

Democratic Republic of the Congo

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MINISTRY OF THE ENVIRONMENT

AND OF SUSTAINABLE DEVELOPMENT

GENERAL SECRETARIAT FOR ENVIRONMENTAL

AND SUSTAINABLE DEVELOPMENT

THE SECRETARY GENERAL

The following persons are copied:

- His Excellency the Minister for the
Environment and Sustainable
Development

- Mr. Director-Head of Service for
Sustainable Development
in Kinshasa / Gombe

- Mr. Director-Head of the National
Information Service Center on the
Environment in Kinshasa/Limete

-Mr. The National REDD Coordinator
in Kinshasa/Ngaliema

To the attention of: **Dr. Peter Holmgren**

Director General Center for
International Forestry Research, CIFOR
E-mail: p.holmgren@cgiar.org

**Re: Clarification Points from the Ministry of Environment and
Sustainable Development of the DRC on the results of the Study on
the risks of corruption in implementing the Program on the REDD+
process in the DRC U4 Issue (April 2015, no. 9)**

Mr. Director General,

I would like to inform you that CIFOR has published on its website the study referenced above, relating to risks of corruption and mitigation strategies in the implementation of REDD+ in the DRC.

This study by Mr. Samuel Assembe-Mvondo brings us to call to the attention of your Center some firm points of clarification against the counter truths contained in this study.

While noting some improvements recorded by this country in this process, the author of the study notes that “the climate of bad governance” in the country is likely to constitute a handicap for progress towards effective implementation of REDD+ in the DRC particularly due to: (i) endemic poverty, (ii) the weakness of state authority and (iii) generalized corruption that "characterizes" the current political environment of the DRC.

The author said he had identified, as a result of his research, four types of corruption, as follows:

- (i) payments of kickbacks for awarding contracts,
- (ii) the politicization of management positions,
- (iii) financial mismanagement and
- (iv) the lack of transparency in the recruitment of international consultants.

The author recommends as a result of his findings, the establishment of an independent body in the DRC in order to ensure the proper management of processes and projects relating thereto.

1. General comments

In general, the study raises a number of questions that will be difficult to answer in just these few lines. The study does have the merit of informing an ongoing debate – that of the issue of corruption risks in REDD+. The study also helps in sensitizing national and international opinion on issues related to the implementation of the REDD+ process in DRC.

In fact, the study reflects the concerns of the Government, which has placed the issues of transparency, participation, information, communication and the fight against corruption in all sectors of national life, at the center of its actions in order to make REDD+ a real catalyst in the green growth of the DRC.

That being said, the study calls for the following critiques:

2. Report structure

(i) Absence of a contradictory character in the methodological approach

- The government party, through the Ministry of Environment and Sustainable Development, was never approached for comments.
- Neither was the National REDD Coordination (CN-REDD) program, which manages the process on a daily basis, approached for comments.

To ensure broad representation of views, the study should have delved deeper and attempted investigations/surveys/interviews to probe, also, the offending parties.

At this stage, we consider that the study was only half completed since all stakeholders were not included, and for the purposes of qualitative study, it is essential to engage in open and contradictory debate.

(ii) Out of date information

- The author goes back to the scourge of “Zairanisation” but does not make the effort to emphasize the efforts made by the Government to fight against corruption, which strikes indiscriminately all over the world.
- The sources cited as being part of the “REDD+ task force” in 2013 were not specifically interviewed for a focused study on corruption.

(ii) Opaque and clandestine nature of the study

- All studies conducted in the DRC in the context of REDD+ since 2007 had been previously announced to stakeholders and preliminary findings were shared before their publication, without infringing on the independent character of the studies.
- The present study was conducted in a “clandestine” manner, since it was not communicated to the stakeholders.

3. Report content

(i) Lack of reference to Government efforts

It should be noted that no reference to government efforts was made, despite several initiatives taken by the Government that deserve to be highlighted. For example:

- One of the seven pillars of the Government strategy on REDD+ is to take into account the concept of “governance”.

- The development of the REDD+ National Registry, which is a tool to improve transparency.
- The development and progressive implementation of the Integrated Communication Plan to ensure that all stakeholders have access to valid and reliable information on REDD+ in the DRC.
- The inclusion of REDD+ measures in the Economic Governance Matrix signed between the Government of the DRC and the Bretton Woods institutions.
- Consultations with various stakeholders on environmental and social safeguards.
- The development of a work program for the training and support of the judicial apparatus in the fight against corruption in REDD+ and illegal logging.
- The development of the Harmonized Guidelines for the effective implementation of Free and Informed Prior Consent (FPIC), making the DRC the first African country to engage in this participatory transparency dynamic, etc.
- The national REDD+ Coordination conducted in 2012 with support from UNDP/DRC, a study on the risk assessment of corruption in the REDD process in the DRC (study cited by Mr. ASSEMBE MVONDO), which is a study to be finalized as part of future funding.

(ii) Access to information on REDD+

The study argues that the information on REDD+ is the sole prerogative of the elite of Kinshasa. The study ignores substantial progress made in the following ways:

- The deployment of the REDD+ process with the installation of Provincial Focal Points, which are relays for actual implementation with local communities;
- Capacity building of stakeholders through, among other things, the organization of provincial REDD+ universities (Bandundu Province, soon to be Orientale Province, Kasai Oriental), and workshops and technical meetings at the provincial level;
- The organization of workshops in provinces to build on the experience coming out of pilot projects and REDD+ initiatives;
- The implementation of REDD+ projects on the ground, etc.

(iii) The non-involvement of local communities in forestry resource management

- No reference was made to the Decree on Community Forestry recently approved by the Prime Minister, a true framework that organizes land tenure for local communities over their forests.

(iv) Transparency

Recruitment of experts and consultants:

Recruitment of REDD+ staff and national and international consultants is always done on a competitive basis with a call for expressions of interest, according to procedures for technical and financial partners who support the DRC in this process (UN-REDD, World Bank and ADB).

Funding process:

The financing and the implementation of REDD+ activities have always been made in accordance with procedures approved by donors. The donors have always requested annual audits, including mid-term reviews to assess the progress of the implementation.

Please do take note that the MEDD had formally requested the publication of the audit on the implementation of the REDD+ process in the DRC by the UN-REDD Programme.

Structure of the implementation:

Transparency mechanisms are being developed, including (i) a “REDD+ benefits sharing mechanism” that ensures equitable benefits from REDD+ activities, while ensuring that local communities are not disadvantaged; (ii) a “complaints mechanism” that allows all stakeholders, particularly local communities, to manifest their complaints and receive feedback; (iii) the REDD + National Registry that allows for an approval procedure to record, through an interactive platform, any REDD+ project and initiative in the DRC; and (iv) environmental and social safeguards that ensure REDD+ projects and initiatives are aligned in their respect for both people and the environment.

In addition to these implementation tools, transparency is reinforced by the presence of an Independent Observer and a Moabi platform, which ensure competent monitoring.

4. Conclusions

It is evident that the risk of corruption was identified in a clear way not only in the REDD+ Readiness Preparation Proposal (R-PP), but also in the National REDD+ Strategy.

However, the Government through the MEDD, is striving, with other sectoral departments, national stakeholders, especially civil society organizations, and partners and donors, to establish and strengthen the legal and administrative framework which will allow the fight to be effective and permanent against corruption, which is a scourge that undermines development in all countries.

I would kindly appreciate if you could publish this letter on your web site, and I thank you in advance.

Please accept, Monsieur le Director General, the assurance of my sincere consideration.

Vincent KASULU SEYA MAKONGA