



October 5 2015,

Re: Comments of the civil society on Cameroon ER-PIN

Dear Carbon Fund Participants, Carbon Fund 13th Meeting, Brussels 13-16 October 2015

We, the undersigned organizations, would like to express our concerns regarding the Cameroon ER-PIN, detailed as follows.

Generally, Cameroon's ER-P seems to be very ambitious, not only in terms of the geographical scale (three different regions and seven departments) but also in terms of the level of emissions to be reduced and/or conserved. Without any presumption about the capacity of the Cameroonian government to effectively reduce this by 6 millions of tons of carbon within a very short timeframe, some concerns can, however, be raised about its feasibility in a context of growing resource extraction projects and infrastructure developments that are currently being developed within and around the intended ER-P area; and in a context where there is little progress being made on readiness and where the forest sector faces important problems (for example, illegal logging, lack of transparency, shrinking space for civil society participation).

The ER-PIN has little genuine or in-depth consideration or inclusion of human rights or community rights issues. The entire document is lacking in evidence - both in terms of the key drivers of deforestation (which begs the question of how and why the proposed focus on GHG reductions could properly be developed); and in terms of the proposals apparently aimed at mitigating the negative impact on the livelihoods of affected communities. The focus on GHG reductions, and the fact that these have been developed before a proper assessment of the drivers of deforestation has even been completed, suggests that this is not so much evidence-based but a short-term political compromise allowing the government's to convert forest areas for large-scale projects while at the same time accessing REDD money. As a result, the proposal focuses largely on reducing the (probably much smaller) emissions caused by community agricultural activities. This will have significant implications for the livelihoods and human rights of local communities and indigenous peoples, while significantly limiting the potential for emissions reductions.

This will inevitably make it far less likely that the ER-P will succeed in reducing deforestation. Poor communities will not simply starve in order to abide by rules agreed between the government and conservation organisations; a programme which does not genuinely incorporate their rights and interests will see high levels of non-compliance (and therefore continuing deforestation and GHG emissions), most likely accompanied by significant levels of serious human rights violations (including violence by ecoguards, for example, something which is already a significant problem in Cameroon)

The ER-PIN appears to make some massive assumptions about the ability of new agricultural techniques to replace those which are deeply embedded in the livelihoods and cultures of many hundreds of thousands of rural people in southern Cameroon. It fails to recognise that there have been no demonstrated successes of such agricultural intensification programmes in lowland Cameroon, or indeed anywhere else in the Congo Basin. It fails to consider that the carbon flows of such intensive agricultural systems may be worse than traditional slash-and-burn farming, especially if they rely on imported agro-chemical inputs.

Lack of participation, consultation and FPIC

- Cameroon has developed its ER-PIN without complying with its own national REDD+ FPIC Principles, adopted in 2013, which lays out the framework for engaging local communities and indigenous peoples in REDD+. This raises serious questions about how participatory the ER-PIN development process has been, since the guideline requires the full and effective participation and consultation of local communities and indigenous peoples prior to any REDD+ intervention.
- The ER-PIN claims that “ *the first draft of the ER-PIN was shared with stakeholders prior to the organization of consultation workshop involving all stakeholders in the ER Program area*”. However, the fact that important key CSO groups including the Community Forest Platform, had to ask for the ER-PIN document during the drafting process indicates that there has been no political willingness to share the ER-PIN. Instead, during the drafting process, the document was ONLY shared amongst the international organizations involved in the development of the ER-PIN. Also, the National REDD Coordination has limited CSO participation to the three coordinating organizations of the national REDD CSO platform, despite interest from other groups, (including the Community Forest Platform, known for its focus on forest governance and rights of forest communities) to participate and contribute.
- However, the ER-PIN mentions that local communities and indigenous peoples were consulted during some workshops (national workshop on MRV held in Douala; the indigenous people workshop on FPIC in Abong Mbang; the indigenous people workshop on REDD+ institutional arrangements in Lomie; civil society regional workshop on REDD+ project initiatives in Garoua and Buea; civil society national workshop on REDD+ negotiations in Yaoundé). The titles of these workshops clearly indicate that they were not organized for the purpose of the ER-PIN development is possible that the ER-PIN was mentioned vaguely during these meetings, but they cannot be considered as genuine consultations on the proposal. . Also, this method of consultation is contrary to the PCI (Principles, Criteria and Indicators) approach required by the national REDD+ FPIC guidelines.
- The ER-PIN indicates that FPIC consultations will be organised “after” the ER-PIN is adopted. A consultation plan is, we understand, presently being developed and will be available prior to the

elaboration of the ER Program (p. 35). However, we believe that this consultation plan will be far too late in the process. We are worried that it will be extremely difficult for civil society and communities to question or challenge the overall approach and the intervention axes defined in the ER-PIN after the ER-PIN is adopted. It is expected that, with these so-called FPIC consultations being organised, the ER-PIN can only be tweaked, and not changed fundamentally. It is likely that communities will interpret this as a top-down approach, instead of the bottom-up approach that should be promoted by REDD+.

The ER-P area: a good example of political incoherence and inconsistency?

- Cameroon illustrates its political commitment to conserve and sustainably manage natural resources through the ER-program by outlining some of the international frameworks and conventions signed by the country. Cameroon's REDD+ readiness engagement is also showcased to prove its commitment to reduce deforestation in the proposed ER-P area.
- However, the way this political commitment is translated on the ground can be called into question, especially with regard to the proposed ER-P area. In reality, this area is a good example of political incoherence and a lack of inter-sectoral coordination that will prove highly problematic in the optimal implementation of an ER-P. A joint report¹ from WWF, CED and RELUFA has detailed emerging and current land use conflicts within the ER-P, including the imposition of six different land-used designations (allocated by six different government ministries) over the same piece of land². This not only undermines any potential REDD+ efforts in the area (which is just one of the designations) but is also tarnishing Cameroon's reputation in the Congo Basin as a leader in terms of biodiversity conservation. Various large-scale REDD+ initiatives³ that have already been initiated within the intended ER-P area have so far not succeeded, mainly due to a lack of inter-ministerial coordination and communication that has resulted in overlapping and conflicting land uses. While the ER-P has clearly identified the issue, it completely fails to address it. Ignoring this fundamental problem greatly jeopardises any potential results in emission reductions from the proposed ER-PIN.

¹ Schwartz, B., Hoyle, D., and Nguiffo, S (2012) Emerging trends in land-use conflicts in Cameroon: Overlapping natural resource permits threaten protected areas and foreign direct investment (2012) RELUFA, WWF and CED. Yaounde, Cameroon

² Schwartz, B., Hoyle, D., and Nguiffo, S (2012) Emerging trends in land-use conflicts in Cameroon: Overlapping natural resource permits threaten protected areas and foreign direct investment (2012) RELUFA, WWF and CED. Yaounde, Cameroon

³ The ER-P area comprises an 871,000 hectares forest block, mostly referred as Ngoyla-Mintom. Since the end of the 1990s, this rich-biodiverse forest block was preserved for conservation purposes. A private REDD+ company, Wildlife Work Carbon (WWC) initiated a REDD+ project to protect the pristine tropical forests of the Ngoyla-Mintom forest block. However, in 2012, the Ministry of Forests (MINFOF) unilaterally decided to allocate 81% of the forest block for logging activities without respecting bid procedures for forest concessions allotment as outlined in the 1994 Forest Law. Aware of the embarrassing situation, the Ministry of Environment (MINEPDED) sent a letter to the Prime Minister calling to reconsider MINFOF allocation process given the ongoing WWC REDD+ initiative. The European Union, leading conservation groups such as WWF and local communities also pressured by sending letters to MINFOF with amplifications to the Presidency and Prime Ministry but all these letters did not received the expected result since 49% of Ngoyla-Mintom were finally allotted for logging concessions. There is still ambiguity about the remaining 51% of Ngoyla-Mintom whose utilization would be decided upon at a future date.

Upside-down process - Problem of sequencing and logical order

- It seems entirely inappropriate to have adopted five major intervention strategies without even awaiting the results of the studies on the drivers of deforestation in Cameroon. The criteria according to which they have been selected are not defined, nor are their basis or intention explained in detail. It is therefore difficult to understand if and how the chosen strategies can succeed in reducing deforestation.
- The ER-PIN is being developed in parallel with the national REDD+ strategy, which has been seriously delayed. Essential studies, such as the analysis of the drivers of deforestation, have not been completed. These studies will, it is understood, only be finalized in 2016 and the national REDD+ strategy is expected to be ready by the end of 2016. Therefore, the ER-PIN (which is the basis for the ER-P) is not accurate in stating that “activities in the ER-P are in line with the vision of the REDD+ strategy. The ER-Program will address activities related to reducing emissions and increasing removals”. How can the ER-PIN be in line with a REDD+ strategy that is not yet adopted and available? It seems impossible to state at this stage of the REDD+ process in Cameroon that the five proposed intervention strategies for the ER-P will necessarily fit the future REDD+ strategy.

Inconsistency between identified drivers and REDD+ actions

- Important forest-impacting sectors such as mining, large-scale agriculture and infrastructure development have been well identified as key drivers of deforestation within the intended ER-P area. However, there is very little discussion in the ER-PIN about how these important drivers will actually be addressed. It seems clear that the “low-hanging fruit” strategies identified in the ER-PIN are very unlikely to address large-scale forest conversion projects financed by foreign direct investment, but instead are targeted at restricting small-scale activities that are undertaken by communities.
- Underlying drivers such as incoherent laws on natural resources, and lack of transparency in the granting of concessions that are well known to lead to overlapping and conflicting land uses have been correctly addressed in the ER-PIN, however no credible solutions are being proposed to address this

Too many risks for an ER-Program!

- The risks mentioned in the ER-PIN are enormous and the strategies to avoid these risks are weak (p. 29-30). For example, corruption and lack of political will are rightly recognized as important risks but the ER-PIN fails to explain how to mitigate them in a strategic way. The proposed inclusive and inter-sectoral coordination has so far not worked in the REDD+ process.

Incomplete leakage risk assessment

- The ER-PIN does not list any leakage risks associated with the ER-P implementation. But, ironically, it provides an overview about how (imaginary) leakage risks will be addressed both at the domestic and international level.

- In order to address transboundary displacement risks, the ER-PIN mentions actions that have been implemented during the past decade but have shown little effectiveness in addressing the rampant illegal logging in the proposed ER-P area. Transboundary meetings, for example are not an adequate to addressing illegal logging across the region. What is really needed is better law enforcement and actions that address governance failures, such as corruption, that fuel illicit timber trafficking. There is a long and documented history of failed attempts by international agencies to tackle such problems in Cameroon.

Benefit-sharing: old wines in new bottles

- The ER-PIN proposes using existing benefit-sharing systems, notably the Annual Forest Royalties (AFR- *Redevance Forestiere Annuelle*) system, as an example of how benefit-sharing might be arranged. The current AFR system faces many problems and is highly controversial. Numerous reports, including a CIFOR case study⁴, have shown that this mechanism has achieved poor results in lifting forest communities out of poverty. This has been echoed by another case study⁵, developed in 2013 by the Accra Caucus, which raises concerns about using existing benefit-sharing systems to inform the development of a REDD+ benefit-sharing mechanism, as *“existing systems have had mixed results, with sometimes negative impacts on local development and poverty reduction. To avoid elite capture, and the corruption which has beset other areas of resource distribution in Cameroon”,* the study highlights *“that the rules for the distribution of REDD+ benefits must be based on a transparent and participatory process involving all stakeholders and rights-holders”*.
- The ER-PIN fails to explain how to prevent similar problems such as the risk of elite capture, the current suspension of distribution of the 10% of AFR to local communities by the government, etc.

Recommendations

- In light of the significant shortcomings and risks identified in the proposed ER-PIN, we strongly recommend to the Carbon Fund participants do not endorse it at the 13th Carbon Fund meeting.
- We urge the Cameroonian government to reconsider its current approach to the participation of local communities and indigenous people, and call for the proper and effective participation and consultation of local communities and indigenous people that is ultimately necessary to ensure the success of the ER-P implementation.
- We urge the Cameroonian government to achieve substantive results of the REDD+ readiness work, such as the assessment of drivers of deforestation and forest degradation, and the consultation of local communities, before moving towards the submission of an ER-PIN.

⁴ Cerutti, P. O., Lescuyer, G., & Assembe Mvondo, S. (2010). Forêt, création de richesse et réduction de la pauvreté: l'exemple de la Redevance Forestière Annuelle au Cameroun. *COMIFAC News*, 8.

⁵ Accra Caucus on Forests and Climate Change (2013), *REDD+ safeguards: more than good intention*

We, thank you for your prompt consideration of these recommendations. Please feel free to contact us with any questions or clarifications.

Yours sincerely,

Moise Kono and Patrice Kamkuimo on behalf of the following signatories' organizations from the Community Forest Platform⁶ (AAFE BEN, ABAWOMI, ADEBAKA, AFDECDH, AJDUR, AJESH, APED, APRIAATE, ASBAK, ASTRADHE, BACUDA, CADDAP, CADER, CAFT, CAJAD, CED, CeDLA, CEFAID, CEREP, CENDEP, CERUT, CIEFE, COMINSUD, CRADIF, FAJOID, FCTV, FODER, GDA, Nature Cameroon, ONED, PAPEL Cameroun, PERAD, ROCAME, ROLD, ROSE, RUDEC, SAILD, SEFE)

Eric Parfait Essomba, Congo Basin Campaigner, Environmental Investigation Agency

Indra Van Gisbergen, Forest Governance Campaigner, Fern

Anouska Perram, Lawyer, Forest Peoples Programme

Simon Counsell, Executive Director, Rainforest Foundation UK

⁶ The Community & Forest Platform (CFP), is a platform of Civil Society Organizations (CSOs) in Cameroon active in forestry and related fields, and representative of the regions of dense rainforests of Cameroon. Previously called European Community Forest Platform (ECFP) because it was established in July 2002 in order to ensure that aid from the European Commission should have a positive impact on forests and their populations, the new name, Community & Forest platform (CFP), was adopted at the plenary meeting in August 2014, to further reflect the dynamic of response of the platform and its affiliation. E-mail : plateformecfp@gmail.com ; Blog CFP: <https://plateformecfp.wordpress.com>