

November 4, 2011

**Comments from Bank Information Center on Mexico Forests and Climate Change
Project under the FIP Investment Plan**

Dear Patricia and Andrea,

Please find attached comments from the Bank Information Center and letters from Red-MOCAF and SAKBE (Mexican organizations) regarding the SIL Project "Mexico Forest and Climate Change".

We will be very thankful if you kindly forward these documents to the Sub-Committee members and to post it on the website.

Very best,

Paulina

Paulina Garzon
Latin America Program Manager
Bank Information Center

Comments on the SIL Project “Mexico Forests and Climate Change Project”, (P123760 (IBRD) and P124988 (FIP)

Bank Information Center, BIC

November 4, 2011

Attention: Patricia Bliss Guest, the CIF Administrator
Andrea Cutter, the FIP Coordinator

Knowing that the SIL Project “Mexico Forests and Climate Change Project” (supported partially with FIP funding) will be approved today, Friday Nov 4, subject to the absence of objections period, and taking into account that the Government of Mexico has confirmed its openness to take comments, BIC would like to present observations and to share letters from the Mexican organizations (at their request) Red Mexicana de Organizaciones Campesinas Forestales (Red MOCAF), and SAKBE, Comunicacion y Defensa to Sergio Madrid (President of the CTC and to Sergio Graf (Technical Secretary of the CTC) regarding the consultation process of this project.

1. Whether the SIL Project “Mexico Forests and Climate Change Project” (P123760 (IBRD) and P124988 (FIP) fits into the SESA process or vice-versa

Several components of the SIL Project overlap with components of the SESA process. There is no information about how these activities and outcomes will fit into the SESA process or vice-versa. It is worrying that these SIL Project activities will be conducted without the framework provided by SESA, especially regarding participation and the World Bank safeguard criterion.

Examples of overlapping activities between SIL Project “Mexico Forests and Climate Change Project” and areas that should be part of the SESA process:

Subcomponent 1.1. Monitoring and Evaluation. (IBRD US\$5m, and FIP US\$2m grant) “... this subcomponent would help CONAFOR design and pilot a comprehensive REDD+ MRV system. It would help develop tools to monitor the environmental and social impacts of REDD+ pilot projects in the Early Action areas, and explore community-based monitoring techniques”

Subcomponent 1.2. Policy Design, Participatory Processes, and Knowledge Sharing. (IBRD US\$12.5m and FIP US\$5m grant). “...This subcomponent will support analytical works and participatory processes aimed at improving public policies and programs...” This subcomponent would be coordinated with the REDD+ Readiness process supported by the FCPF”

Subcomponent 1.3. Strengthening of CONAFOR and Cross-Sector Coordination. (IBRD US\$12.5m and FIP US\$1.66m grant) “...this subcomponent would foster cross-sector coordination between CONAFOR and other federal agencies involved in rural development (SEMARNAT, SAGARPA, CONANP, and PROFEPA)...”

Subcomponent 3.1. Policy Innovation and Cross-Sector Harmonization (For information, costs covered under Component 1.2). “This subcomponent would support the analytical work and participatory processes needed to design innovative REDD+ approaches that will be piloted under subcomponents 3.2 and 3.3.”

Subcomponent 3.2. Building Capacities for Landscape-Based Management in REDD+ Early Action Areas. (FIP US\$7m grant). “...Working through LDAs and LTAs would help mainstream REDD+ into regional development initiatives and in more spatially-integrated landscape management models. LDAs and LTAs would work with communities and help establish local territorial development plans”

Subcomponent 3.3. Community Investments in REDD+ Early Action areas. (FIP US\$7m grant and US\$16.34m loan). “... This subcomponent would use new *lineamientos especiales* and integrated packages of CONAFOR and SAGARPA incentives to support innovative rural landscape management initiatives.”

2. CONAFOR have announced that the consultation process for the ENAREDD+ will start in 2012. However, several documents closely related to REDD+ National Strategy have been consulted already. Several Mexican organizations have expressed their serious concern about the quality of these consultations activities. In this light, BIC would like to make the following recommendations:

- CONAFOR produces a “**REDD+ Year Road Map**” type of document that provides, as complete as possible, information on documents, projects and other initiatives that are part of the building process of ENAREDD+. This document should be updated as needed.
- CONAFOR plans consultation processes making sure that participants have access to relevant information in a complete manner and with enough time to prepare for the consultation meetings . As part of this planning effort, CONAFOR should develop and disclosure a **Consultation Calendar** every six months.
- CONAFOR prepares and disclosures a **Consultation Protocol** under the guidelines established on the the R-PP consultation sections; Common Approach; UN-REDD Program, FCPF and FIP guidelines applicable to effective stakeholder engagement; as well as the Mexican law and international treaties signed by Mexico regarding information, consultation and participation rights.

3. Concerns from RED-MOCAF and SAKBE regarding the SIL consultation process vs. validation, and the congruence with the development of the National REDD Strategy . Please see letters with proposals related to the SIL Project (attached).

Dear Members of the CTC
Sergio Madrid, President of the CTC
Sergio Graf, Technical Secretary of the CTC

In relation to the support that has been requested from the members of CTC REDD+ for the review of 5 documents related to the specific investment loan SIL, I would like to comment, in a constructive spirit, on certain aspects that worry me and then propose some suggestions, which I put forth for consideration by all members of this Committee.

The current period of the year is for many, perhaps the majority, one of intense workloads. Similarly, our organization, despite our interest in the topic, finds it very challenging to invest the coming week in reviewing ENA-REDD+ and the 5 SIL documents, attend the two workshops which we have been invited to, and above that, tend to the responsibilities of our regular work.

It is not clear to me why the deadline is the 10th of November, but I suppose that the reason is related to the discussion and approval of the federal budget and authorization of a counterpart for SIL by the Mexican government. Regardless, I would call it a paradox that the principal and guiding document of the REDD+ process, the REDD+ National Strategy or ENA-REDD+, is at the phase of “draft zero” whereas components such as the SIL are advancing at a very high level of specificity and their direction might not correspond with the final contents of ENAREDD+.

Considering the above, allow me to make the following proposals:

First. For those who can provide opinions of the 5 SIL documents, that they go ahead and that CONAFOR attends to these observations, but that the invitation to review the documents is not taken as a validation on the part of CTC REDD+ for the arguments described previously.

Second. The CTC can endorse or give a vote of confidence for the Mexican government regarding the SIL documents, for the purpose to the end of budget management; however the right of civil society to provide opinions on these documents under appropriate conditions of time and form should be reserved. This adequate time would be having ENA-REDD+ as an official document, probably during the first or second trimester of 2012.

In this sense, ***the contract, agreement or document for the formalization of the SIL should include a clause or provision specifying that once the approval process of ENA-REDD+ has concluded, an analysis for coherence and consistency will be conducted to align the direction of SIL with the content of ENAREDD+. This principle should be applied to all agreements and commitments of the Mexican government with relation to REDD+, since they should all ideally be coherent and consistent with ENAREDD+.***

Third. The priority of analysis and opinion of the CTC should be around the review of the ENAREDD+ since in theory “draft one”, which will be generated after contributions

from CTC REDD+ to “draft zero”, will be the foundational document on which to base a wide process of consultations with the population in general, particularly the rural and indigenous populations, and the document that results from this broad validation process should be the guiding axis for all agreements on REDD+ that had been made earlier and that would be made later.

With regards,

Gustavo Sánchez

p.s. I have heard excellent comments on the participation of CONAFOR in the FIP Sub-Committee meeting last Monday in Washington, DC, particularly the presentation of José Carlos Fernández. Congratulations.

4 November 2011

Dear Sergio Madrid and Sergio Graff,

Considering the importance of reviewing the following 5 documents in defining the safeguards and operation of the SESA process, I would like to take this opportunity to remark as SAKBE that we find the proposed timeframe for their review— before the 10th of November— inappropriate:

- Social Assessment Report
- Environmental Assessment Report
- Draft of Planning Framework for Indigenous Peoples
- Draft of Procedure Framework
- Draft of Environmental Management Framework

Especially since the Version Zero of the ENA-REDD is in its comment process till the 11th of November, it is highly unlikely that members of the CTC will be able to review and send comments within this limited timeframe.

In order that the REDD+ process be truly participative, and that the CTC is not a space for validation, we ask for a time extension. One proposal is to consider the review of one document per week, once comments for Version Cero of ENA-REDD have been sent, which is to say, beginning the week of the 14th of November and ending the week of the 12th of December. Another is to open it up to members of the CTC to propose a timeline for the review.

We look forward to your response, with regards,

Claudia Gómez-Portugal M.

SAKBE Comunicación y Defensa

Directora | Comunicación para el Cambio

Tel. (5255) 5264 3777 |

www.sakbe.org.mx

impulsando el cambio con justicia y equidad

(Translated by the Bank Information Center)