management plans in areas included in the REDD+ program, identify the rights of all rights holders and their spatial boundaries; likewise it ensures respect for full and effective participation, for free prior and informed consent, as well as for the regulatory systems and traditional management systems of the indigenous peoples and local communities.	9	Free, prior and informed consent is required in 1.3. Full and effective participation based on rights to lands, territories and resources relevant to the REDD+ program are required in Principle 6 while respect for and building on regulatory systems and traditional management of Indigenous Peoples and local communities are required in 6.6.
27	Comments: Not only is free prior and informed consent required, but also a consultation and full and effective participation; but not as requirements but as collective rights established in international standards such as the United Nations Declaration on the Rights of the Indigenous Peoples, among others. Added to this, the respect for the right to free prior and informed consent, and to a consultation, cannot take the form of briefing	Suggested amendment: 1.3 The REDD+ program requires the need to ensure respect for the right of the rights holders to full and effective participation, as well as to a consultation and to free prior and informed consent for any activities affecting their rights to the land, territories and resources.	9	The rights of rights holders to consultation and to full and effective participation are required in Principle 6.

	meetings, it should be a process whose guidelines have to be mutually agreed with the indigenous peoples and local communities, based on terms established in the 169 ILO Convention and the United Nations Declaration on the Rights of the Indigenous Peoples.			
28	1.1.2 Comment: REDD should be consistent with land and water resource management (if not considered in the other principles)	1.1.2 Land-use plans consistent with sustainable development including forest management plans in areas included in the REDD+ program identify the rights of all rights holders and their spatial boundaries.	10	Consistency and coherence with sustainable development are required in Principle 3 for Indigenous Peoples and local communities and in Principle 4 for broader aspects of sustainable development.
29	1.2.1 Comments: a) Recognition may be granted either thru legislation or policy; CLUP formulation should be participatory and multi-sectoral and must comply with sustainable landuse plans; b) Landuse plans in Philippines do not assure compliance as seen by inundation of PA/watershed portions for a dam; we already converted our farmlands and forests into settlements and they are consistent land use plans 1.2.2 Comment: Our Indigenous and Peoples Rights Act (IPRA) is a law recognizes IPs however, the same titled ancestral lands are often used for other development projects that are the priority agenda of the government ie mining; In such a case, what is a stronger indicator for “recognition		10	These comments are relevant for country-specific interpretation of the standards and can be used to help formulate effective country-specific indicators for the Philippines.
30	1.3.3 Comment: should consider all existing processes and not only as defined by existing laws since we have seen several cases in the Philippines where consent is manipulated		10	This comment is relevant for country-specific interpretation of the standards and can be used to help formulate effective country-specific indicators for the Philippines.
31	1.2 Criteria In the criteria section it states that the “REDD+ program respects and recognizes...,”and in the framework indicators there is no mention of respect in the 3 indicators. In my experience governments etc can recognize rights but it’s another thing to actually respect them...that is no to infringe or impede rights.		11	‘Respect’ has been included in the framework for indicators as follows: 1.2.1 The policies of the National REDD+ program include recognition of and respect for the customary rights of Indigenous Peoples and local

	1.3 As a suggestion CIEL was working on a process document for FPIC so it may be useful to use as an annex to the standards...not sure if it's done yet.		<p>communities.</p> <p>1.2.2 Land-use plans including forest management plans in areas included in the REDD+ program recognize and respect customary and statutory rights of Indigenous Peoples and local communities.</p> <p>The CIEL document on FPIC and other relevant documents should be referenced in guidance on use of the standards to be developed at a later stage.</p>
32	1.1.1 comment: It may help to add a couple of words describing the required 'quality' of this process (participatory, involving whom etc.)		<p>13</p> <p>'participatory' has been included as follows:</p> <p>1.1.1 A participatory process is established to inventory and map existing statutory and customary lands, territories and resources tenure/use/access/management rights (including those of women and other potentially marginalized groups) relevant to the program including any overlapping or conflicting rights.</p>
33	1.1.2 comment Add a note (or indicator) to address situations where rights are contested – for example customary claims that are not recognised by the State, or claims/borders that are disputed between 2 or more communities. Although this is partly addressed under 1.4, what about cases where they are not resolved (even through decision of a court of law for example, where one or other party might not accept the decision)		<p>13</p> <p>1.1.2 has been modified to require the recognition of any overlapping or conflicting rights as follows:</p> <p>1.1.2 Land-use plans including forest management plans in areas included in the REDD+ program identify the rights of all relevant² rights holders and their spatial boundaries including any overlapping or conflicting rights.</p> <p>Note that conflicts are addressed in 1.4.</p>
34	1.2 comment: How will long-standing disputes of customary rights be addressed? For example, contested		<p>13</p> <p>Framework indicator 1.2.3 requires the REDD+ program to promote securing</p>

² 'Relevant' rights holders are identified by the REDD+ program in accordance with criterion 6.1.

	rights over National Parks and other PAs that were established several generations ago and/or under colonial governments? This may be especially relevant to meeting indicator 1.2.3 on “securing statutory rights to lands... which IPs or LCs have traditionally owned or occupied”			statutory rights but the specific indicators relevant to each country will be developed during the country-specific interpretation.
35	Footnote: It may be important to point out that these indicator elements are not alternative options but form an integrated set (for example 1.3.4 requires delivery of 1.3. which in turn requires delivery of 1.3.2 etc.)		13	It will be made clear in the guidance for country-specific interpretation that all the elements of the framework for indicators are important elements for delivery of the criterion.
36	1.1.2 There is a significant risk that these land use plans, even if established in a participatory manner, will result in defining management objectives and land uses that will not be those wished by the communities, but will rather reflect the wishes of the NGOs and other partners who provide expertise and guidance to the process. If this happened (and experience shows that this tendency is quite frequently observed, even in land use planning exercises that use a participatory approach), the outcome could be less rights; not more rights. This issue should be explicitly addressed.		14	The requirement for full and effective participation of all relevant rights holders and stakeholders in program design, implementation and evaluation is covered in 6.2. the following footnote has been added to the development of land use plans and forest management plans in 1.1.2 “Recognizing that any land use and forest management plans developed under the REDD+ program should be developed with full and effective participation of all relevant stakeholders and rights holders in accordance with criterion 6.2”
37	1.2.1 ‘recognize and respect customary and statutory rights’ This expression is quite vague. Something should be said about how this recognition is done. For example, Land-use plans could be superposed to existing land use maps, and if any difference is observed, explanation could be given.		14	This version of the standards provides a framework for indicators and more explicit guidance on how to achieve the indicators should be included in the country-specific interpretation.
38	1.3 There should be a legally binding mechanism here. Otherwise, the free prior consent will be only intentional. Every country has sovereignty to define its own legal mechanism, but a boundary between what is legally binding and what is not should be defined. Otherwise, statements of prior consent will take the form of vague declarations signed during workshops organized by NGOs. This is not what we want.		14	1.3.1 requires that policies of the REDD+ program and thus of the government uphold the principle of free, prior and informed consent.

39	1.5 I don't understand clearly the idea. Ownership rights and use rights have to be distinguished. Both can concern land, territory and/or resources. I think that an historical perspective should be considered. If the rights that matter are only those existing at the time of project start, there will be a rush to grab these rights before the project start. If only historically constituted rights can be considered, such a resources and land grabbing becomes beside the point. This looks like rendering things more complicated, but actually renders them simpler if the objective is impact in term of reduced deforestation, not "result" in term of project implementation.		14	1.5 The different ownership and use rights to lands, territories and resources relevant to the REDD+ program must be defined in accordance with Criterion 1.1. Whether historical rights or current rights are respected must be defined at this stage for the entire program and not just for the allocation of carbon rights. This criterion 1.5 requires that allocation of carbon rights is based on the rights identified under 1.1 and fairly reflects the different kinds of rights.
40		1.1 The REDD+ program ² effectively identifies the different rights holders (statutory and customary ³) and their rights to land, territories, carbon and resources relevant to the program.	15	A footnote has been added to 'resources' in Principle 1 as follows: 'Resources' is understood to include ecosystem services provided by these resources. It is not appropriate to explicitly mention carbon because each country will define whether carbon rights can or cannot be privately owned. Criterion 1.5 deals with cases where carbon rights can be privately owned.
41	1.2.3 does not make clear the understanding of the sentence <i>The REDD+ program promotes securing statutory rights.</i>		17	The footnote to 1.2.3 explains that this includes securing existing statutory rights and conversion of customary rights to statutory rights.
42	The Brazilian standards address the issue of criterion 1.5 more straight forward and defines the ownership of the benefits generated in REDD to the stakeholders who generate the service. I believe the international standard criterion 1.5 has somehow to be broader and address different situations in different countries, but new wording for the international criterion 1.5 would help the comprehension.		17	The requirement for fair sharing of benefits among rights holders and stakeholders is covered in Principle 2. It seems more problematic to require ownership of the benefits although this may be relevant in some countries and under some circumstances. This is an issue that can be addressed with clearer guidance during country-specific interpretation.
43	<u>P1</u> : The definition of <i>stakeholders</i> and <i>rights holders</i> is not clear and sometimes they are used in a manner that		17	The use of the terms 'rights holders' and 'stakeholders' has been made more consistent

	generates confusion. It is highly recommended to define each of the terms and revise the document to keep references identical to the given nomenclature.			and is clarified in a footnote as follows: 'Rights holders' are those whose rights are potentially affected by the REDD+ program and 'stakeholders' are those whose interests are potentially affected by the program.
44	1.1 What are the relevant resources of the program		18	A footnote has been added to 'resources' in Principle 1 as follows: 'Resources' is understood to include ecosystem services provided by these resources. The lands, territories and resources relevant to the program must be defined by the REDD+ program. A new Introductory Section to the standards requires a description of the program, its objectives, activities and the geographical areas of implementation.
45	1.1.2 Forest management plans (FMP): are FMPs needed to participate in REDD? Who does the FMP? Communities? Government? Suggestions (2 alternatives): 1. Management plan as to be done by the community (or include the community) and the State (for the national REDD plan) 2. State Guidelines – community decides		18	The nature of land use or forest management plans would need to be defined by each country and more specific indicators could be developed during country-specific interpretation. The requirement for full and effective participation of all relevant rights holders and stakeholders in program design, implementation and evaluation is covered in 6.2. The following footnote has been added to the development of land use plans and forest management plans in 1.1.2 "Developed with full and effective participation of all relevant stakeholders and rights holders in accordance with criterion 6.2"
46	1.2.1 Question: who recognizes? Where are they recognized? The State recognizes? – following the logic of a national project Question: is the forest use plan the 'correct' place to recognize rights? 1.2.3 Exercise of rights	1.2.1 For use plans include collective title holder. 1.2.2 should go before 1.2.1	18	These standards are applied to government-led REDD+ programs, and therefore recognition of and respect for rights by the REDD+ program implies government engagement through the REDD+ policies and measures. It is important that rights to lands, territories and resources that have a spatial dimension

				are recognized and respected in any land use and forest management plans related to the REDD+ program.
47	1.3 Ecuador's national context: possible conflicts between what the standards say and the constitution 'free, prior, informed consent'.		18	While the constitution may not require free, prior and informed consent this presumably does not preclude adoption of free, prior and informed consent within the REDD+ program. Any conflicts between national circumstances and the standards would need to be addressed in the country-specific interpretation.
48	1.4.1 We like this but we have to define who defines this process. Make sure that collective title holders are included.	1.4.1 A transparent and accessible mechanism of local/community/national mediation to resolve any disputes over rights to land, territories and resources and benefit-sharing or other issues related to the REDD+ program is developed and functional. 1.4.2 A new formulation is suggested. ...' include that the mechanism should specify the adequate/sufficient time for solving disputes' and be resolved in a timely manner.	18	Collective rights holders are included in the identification of rights holders in accordance with 1.1. A process for resolving complaints related to benefit-sharing is required in 2.2.5. 1.4.2 is formulated as follows: 1.4.2 Disputes over rights to lands, territories and resources created by the REDD+ program are resolved in a timely manner within an agreed time frame. The adequate/sufficient time will be defined during country-specific interpretation.
49	1.5 The carbon rights MUST benefit the collective title holders	Formulate this criterion better Make the indicator more specific, for example add 1 A transparent and participatory process for defining carbon rights is developed and implemented based on the statutory and customary rights to the land, territories and resources (as identified in 1.1) that generated the greenhouse gas emissions reductions and removals.	18	The process does not necessarily need to be participatory in order to ensure a fair outcome. The allocation of carbon rights should be based on recognized and respected rights to lands, territories and resources that generated the carbon benefits and should not need to be negotiated.

Principle 2

	Comment	Proposed change	By	Response
50	comment: There is a need for participation of main stakeholders in designing the national framework, not just to be informed.	can be 2.2.2 Clear guidelines for benefit-sharing are AGREED, established, disseminated and followed.	3	'agreed' has been added as follows: 2.2.2 Clear guidelines for benefit-sharing are agreed, established, disseminated and followed.
51	comment: Include ALL possible stakeholders may become an endless task.	can be 2.3.2 Stakeholders and rights holders participate effectively in the reporting and review of costs, revenues and other benefits and how they are distributed taking into account the initial analysis of projected costs, revenues and other benefits and associated risks for each stakeholder group DEFINED AS IN 6.1.	3	A footnote has been added to 2.1 as follows 'Relevant rights holder and stakeholder groups' are identified in accordance with criterion 6.1.
52		Principle 2, 2.2.1, Principle 6, Principle 7, 7.1.1: Delete "and rights holders". The definition given for stakeholders (footnote 11) already includes the "rights holders".	5	There is now consistent use of the term rights holders and stakeholders recognizing that they are different groups as defined in the following footnote: 'Rights holders' are those whose rights are potentially affected by the REDD+ program and 'stakeholders' are those whose interests are potentially affected by the program.
53	Stakeholders have not or may not carbon rights, therefore, it may be difficult to sharing the benefit with/between stakeholders.		6	Depending on national policies, different REDD+ programs may or may not enable private ownership of carbon rights. In addition, the carbon rights may not represent the full range of benefits of the REDD+ program. These standards promote the equitable sharing of benefits based on rights, costs and risks of different rights holders and stakeholders.
54	It should be made clear that costs are not just financial but also can be social costs like losing knowledge or deteriorating community collaboration.		8	The footnote associated with 2.1 has been modified as follows: All analysis of costs, benefits and risks should include those that are direct and indirect and include social, cultural and

				economic aspects. Costs should include opportunity costs. All costs, benefits and risks should be compared against the reference scenario which is the most likely land-use scenario in the absence of the REDD+ program.
55	The process for establishing equitable benefit sharing should not only be participatory but should also include all the community.		8	<p>To ensure that the most vulnerable people are included in definition of the equitable benefit sharing process the following text has been included.</p> <p>2.2.1 There is effective participation of relevant rights holders and stakeholders in defining the decision-making process and the distribution mechanism for equitable benefit-sharing, including the most vulnerable people.</p> <p>Rather than referencing the ‘poor and marginalized’ the term ‘most vulnerable people’ is used with the following footnote: ‘The most vulnerable people’ are those with least secure access to the assets on which secure livelihoods are built (social, cultural, human, financial, natural physical and political) and/or high exposure to external stresses and shocks, including climate change, that may affect these assets and peoples’ ability to use these assets. This category specifically includes individuals or groups that are disadvantaged by gender, ethnicity, socio-economic status etc.</p>
56	Stakeholders have not or may not have carbon rights, therefore, it may be difficult to sharing the benefit with/between stakeholders.	Remove ‘stakeholders’ from Principle 2: The benefits of the REDD+ program are shared equitably among all rights holders.	6	Depending on national policies, different REDD+ programs may or may not enable private ownership of carbon rights. In addition, the carbon rights may not represent the full range of benefits of the REDD+ program. These standards promote the equitable sharing of benefits based on rights,

				costs and risks of different rights holders and stakeholders.
57		2.1, 2.1.2 Add 'rights holders'	6	Rights holders have been added to 2.1 and 2.1.2.
58		<p>2.2 A transparent, participatory, effective and efficient process is established for equitable sharing of benefits of the REDD+ program taking into account costs, benefits and associated risks.</p> <p>2.2.1 There is effective participation of rights holders and stakeholders in defining the decision-making process and the distribution mechanism for equitable benefit-sharing, including forest-dependent poor and marginalized groups.</p> <p>2.2.2 Clear policies and guidelines for benefit-sharing are established, disseminated and followed.</p>	6	<p>The following modifications have been made:</p> <p>2.2 Transparent, participatory, effective and efficient³ mechanisms are established for equitable sharing of benefits of the REDD+ program among and within relevant rights holder and stakeholder groups taking into account costs, benefits and associated risks.</p> <p>2.2.1 There is effective participation of relevant rights holders and stakeholders in defining the decision-making process and the distribution mechanism for equitable benefit-sharing, including the most vulnerable people.</p> <p>2.2.2 Clear policies and guidelines for benefit-sharing are developed, agreed, disseminated and followed.</p>
59	Comments: The analysis of costs, profits, benefits and risks associated with the REDD+ program projects should ensure the implementation of in-depth environmental and cultural impact studies based on the Akwé: Kon Guidelines, including an analysis of the legal framework based on the United Nations Declaration on the Rights of the Indigenous Peoples and other instruments of collective rights.	<p>Suggested amendment: 2.1.1 The projected costs, profits, and other benefits and associated risks are identified for each stakeholder group identified in 6.1, considering the indigenous peoples and local communities as legal persons with collective and customary rights. Likewise, in-depth environmental and cultural impact studies are carried out based on the Akwé: Kon Guidelines.</p> <p>2.2.1 The right to full and effective participation of the stakeholders and rights holders is ensured in defining the decision-making process and the distribution</p>	9	<p>The footnote associated with 2.1 has been modified as follows to ensure that cultural impacts are assessed:</p> <p>All analysis of costs, benefits and risks should include those that are direct and indirect and include social, cultural and economic aspects. Costs should include opportunity costs. All costs, benefits and risks should be compared against the reference scenario which is the most likely land-use scenario in the absence of the REDD+ program.</p>

³ 'Efficient' is defined as achieving the target with minimum cost, effort and time.

		mechanism for equitable benefit-sharing, including poor and marginalized groups.		2.2.1 There is full and effective participation of relevant rights holders and stakeholders that want to be involved , including the most vulnerable people, in defining the decision-making process and the distribution mechanism for equitable benefit-sharing among and within relevant rights holders and stakeholder groups..
60	<p>2.1.1 Who will analyze costs, etc...will this be a participatory process at some point? This could be questioned and then you reference it in participatory processes later in indicators.</p> <p>2.2.1 in this indicator “poor and marginalize groups” (this term is used throughout the standards) should it be vulnerable groups ? This has been terminology that we have used and was being used more globally. Also, should this indictor also reference FPIC as well?</p>		11	<p>Use of a participatory process and the term vulnerable groups have been added to 2.2.1 as follows:</p> <p>2.2.1 There is full and effective participation of relevant rights holders and stakeholders that want to be involved , including the most vulnerable people, in defining the decision-making process and the distribution mechanism for equitable benefit-sharing among and within relevant rights holders and stakeholder groups..</p>
61	<p>Although the success of a long-term effective REDD project hinges on an effective and equitable benefit sharing mechanism (Criterion 2.2: Equitable benefit sharing.), but the mechanism should also include the responsibilities and the commitments of the stakeholders in proportion to their capabilities and role in the project. Though the poor and marginalised groups may only some limited resources and means to support the entire program, they should have roles and responsibilities commensurate with their decision making and management stake in the project. This will help in creating an-ecosystem services based “income” rather than a ”charity” for the communities. The requisite skills to conduct the roles should be imparted along with the dissemination of knowledge about the</p>		12	<p>Full and effective participation in the design, implementation and evaluation of the REDD+ program is included in Principle 6 and criterion 6.2. However, there is no requirement for participation and taking responsibility in order to be eligible for benefits.</p>

	project. Equitable benefit sharing should go hand in hand with equitable involvement in REDD projects.			
62	2.2.1 and 2.3.1 What is “effective participation” ?		14	A footnote has been added as follows: ‘Full and effective participation’ means meaningful influence of all relevant rights holders and stakeholders who want to be involved throughout the process, ensuring they have prior access to adequate information.’
63	2.2 It sounds like if the benefit sharing mechanism will be designed by experts, who will “establish guidelines”, define “administrative procedures”, “review options”, etc. We may have no choice but this “administrative rationalism” may quickly be at odd with bottom up processes. What about giving a deadline to the recipients of REDD payments to define their mechanism of benefit sharing themselves, and then assess and negotiate their proposition?		14	There is significant requirement for full and effective participation of rights holders and stakeholders in the design, monitoring and evaluation of equitable benefit-sharing. See 2.1, 2.2 and 2.3.
64	2.3 What is a “transparent and participatory monitoring” ?This is a general comment for the overall proposition: the suggestions are too vague to be efficient assessment tools.		14	More explicit indicators can be defined at the stage of country-specific interpretation.
65	the depth and feasibility of indicator 2.3.2 is not clear		17	This will be made more specific during country-specific interpretation.
66	P2: Question: Has REDD thought about how ‘benefits’ will be distributed within the community? Costs would be better written as ‘costs/benefits’ and should include both indirect and direct costs/benefits. Need to use the correct terms and specify them in the		18	These points are covered by the following wording and footnotes: 2.1 The projected costs, potential benefits and associated risks ⁴ of the REDD+ program are identified for relevant rights holder and stakeholder groups ⁵ at all levels ⁶ using a participatory process.

⁴ All analysis of costs, benefits and risks should include those that are direct and indirect and include social, cultural and economic aspects. Costs should include opportunity costs. All costs, benefits and risks should be compared against the reference scenario which is the most likely land-use scenario in the absence of the REDD+ program.

⁵ ‘Relevant rights holder and stakeholder groups’ are identified in accordance with criterion 6.1.

⁶ At local, national and other relevant levels.

	footnote.			
67	2.1 Should be clearer that this is about the program. And need to 'verify' who is responsible for this.		18	2.1 clearly refers to the costs, benefits and risks of the REDD+ program and thus the owners of the program, the government, is responsible for the analysis.
68	2.2 REDD should promote the establishment of a mechanism for this within the communities.. 1.4.2 can be included here in 2.2.5. Justification: Its part of the same process, but more explicit.	2.2.5 Change 'disputes' to 'complaints'	18	A requirement for participatory development of equitable benefit sharing mechanisms 'among and within relevant rights holders and stakeholder groups' has been added to 2.2.1. 1.4.2 refers to disputes over lands, territories and resources whereas 2.2.5 refers to complaints over equitable benefit-sharing. 2.2.5 Change 'disputes' to 'complaints' is a comment that will be dealt with in the Spanish translation
69	2.3.2 There should be an adjudicator (3rd party) , agreed by all parties. Justification: for objectivity.		18	Full and effective participation is a means of ensuring a fair and equitable outcome. The option of using an independent 3 rd party will defined during country-specific interpretation.

Principle 3

	Comment	Proposed change	By	Response
70	Indicator 3.2.6: not all the indigenous people depend on the forest, their use is rather traditional, however, it is an activity that should be considered complementary to the productive activities, it can help improve the livelihood over the medium and long term, the REDD program, should establish adequate conditions to develop community development plans whose management could be led by the community members themselves.		2	The term ‘forest-dependent peoples’ has been replaced with ‘Indigenous Peoples and local communities’. The term ‘enhancing well-being’ of Indigenous Peoples and local communities has also been adopted. 3.2 requires that the relevant communities define the form that the benefits will take.
71	current 3.1.5 National livelihood poverty monitoring shows improvements in areas where REDD+ program activities are implemented. comment: perhaps this can be moved to an evaluation and monitoring section, and not being considered as an indicator		3	This indicator has been moved to principle 4 – 4.1.5 because it seems more relevant to contribution of the REDD+ program to sustainable development and poverty reductions strategies.
72	The term ‘alleviate’ poverty is better suited to an illness. ‘Reduce’ poverty would be better. Poverty is also very subjective.	Consider changing to ‘reduce poverty’. Or even to ‘improving livelihoods’. Need to make sure that this includes elements beyond financial issues and basic needs but also embraces cultural and spiritual aspects.	8	‘Sustainable livelihoods and poverty alleviation’ has been replaced with ‘long-term livelihood security and enhancing well-being’. Both livelihoods and well-being include cultural and spiritual aspects. This is explicitly referred to in the following footnote on ‘livelihoods’: ‘Livelihoods’ are based on social, cultural, human, financial, natural, physical and political capabilities/assets.
73	Indigenous peoples object to use of the term ‘poverty’. That is other people’s perception of our lives but we don’t feel poor. We fight against being labeled as ‘poor’.	Maybe need to clarify that ‘reducing poverty’ does not apply to all IP and LCs but only those for which it is relevant.	8	‘Sustainable livelihoods and poverty alleviation’ has been replaced with ‘long-term livelihood security and enhancing well-being’.
74	IPs object to the term ‘forest-dependent’. We do not depend on the forest, we live with it.	Consider using IPs and LCs consistently throughout the text. Forest-dependent could be used to broaden the term LCs to include some groups that depend on the forest who may not be local – eg nomads? Forest-dependent should not be used as an umbrella term for IPs and LCs.	8	The term ‘forest-dependent peoples’ has been replaced with ‘Indigenous Peoples and local communities’

75	Indicator 3.2.6: not all the indigenous people depend on the forest, their use is rather traditional, however, it is an activity that should be considered complementary to the productive activities, it can help improve the livelihood over the medium and long term, the REDD program, should establish adequate conditions to develop community development plans whose management could be led by the community members themselves.		8	The term 'forest-dependent peoples' has been replaced with 'Indigenous Peoples and local communities'. The term 'enhancing well-being' of Indigenous Peoples and local communities has also been adopted. 3.2 requires that the relevant communities define the form that the benefits will take.
76	The importance of phrase'forest-dependent' is significant, however due to lack of clarity, if we use only 'forest-dependent communities', sometime it creates confusion for identification and recognition of such communities (for example: many people who are not involving in management of forests, but depend on the forest resources. Are they forest-dependent communities or not?)		6	The term 'forest-dependent peoples' has been replaced with 'Indigenous Peoples and local communities'.
77		<p>3.1 The REDD+ program leads to additional and long-term livelihood and poverty alleviation benefits, emphasizing the forest-dependent poor and marginalized.</p> <p>3.1.1 The objectives of the REDD+ program include making a significant contribution to sustainable livelihoods and poverty alleviation for forest-dependent poor peoples and marginalized groups.</p> <p>3.1.5 National livelihood and poverty monitoring shows improvements in areas where REDD+ program activities are implemented.</p>	6	<p>These criteria and indicators have been changes as follows:</p> <p>3.1 The REDD+ program is generating additional, positive impacts on the long-term livelihood security and well-being of Indigenous Peoples and local communities, with special attention to the most vulnerable people.</p> <p>3.1.1 The objectives of the REDD+ program include improving long-term livelihood security and well-being of Indigenous Peoples and local communities.</p> <p>3.1.5 has become 4.1.5 as follows:</p> <p>4.1.5 National livelihood, poverty and other millennium development goal monitoring shows improvements in areas where REDD+ program activities are implemented.</p>
78	P3 Comments: The contributions from the REDD+	Suggested Amendment: The REDD+ program	9	Criterion 3.2 addresses this point as follows:

	program to sustainable livelihoods and poverty alleviation for forest-dependent people, should ensure the respect for the right to free prior and informed consent and should be culturally appropriate; therefore it should ensure full and effective participation of the indigenous peoples and local communities in the entire process.	contributes to sustainable livelihoods and poverty alleviation for forest-dependent peoples based on the respect for the right to self determination and development.		3.2 The relevant Indigenous Peoples and local communities determine the way in which the REDD+ program improves their long-term livelihood security and well-being through an inclusive and transparent process.
79	3.3 Comments: In addition to the impact assessment, the right to free prior and informed consent, and dissent, should be guaranteed throughout the entire process.	Suggested amendment: 3.3 There is participatory assessment of positive and negative livelihood and poverty impacts of the REDD+ program including both predicted (i.e. social impact assessment) and actual impacts, and respect for the right to free prior and informed consent, and dissent, in all stages of the process	9	Full and effective participation is a means of ensuring that all activities are approved by the relevant rights holders and stakeholders.
80	3.1.5 Comments: should be forest-friendly and not dole-outs	<p>3.1 The REDD+ program leads to additional and long-term livelihood and poverty alleviation benefits, emphasizing the poor and marginalized and vulnerable (include in entire doc as appropriate)</p> <p>3.1.2 Poor and marginalized and vulnerable groups are identified among the forest-dependent peoples participating in the REDD+ program.</p> <p>3.1.3 Communities of the forest-dependent peoples, including poor and marginalized and vulnerable groups, acknowledge that they have received benefits from participation in the REDD+ program.</p> <p>3.1.5 National livelihood poverty monitoring that includes MDGs shows improvements in areas where REDD+ program activities are implemented.</p>	10	<p>The term ‘the poor and marginalized’ has been replaced with ‘the most vulnerable people’ explained with a footnote as follows: ‘The most vulnerable people’ are those with least secure access to the assets on which secure livelihoods are built (social, cultural, human, financial, natural physical and political) and/or high exposure to external stresses and shocks, including climate change, that may affect these assets and peoples’ ability to use these assets. This category specifically includes individuals or groups that are disadvantaged by gender, ethnicity, socio-economic status etc.</p> <p>3.1.5 has become 4.1.5 as follows: 4.1.5 National livelihood, poverty and other millennium development goal monitoring shows improvements in areas where REDD+ program activities are implemented.</p>
81	3.3	3.3 There is participatory assessment of positive and negative livelihood and poverty impacts of the	10	Environmental impacts are assessed in principle 5.

		REDD+ program including both predicted (i.e. environmental , social impact assessment ⁷) and actual impacts. New Indicator 3.3.3 Environmental impact assessment of livelihood activities and poverty alleviation shows no adverse impacts		
82	It might be good to have 3.2 go before 3.1 I would think that the definition of how REDD+ programs improves livelihoods, etc should come before the “long-term livelihood etc, benefits that will provide the indicator for measure.		11	In general, a format has been adopted putting the impact criteria and indicators before the process ones.
83	P3 If in the future is expanded beyond forests to grasslands etc. then may need to address the specification of ‘forest-dependent’ peoples. Also, how is ‘forest-dependent’ defined? What about communities 100 miles downstream who <u>depend</u> on forests for watershed service functions		13	The term ‘forest-dependent peoples’ has been replaced with ‘Indigenous Peoples and local communities’
84	3.1.1 or 3.2.1 Maybe include a footnote on poverty, explaining especially the multi-dimensional aspects and that how poverty is understood and experienced differs across countries and cultures – and on how the poor are often the most reliant on healthy ecosystems.		13	‘Sustainable livelihoods and poverty alleviation’ has been replaced with ‘long-term livelihood security and enhancing well-being’. Both livelihoods and well-being include cultural and spiritual aspects. This is explicitly referred to in the following footnote on ‘livelihoods’: ‘Livelihoods’ are based on social, cultural, human, financial, natural, physical and political capabilities/assets.
85	3.1.4 Does this need to be measured against a ‘business as usual’ scenario, or even against alternatives (for example a tea [or oil palm!] plantation which might bring jobs, roads and other rural infrastructure and services?!)		13	A footnote has been included as follows: Increased resources should be compared against the reference scenario which is the most likely land-use scenario in the absence of the REDD+ program.

⁷ Social impact assessment should include social, cultural and economic impacts and a risk analysis.

86	3.1 These propositions are too vague. Some operators may claim they have positive impact by increasing yield and/or income, whereas yield and income increase do not necessarily improve the economy. Some economic tools exist (cost benefit analysis) that enable to evaluate more objectively livelihood and poverty issues. These tools do not say everything, but they should be a minimum. Measurements of income + production, caloric intake, food security, etc.. with a comparison of post project situation with a baseline, should be mandatory. This does not require state of the art methodology and can be done at very low cost.	14	The standards require REDD+ programs to do an analysis of the projected costs, potential benefits and associated risks ⁸ of the REDD+ program are identified for relevant rights holder and stakeholder groups ⁹ at all levels ¹⁰ using a participatory process in accordance with criterion 2.1.
87	3.3.1 'a participatory process' Meaning? Participation raises the issues of accountability and representation. How will they be addressed?	14	Issues of accountability and representation are addressed in Principle 6.
88	3.4.1 Does mitigation imply compensation? What if the mitigation measure does not work; does not suffice to compensate for the loss? Will it be required to design mitigation strategies (which, experiences shows, often fail to compensate) or will it be required to implement something that ACTUALLY compensates for some costs or losses?	14	The word 'effectively' as been added as follows: 3.4.1 Measures are developed and implemented ¹¹ to effectively mitigate potential and actual negative, and enhance positive, impacts on Indigenous Peoples and local communities in general, and the most vulnerable people in particular, both during the design and implementation phases of the REDD+ program.
89	P3: Change the term 'poverty alleviation'. The term 'poverty' should not be included, because there is no definition of this term. Therefore it's very subjective to alleviate poverty via a REDD+ program. The meaning of the Principle 'alleviation of poverty' could have many interpretations. The suggestion is to	18	'Sustainable livelihoods and poverty alleviation' has been replaced with 'long-term livelihood security and enhancing well-being'.

⁸ All analysis of costs, benefits and risks should include those that are direct and indirect and include social, cultural and economic aspects. Costs should include opportunity costs. All costs, benefits and risks should be compared against the reference scenario which is the most likely land-use scenario in the absence of the REDD+ program.

⁹ 'Relevant rights holder and stakeholder groups' are identified in accordance with criterion 6.1.

¹⁰ At local, national and other relevant levels.

¹¹ Recognizing that any mitigation measures within the REDD+ program should be developed and implemented with full and effective participation of all relevant stakeholders and rights holders in accordance with criterion 6.2

	put 'improve livelihoods (condiciones de vida) or improve people's quality of life rather than livelihoods.			
90		<p>3.1.2 3.1.2 The most vulnerable groups are identified among the forest-dependent peoples.</p> <p>3.1.3 Communities of the forest-dependent peoples, including the most vulnerable groups, acknowledge that they have received benefits from participation in the REDD+ program.</p> <p>3.1.4 The REDD+ program generates increased resources to contribute to sustainable livelihoods and poverty alleviation.</p>	18	<p>The following changes have been made:</p> <p>3.1.2 The most vulnerable people are identified among the Indigenous Peoples and local communities participating in the REDD+ program.</p> <p>3.1.3 Indigenous Peoples and local communities including the most vulnerable people, acknowledge that they have received benefits from participation in the REDD+ program.</p> <p>3.1.4 The REDD+ program generates increased resources¹² to contribute to long-term livelihood security and enhancing the well-being of Indigenous Peoples and local communities.</p>
91		<p>3.2.1 The REDD+ program adopts a transparent process that requires that forest-dependent peoples to define the form that the benefits will take and how they are delivered and how they will be used to improve their livelihoods.</p>	18	<p>The following changes have been made</p> <p>3.2.1 The REDD+ program adopts a transparent process that requires that Indigenous Peoples and local communities, including the most vulnerable people among them, define the form that the benefits will take, how they are delivered and how they will be used to improve their long-term livelihood security and well-being.</p>
92		<p>3.3.2 The social impact monitoring identifies positive and negative impacts on the most vulnerable groups.</p>	18	<p>3.3.2 has been changed as follows:</p> <p>3.3.2 The social impact monitoring takes a differentiated approach that can identify positive and negative impacts on the most vulnerable people.</p>

¹² Increased resources should be compared against the reference scenario which is the most likely land-use scenario in the absence of the REDD+ program.

93	3.3 Adaptation based on the assessment. The results of 3.3 are used to adapt the program.		18	This is covered in 3.4
94		3.4.1 Measures are developed and implemented to mitigate potential and actual negative impacts on forest-dependent peoples in general both in the design and implementation phases of the REDD+ program	18	This may also be a translation issue? 'during the design and implementation phases' seems appropriate.

Principle 4

	Comment	Proposed change	By	Response
95	<p>4.1 one of the first tasks of a REDD program when entering indigenous territories is to try to evaluate the governance level of the territory, sometimes there are internal differences, which do not help, you can also observe surveillance problems and problems with the legal control of the forest resources. The managing institution and the indigenous organizations have no control, sometimes there is a lot of illegal logging activity going on and to improve governance we should encourage awareness, information about the existing legal regulations in terms of the natural and forest resources.</p> <p>In order to promote Sustainable Development the local and government organizations should strengthen institutional capacities (operational and administrative structures, equipment, and training).</p>		2	<p>4.2.2 has been modified as follows: 4.2.2 The REDD+ program includes institutional capacity strengthening and other measures that aim to improve these governance aspects.</p>
96	<p>current 4.3.1 REDD+ program institutional arrangements reflect government leadership. 4.3.2 Government agencies/organizations play a leading role in the development, implementation and evaluation of the REDD+ program. comment: What will happen if the government is not very enthusiastic about REDD+, although is not opposed? Organizations promoting REDD+ projects will be left out? only REDD or REDD- projects will be feasible in that country?</p>		3	<p>These standards apply to government-led programs so by definition will require government leadership and support for REDD+ action. These standards are not relevant for projects that are implemented outside a government-led program.</p>
97	<p>4.3 I think there is too much emphasis on a state which always has to participate. If this can be achieved it is good, but if not, a permanent information of state agencies should be enough. Therefore, I suggest to alter the sentence in</p>	<p>4.3. as follows “There is government involvement in the REDD+ program in their country.”</p> <p>4.3.1. should be altered to “REDD+ program institutional arrangements reflect government participation.”</p> <p>4.3.2 should be altered to “Government agencies/organizations are continuously informed or</p>	5	<p>These standards apply to government-led programs so by definition will require government leadership and effective coordination in support of REDD+ action. The proposed changes would not be consistent with this requirement for government leadership and coordination.</p>

		<p>even participate actively in the development, implementation and evaluation of the REDD+ program.</p> <p>4.4 should be altered to “There is effective coordination between government agencies / organizations and the responsible for the design, implementation and evaluation of the REDD+ program.”</p> <p>4.5 should be altered to “The REDD+ program contributes to sector-wide improvements in forest governance.”</p>		
98		4.4.1 An effective and efficient process is established to link the REDD+ program with all relevant ministries and government agencies/organizations at all levels.	6	4.5.1 has been modified as follows: 4.5.1 An effective and efficient process is established to link the REDD+ program with all relevant ministries and government agencies/organizations at all relevant levels.
99	4.3 How can we ensure the ownership feeling of rights holders?		6	Full and effective participation of rights holders and stakeholders is addressed in principle 6.
100		<p>4.1 The REDD+ program is coherent with national sustainable development policies. Plans and strategies and those at other relevant levels.</p> <p>4.1.2 The REDD+ program policies and strategies elaborate how the REDD+ program will contribute to the implementation of any existing poverty reduction strategy developed at national or other relevant levels of government and communities.</p> <p>4.1.5 The REDD+ program policies and strategies elaborate how the REDD+ program will contribute to the implementation of any existing biodiversity strategy developed at national, sub-</p>	6	<p>4.1 has been modified as follows:</p> <p>4.1 The REDD+ program contributes to achieving the objectives of sustainable development policies, plans and strategies¹³ established at national and other relevant levels.</p> <p>The contribution of the REDD+ program to community sustainable development plans is addressed in principle 3. This principle focuses on government policies, plans and strategies.</p>

¹³ e.g. poverty reduction strategies/targets, national budgets, national biodiversity strategies, national climate change strategies, national adaptation plans etc.

		<p>national and community level or for relevant ecological regions.</p> <p>4.1.6 The REDD+ program is supported by the broader policy framework for forestry, land-use, community development and other relevant sectors.</p> <p>(new indicator) 4.1.7 The REDD+ program policies and strategies contribute to implement the community development programs of forest-dependent local communities</p>		
101	<p>4.1 Comments: The REDD+ program should not only be coherent with national sustainable development policies and strategies, it should also be coherent and not undermine the economic, social, and cultural development priorities of the indigenous people and local communities, ensuring at all times the respect for their collective rights, notably in terms of the land and territories whose title in legal terms should be safeguarded.</p>	<p>Suggested amendment: 4.1 The REDD+ program is coherent with national sustainable development policies and strategies and those at other relevant levels, respecting the development plans and priorities identified by the indigenous peoples and local communities as legal persons with collective rights.</p>	9	<p>The contribution of the REDD+ program to community sustainable development plans is addressed in principle 3. This principle focuses on government policies, plans and strategies.</p>
102	<p>4.3.2 Comments: We should take into consideration that the leading role at the local level and at all stages of the process, corresponds to the legal persons, in this case the indigenous peoples and local communities.</p>	<p>Suggested amendment: 4.3.2 Government agencies/organizations and organization and representatives of the indigenous people and local communities as legal persons with collective rights, play a leading role in the development, implementation and evaluation of the REDD+ program.</p>	9	<p>The full and effective participation of rights holders and stakeholders is addressed in principle 6.</p>
103	<p>4.4 Comments: We must take into consideration that the leading role at the local level and at all stages of the process, corresponds to the legal persons, in this case the indigenous peoples and local communities.</p>	<p>Suggested amendment: 4.4 There is effective coordination between government agencies/organizations responsible for the design, implementation and evaluation of the REDD+ program and other relevant government agencies/organizations and the full and effective participation of the representatives of the indigenous peoples and local communities is ensured at all stages of the process.</p>	9	<p>The full and effective participation of rights holders and stakeholders is addressed in principle 6.</p>

104		4.1.4 The REDD+ program is supported by the broader policy framework for forests and water resources and other relevant sectors .	10	REDD is principally concerned with forest management and other sectors like water resources are included in ‘other relevant sectors’.
105		4.3.3 New Indicator Government allocates sufficient funds to implement REDD+ program	10	It would be too difficult to verify whether ‘sufficient resources’ had been allocated, and resources could always be insufficient. It was therefore decided not to include this indicator.
106	4.4.1 Comment: –What makes a process efficient or effective?		10	Efficient has been defined in a footnote as follows: ‘Efficient’ is defined as achieving the target with minimum cost, effort and time. Effective is defined as The ‘effectiveness’ of the REDD+ program is defined as the extent to which the emissions reductions and other goals of the program are achieved.
107	Another order item. Seems that it would make sense to have 4.3 first than, 4.1, 4.4, 4.5 and then 4.2 in terms of flow and logic.		11	These have been re-ordered.
108	P4 Clearly meeting many of the indicators included within this section (and some subsequently), such as those concerning broader government policy frameworks for example, are not necessarily within the ‘sphere of influence’ of non-government organisations (including NGOs, companies etc.). It may be important to specifically recognise this. The implication is that this framework, although providing useful guidance to initiatives taking place outside the formal national government/REDD+ process, might be impossible to deliver on in its entirety. What might be the status of such [non-government] initiatives which deliver on aspects within their control? 4.1.4 Worth listing some major examples of ‘broader policy framework’, i.e. CBD, UN Declaration on the Rights of Indigenous and Local Peoples, work of the		13	These standards apply to government-led programs so by definition will require government leadership and support for REDD+ action. These standards are not relevant for NGO initiatives or projects that are implemented outside a government-led program. 4.1.4 these frameworks are international and not national strategies and plans.

	UN Forum on Forests, Agenda 21 process??? – or is this covered enough by 8.1??			
109	4.2 if criterion 8.1 and 8.2 determinates to have a coherence between the REDD program and laws, therefore it seems inappropriate to have a process to sort out inconsistencies between REDD program and laws.		17	Principle 8 relates to coherence with laws whereas criterion 4.2 relates to inconsistencies between the REDD+ program and policies, plans and strategies.
110	4.4 could be an indicator of criterion 4.5		17	Effective coordination between government agencies goes beyond the contribution of the REDD+ program to sector-wide improvements in forest governance.
111		4.1.4 The REDD+ program is inserted into the broader policy framework for forests and other relevant sectors.	18	Changes made as follows: 4.4.2 The REDD+ program is integrated into the broader policy framework of the forest sector and other relevant sectors.
112		New Indicator 4.2.3 The process for resolving the inconsistencies is implemented.	18	4.4.4 has been modified as follows: 4.4.4 A review process and timeline for resolving the inconsistencies between the REDD+ program and other relevant sustainable development policies, plans and strategies is established and implemented .
113	4.4 and 4.4.1 remove ‘government’ to keep this at a general level	4.4 There is effective coordination between agencies/organizations responsible for the design, implementation and evaluation of the REDD+ program and other relevant government agencies/organizations.	19	It is important that there is government leadership so 4.4 has been modified as follows: 4.4 There is effective coordination between government and other agencies/organizations responsible for the design, implementation and evaluation of the REDD+ program and other relevant government agencies/organizations.
114		4.5 The REDD+ program leads to sector-wide improvements in socio-environmental governance 4.5.3 The REDD+ program monitoring and evaluation plan includes key social and environmental governance indicators	19	REDD is principally linked with forest sector management so it does seem important that REDD+ program contributes to sector-wide improvements in forest governance. Forest governance indicators will include social and environmental governance indicators.

115	Justification: It's important that a sense of commitment is generated among the participants in the REDD+ program .	<p>New criterion 4.6 There is a strong sense of ownership of the REDD+ program by the beneficiaries.</p> <p>New indicator 4.6.1 The beneficiaries of the REDD+ program play a leadership role in the development, implementation and evaluation of the REDD+ program.</p>	19	The full and effective participation of rights holders and stakeholders is addressed in principle 6.
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Principle 5

	Comment	Proposed change	By	Response
116	5.1 it should include not only biodiversity values and ecosystem services, it should to the extent possible include an environmental assessment to determine the estimated value of the environmental conditions.		2	Environmental assessment is required under 5.2
117	Need to specify the meaning of 'values'		8	The term 'values' is no longer used in the criteria and where the term is used in the indicators it is defined as follows: Including biodiversity and ecosystem service values identified in existing national biodiversity strategy and action plans (NBSAP), gap analyses supporting the Convention on Biological Diversity 2010 targets or application of frameworks aligned with these efforts such as multilateral development bank safeguards (World Bank OP 4.04, IFC Performance Standard 6), key biodiversity areas, high conservation value areas and other relevant systematic conservation planning approaches.
118		5.2 and 5.3.2 use the word 'adverse impacts' rather than 'negative impacts'	6	The term 'negative' impacts is widely used and seems appropriate in these standards.
119	Comments: The process of maintaining and enhancing biodiversity and ecosystem services should respect the traditional systems of land and territory management of the indigenous peoples and local communities: sacred sites, food, medicines, without undermining their right to access to traditional	Suggested amendment: 5. Biodiversity and ecosystem services are maintained and enhanced, respecting the traditional management systems, access to livelihood sources and the right to self determination in the land and territories of the indigenous peoples and local communities.	9	Criterion 5.1 addresses the impacts of the REDD+ program and includes ensuring that the values of biodiversity and ecosystem services to indigenous peoples and local communities either for their use or cultural and spiritual values and maintained and enhanced. Criterion 5.3

	livelihoods and to self-determination.			addresses the design of the REDD+ program and ensures that the design building on relevant traditional knowledge and management practices of forest-dependent peoples and other stakeholders.
120		5.1.3 The REDD+ program identified and implemented measures that aim to maintain and enhance the identified biodiversity, ecosystem service values.	10	5.1.2 has been modified as follows: 5.1.2 The REDD+ program identifies and implements measures that aim to maintain and enhance the identified biodiversity and ecosystem service values.
121	<p>P5 and 5.1.4 Might this include addressing any conflicts between local livelihoods and biodiversity? For example, what if local communities involved in (unsustainable) parrot trapping or bushmeat harvesting etc. – which might have minimal long-term impact on forest structure and carbon? Might it be appropriate to consider including an indicator which addresses this wider attention to biodiversity values? Need a definition of sustainable forest management/sustainable management of forests just in case legal text fails to provide one??</p> <p>Include an indicator that distinguishes between natural forests and industrial forests and plantations</p> <p>Include an indicator that explicitly recognises the climate change adaptation benefits of a REDD+ programme that makes a significant contribution to maintaining and enhancing biodiversity and ecosystem services – improving ecosystem resilience to climate change: - improves biodiversity and in turn improves livelihood options in terms of non-timber forest products, soil fertility, etc. in the face of uncertain climate - maintaining forests around the watershed source prevents mudslides</p>	<p>Maybe include in 5.2.2 (recognition of impacts) – climate change impacts?? Important to integrate mitigation methods (predominately what REDD is) with adaptation where possible</p> <p>5.1.2 – add ‘of high conservation value’ (+definition?) to list of ‘including but not limited to...’</p> <p>5.3.2 In addition: Measures are developed and implemented with recognition of decisions from the CBD</p>	13	<p>The term ‘high conservation value’ is not used in the standards except as an example of biodiversity and ecosystem value assessments to enable countries to use this approach if relevant or to use other approaches Including those identified in existing national biodiversity strategy and action plans (NBSAP), gap analyses supporting the Convention on Biological Diversity 2010 targets or application of frameworks aligned with these efforts such as multilateral development bank safeguards (World Bank OP 4.04, IFC Performance Standard 6), key biodiversity areas, high conservation value areas and other relevant systematic conservation planning approaches.</p> <p>There is no appropriate place for definition of sustainable management of forests which is not a term used in these standards.</p> <p>A footnote has been added as follows: Paying specific attention to any plans to expand non-native forests and their impacts on biodiversity and ecosystem service values.</p> <p>The reference to contributing to obligations under CBD (and potentially other treaties and conventions) is more relevant under Principle 4</p>

	- etc.			<p>– where contribution to national biodiversity strategies is required.</p> <p>Climate change adaptation benefits have been added to the list of potential biodiversity and ecosystem service values in 5.1.2</p>
122	Analyzing the international criteria 5.1 (Biodiversity and ecosystem service values are maintained and enhanced) and 5.3 (The REDD+ program design addresses maintenance and enhancement of biodiversity and ecosystem service values), there is no much difference between the two criteria. This is strengthened at indicators level, where it is noticed overlaps between indicators 5.1.3 and 5.3.1 and 5.1.4 could be more appropriate under criterion 5.3. Therefore, it is suggested to revise both criteria in order to end up with a single criterion.		17	<p>5.1 is an impact criterion and 5.3 is a process criterion.</p> <p>The requirement to build on trad. knowledge and management practices of IP/LCs is important so has become part of the criterion.</p>
123	P5. Reverse the order of the criteria: 5.3, 5.2, 5.1 In order to start with the design phase		19	All other principles start with the impact criteria and move on to the process criteria so the current order is consistent with the rest of the standard.
124	5.1 Create/design a baseline for the parameters of Biodiversity and Ecosystem Services to be measured (maintained and enhanced) = Proxies. 5.2.1 Use the baseline defined in 5.1 for monitoring.	Specify the meaning of ‘values’ (#species, distribution of species, cultural value)	19	<p>Impacts on biodiversity and ecosystem services are relative to the reference scenario which is the most likely land-use scenario in the absence of the REDD+ program.</p> <p>The term ‘values’ is no longer used in the criteria and where the term is used in the indicators it is defined as follows: Including biodiversity and ecosystem service values identified in existing national biodiversity strategy and action plans (NBSAP), gap analyses supporting the Convention on Biological Diversity 2010 targets or application of frameworks aligned with these efforts such as multilateral development bank safeguards (World Bank OP 4.04, IFC Performance Standard 6), key biodiversity areas, high conservation value areas and other relevant</p>

				systematic conservation planning approaches.
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Principle 6

	Comment	Proposed change	By	Response
125	6.2 There are cases, such as the Indigenous Congresses, where consultations are carried out through their own indigenous government structures, they have their own methodology		2	Criterion 6.3 has been modified as follows: 6.3 Rights holder and stakeholder groups determine, in a verifiable manner, the process by which they will be consulted and represented, taking account of statutory and customary institutions.
126	6.2.3 the consultations with indigenous peoples should not only be culturally appropriate, such consultations should be relevant by virtue of their government structures and the strategies should be endorsed or approved by the majority of the people in the community.		2	See new formulation for 6.3.1 and indicators
127	current 6.1.1 Stakeholder groups are identified including Indigenous Peoples, local communities, women and other potentially marginalized groups. 6.1.2 The rights and interests of each stakeholder group in relation to the REDD+ program are characterized including potential barriers to their participation. comment: to include ALL stakeholders can be an endless task, as more and more stakeholders can emerge. There is a need to have a finite set of stakeholders, but this must not mean that any interested party can be considered.	can be 6.1.1 RELEVANT Stakeholder groups are identified including Indigenous Peoples, local communities, women and other potentially marginalized groups. 6.1.2 The rights and interests of each RELEVANT stakeholder group in relation to the REDD+ program are characterized including potential barriers to their participation. 6.1.3 THERE IS A MECHANISM TO ALLOW THAT ANY INTERESTED PARTY CAN APPLY AND BE CONSIDERED AS RELEVANT STAKEHOLDER GROUP, IF IT REASONABLY SHOWS TO HAVE A REAL STAKE REGARDING THE REDD+ PROJECT.	3	Modifications have been made as follows: 6.1.1 Rights holder and stakeholder groups are identified including Indigenous Peoples, local communities, with special attention to the most vulnerable groups. ¹⁴ 6.1.2 The rights and interests of each rights holder and stakeholder group in relation to the REDD+ program are characterized, including potential barriers to their participation, and their relevance to the REDD+ program defined. 6.1.3 There is a procedure to enable any interested party to apply be considered as a relevant rights holder or stakeholder based

¹⁴ 'The most vulnerable groups' are those with least secure access to the assets on which secure livelihoods are built (social, cultural, human, financial, natural physical and political) and/or high exposure to external stresses and shocks, including climate change, that may affect these assets and peoples' ability to use these assets. This category specifically includes groups that are disadvantaged by gender, ethnicity, socio-economic status etc.

				on their rights and interests related to REDD+ program.
128		6.6. and 6.6.1 add 'preparation' to make 'planning, preparation and implementation'	6	Preparation is part of planning. The use of 'planning, implementation and evaluation' seems sufficient.
129		6.2. and 6.2.3 add 'public hearing' to make 'public hearing and consultation'	6	'Public hearing' is a potential part of the consultation process to be determined by relevant rights holder and stakeholder groups. It does not seem relevant to include this level of detail in the international standards but could be relevant for country-specific interpretation.
130		6.2.2 There is effective representation of women, poor , youth and other potentially marginalized groups identified in 6.1 in the stakeholder consultation and participation process.	6	The term 'the most vulnerable' includes the poor and has been used throughout the standards.
		6.1 and 6.1.1 Stakeholder groups are identified including Indigenous Peoples, local communities, women, forest-dependent poor and other potentially marginalized groups.	6.	The term 'the most vulnerable' includes the poor and has been used throughout the standards.
131		P6 and 6.1 put rights holders before stakeholders	6	This change as been made throughout the standards.
132	6.1.2 Comments: In addition to the characterization of the rights and interests of each stakeholder group, their inclusion and respect in the REDD+ program should be ensured.	Suggested amendment: 6.1.2 The rights and interests of each stakeholder group in relation to the REDD+ program are characterized and incorporated, including any potential barriers to their participation.	9	Respect for the rights of each rights holder group to lands, territories and resources is required by principle 1 and respect for their right to full and effective participation is required by principle 6. This indicator is specifically related to identifying the relevant rights and other indicators are concerned with respecting those rights.
133	6.4 Comments: There must be a clear differentiation between the representatives of the stakeholder groups on the one hand, and the representatives of the legal persons, on the other. The latter, apart from helping to build consensus, should be ensured the right of the people they represent (indigenous peoples and local communities) to veto the REDD+ initiatives or	Suggested amendment: 6.4 Stakeholder group representatives and representatives of the legal persons with collective rights as indigenous peoples and local communities, ensure effective involvement of and accountability to the people they represent and assist with consensus building, and may also exercise their right to veto when it is considered that the	9	There is now clear differentiation between the representatives of rights holder and stakeholder groups. The full and effective participation of rights holders in design, implementation and evaluation in accordance with criterion 6.2 and the stipulation that participation is voluntary, should ensure that activities are only

	projects if they believe that they threaten their collective rights, lifestyles and livelihoods.	REDD+ program threatens their collective rights, lifestyles and livelihoods.		implemented that receive their approval.
134	6.5 Comments: The REDD+ program should not only worry about the understanding of the program itself, but also about the incorporation of a framework that guarantees the respect for the collective rights and development priorities of the indigenous peoples and local communities	Suggested amendment: 6.5 The stakeholders and legal persons fully and effectively participate in the process, have a good understanding of the key issues related to the REDD+ program and their proposals are incorporated.	9	The incorporation of proposals from rights holders and stakeholders is required by criterion 6.2 in accordance with the following definition of 'effective participation': 'Effective participation' means meaningful influence of all relevant rights holders and stakeholders who want to be involved, ensuring they have prior access to adequate information.
135	6.6 Comments: The REDD+ program should not only receive and resolve grievances and disputes it should also consider sanctions against the breach of the conditions related to the respect of both statutory and customary rights of the indigenous peoples and local communities.	Suggested amendment: 6.6 Mechanisms are in place to receive and resolve grievances and disputes relating to planning and implementation of the REDD+ program, and the violations of the customary and statutory collective rights of the indigenous people and local communities are sanctioned.	9	Respect for the rights of each rights holder group to lands, territories and resources is required by principle 1 and respect for their right to full and effective participation is required by principle 6. Grievances and disputes could be related to violations of rights or other types of grievance and it does not seem appropriate to give examples of all types of possible grievances.
136		Stakeholder groups are identified including Indigenous Peoples, local communities, women and other potentially marginalized and vulnerable groups.	10	The term 'the most vulnerable' has been used instead of 'marginalized'.
137	6.5.1 COMMENT: distinguish between quantitative and qualitative indicators i.e. awareness raising activities can be quantified in terms of perception surveys but not reflective as indicators		10	Many of the indicators in these standards are qualitative rather than quantitative and can still be effective indicators of whether the criterion is achieved.
138	6.7.2 COMMENT: add another criteria for capacity-building for stakeholders			Criterion 6.5 has been modified to include capacity-building.
139		New Criterion 6.8 Relevant stakeholders have the capacity to implement and monitor REDD+ programs. New Indicator 6.8.1 Relevant stakeholders have the capacity to implement and monitor REDD+ programs.	10	Criterion 6.5 and indicator 6.5.2 have been modified/added to include capacity-building.
140	How will distant (non-local) stakeholders be addressed? For example urban stakeholders;		13	'Relevant' stakeholders are defined in accordance with criterion 6.1 and could include

	recreational stakeholders; distant (existence value) stakeholders? Is there a need here to define what a 'relevant' stakeholder is? 6.2.4 Appropriate CSOs and NGOs consulted			those who are not local.
141	suggest referring to other populations than those directly involved in REDD+ actions, enlarging the stakeholders' groups to those indirectly impacted by REDD+ actions.		17	'Relevant' stakeholders are defined in accordance with criterion 6.1 and could include those who are indirectly impacted.
142	Criterion 6.7 would be more appropriate and in better context if it is included in principle 3 related to quality of life improvement and poverty alleviation.		17	Building on and supporting traditional knowledge and management systems is an important element of full and effective participation so is appropriate within this principle. Principle 3 and criterion 3.2 require that Indigenous Peoples and local communities determine how the REDD+ program improves their long-term livelihood security and well-being and would necessarily build on and support their traditional knowledge and management systems.
143	6.4.1 and 7.2.1 Stakeholder representatives also need adequate resources for this		17	A new criterion 6.9 has been added to require adequate resources.
144	For both P6+P7 National policies should include capacity building.		19	Capacity building has been included in 6.5
145	P6 Who defines which are the relevant stakeholders?		19	A new indicator has been added: 6.1.3 There is a procedure to enable any interested party to apply be considered as a relevant rights holder or stakeholder based on their rights and interests related to REDD+ program.
146	6.1.1 'Potentially marginalized' is not very clear	We suggest explaining that REDD could marginalize certain groups.	19	The term 'the most vulnerable' has been used instead of 'marginalized'. 'The most vulnerable people' are those with least secure access to the assets on which secure livelihoods are built (social, cultural, human, financial, natural physical and political) and/or high exposure to external stresses and shocks, including climate change, that may affect these

				assets and peoples' ability to use these assets. This category specifically includes individuals or groups that are disadvantaged by gender, ethnicity, socio-economic status etc.
	6.2 Effective participation is required in each of the phases. For the Ecuadorian government, in some cases participation is only included for VALIDATION. Therefore we need the standards to include the participation of stakeholders in all phases.		19	'Full' participation means participation throughout the process. In addition, 6.2 stipulates that participation should be in design, implementation and evaluation.
147	Justification: there are different levels of local government.	6.2.4 The different levels of local government are involved in the REDD+ program and their role is clearly defined.	19	This has been addressed through the addition of 'or other relevant levels' in 6.2.4
148		6.6.1 A transparent, accessible, independent and timely process is established to address grievances and disputes that arise during project planning and implementation including a process for hearing, responding to and resolving stakeholder grievances within a reasonable time period.	19	See new formulation of 6.7.1
149	The participation of these stakeholders (Indigenous peoples and communities) in the evaluation, would be helpful.	6.7 Program planning, implementation and evaluation builds on and supports stakeholders' knowledge, skills and management systems including those of Indigenous Peoples and local communities.	19	See new formulation of 6.6

Principle 7

	Comment	Proposed change	By	Response
150		P7 and 7.1 put rights holders before stakeholders	6	This has been adopted throughout the standards.
151		7.1.3 Stakeholders and rights holders have access to relevant information about the REDD + program including the results of monitoring and evaluation of the REDD+ program, and potential social, cultural, economic and ecological risks and opportunities, legal implications, and the global, national and local context.	6	Adopted in 7.1.3.
152		7.4 National policies support stakeholder access to information about the REDD+ program, including information on rights to land, territories, resources and environment .	6	This criterion has been changed to indicator 7.1.2
153		7.4.2 The right to information policies and/or legislation are enacted and implemented.	6	This criterion has been changed to indicator 7.1.2
154	7.1.4 Comments: The information, beyond the fact that it is provided in a form that is understandable, should be provided in the language of the indigenous people or local community in question and should ensure the right to consultation, to full and effective participation, to free prior and informed consent, as well as the right to veto.	Suggested amendment: 7.1.4 Indigenous Peoples and local communities are ensured the exercise of their collective rights, mainly the right to consultation, to full and effective participation, to free prior and informed consent, and to veto, during all the stages of the project and in their own languages.	9	The rights to full and effective participation of rights holders are covered in Principle 6.
155	7.1 'information that they need' may be too restrictive. In a world of uncertainty where full information is rarely available (and/or very costly) it may be better to refer to 'best available information'? [This is kind of reflected in 7.1.1 but could perhaps be made more explicit].		13	This is reflected in the indicators as follows: 7.2.1 Rights holders and stakeholders know what information is available about the REDD+ program and how to access it. 7.2.2 The most effective means of dissemination of information about the REDD+ program are identified and used for

				<p>each rights holder and stakeholder group.</p> <p>7.2.3 Rights holders and stakeholders have access to relevant information about the REDD+ program including the results of monitoring and evaluation, potential social, cultural, economic and ecological risks and opportunities, legal implications, and the global, national and local context.</p> <p>7.2.4 Indigenous Peoples and local communities have access to relevant information about the REDD+ program in a form they understand.</p>
156	Who establishes the process?	7.2.2 Mechanisms and processes are established which guarantee that stakeholders receive and supply all relevant information related to the REDD+ program through their representatives.	19	Mechanisms is not needed in addition to processes.
157	Faced with a lack of knowledge, this principle runs the risk of not being effectively implemented. Information / Knowledge. We need to convert access to information into knowledge. Better in Spanish to say 'guarantee access to'	<p>7.4 National policies support stakeholder access to information about the REDD+ program, including information on rights to land, territories, resources and environmental services.</p> <p>7.4.1 Policies and/or legislation guarantee access to information about the REDD+ program.</p> <p>7.4.2 The right to access information is implemented.</p> <p>7.4.3 Mechanisms for access to information. are implemented</p>	19	This criterion has been changed to indicator 7.1.2
158		<p>7.5 Stakeholders and rights holders have access to legal (technical and financial) advice and understand relevant legal implications and processes.</p> <p>7.5.1 A legal advice service (technical and financial) defined by the stakeholders and rights holders is available and accessible to stakeholders and rights holders to advise them on the legal and financial implications of the REDD+ program and on</p>	19	<p>This was moved to principle 6 because of its relevance to participation.</p> <p>6.8.1 A legal advice service is available and accessible to stakeholders and rights holders to advise them on the legal and financial implications and on legal processes related to the REDD+ program.</p>

		legal processes.		
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Principle 8

	Comment	Proposed change	By	Response
159	P8. it is not just the REDD program who should comply with the local and national laws and international treaties and agreements.		2	These standards apply to the REDD+ program therefore it is appropriate that the principle refers to legal compliance of the REDD+ program.
160	8.1.3 the local and national laws and international treaties and agreements should not simply be identified, the affected communities should be familiar with them and comply fully with them for the REDD Program.		2	This is covered in 8.3
161	The REDD+ program should be a State program and not a government program. It should not change when a new government comes to power so should be adopted by law.		8	This is an important issue but very demanding to make as a requirement of the standards.
162		Add 'conventions' to international treaties, conventions and agreements in 8.1, 8.1.1, 8.1.3	6	This has been added.
163	<p>8.1.1 International treaties and agreements relevant to the REDD+ program are identified (this is an activity, not an indicator).</p> <p>8.1.2 National and local laws relevant to the REDD+ program are identified (this is an activity, not an indicator).</p> <p>8.1.3 Any possible areas where the REDD+ program does or may not comply with the relevant local and national laws and international treaties and agreements are identified and monitored (this is the only indicator for this criteria).</p>		10	Indicators can be formulated to ensure that important activities have been undertaken. Note that 8.1.3 is also an activity.
164		We believe that there should only be 1 indicator: 8.1.1 and 8.1.2 are not necessary because 8.1.3	19	8.1.3 requires identification of the areas where the REDD+ program does not comply with

		includes the identification of relevant treaties, laws and agreements.		relevant laws etc. not the identification of the relevant laws etc.
165	8.3 This isn't clear enough. For example we think that it may be saying that the State has the capacity for forest control. In this case, it is relevant.			