

CLIMATE INVESTMENT FUNDS

May 27, 2015

**APPROVAL BY MAIL: CONGO DR: FOREST DEPENDENT COMMUNITY SUPPORT PROGRAM
(FIP)(DGM)(IBRD)**

Comments received from the United Kingdom

Dear Mafalda

Thank you for providing the UK with the opportunity to comment on the DRC DGM project proposal, and for the additional time allocated to do so.

The overall objectives are good and will provide much needed support to IPs and forest communities in DRC. The project is well aligned to FIP priority areas and builds on previous work and reflection (e.g IP strategies in some territories) .

Our comments mainly relate to project delivery/governance and capacity

- 1) Whilst we recognise that given low capacity amongst IPLCs organisations to manage finance, micro-projects will be appropriate, but how will long term impact be assured through multiple (60) projects, particularly if scattered across a wide area? The project funds for the creation of the community managed protected areas seems to be quite low, especially in comparison to other budget lines (i.e. component 3), and therefore risks not achieving the intended objectives.
- 2) IPLCs organisations are expected to submit projects in partnership with local NGOs. Little detail is provided on these local NGOs, and their capacity and legitimacy to support.
- 3) The National Steering Committee is quite large (24 plus observers) but given the diverse nature of IPLCs, 24 members of the NSC may well be necessary to ensure representation. However, 8 of these members are from just one organisation (REPALEF). Could this be explained further?
- 4) Will non IP local communities be adequately represented? How will the project address the needs of and dynamics with neighbouring Bantu (LC) communities in the project areas as they often share and use the same forests with IPs?
- 5) The value of funds flowing to actual projects on the ground is relatively small: 2.1million split across the 60 micro-projects. The proportion going to the NEA for coordination seems high in comparison at \$1 million, even considering high transaction costs.
- 6) The NEA is supposed to ensure that all activities comply with Bank procedures. Are WB procedures appropriate for micro-projects – and does the NEA have experience in this type of project for the World Bank? Managing 60 micro-projects to meet WB standards could potentially be a challenge unless procedures are simplified.
- 7) A lot of detail on governance and procedures is still to be determined in the Project Implementation Manual (PIM). For example, how will decisions be taken on which projects to finance? Are certain types of project ruled out? How will the risk of competing interests between group representatives or self-interest be handled, and how will the influence of group composition on project selection be addressed?
- 8) What quality assurance mechanisms are in place to ensure that the PIM is fit for purpose?
- 9) How will the project link into wider national level policy processes (i.e. the proposed IP law, community forests, zoning and land reform etc.).

10) Further information on how “satisfaction” will be determined and used as an indicator of project success.

We’d be happy to have a call to clarify any points, and to speed up the process if that would be helpful

Many thanks

Gaia

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