



Date: 3rd November 2010

Ref: PNG NJP-Oct 2010/EFF

To: Veerle Vandeweerd, Vincent Kasulu, Co - Chairs of the 5th UN-REDD Policy Board
Yemi Katerere, Head, UN-REDD Secretariat
Helen Clark, Administrator, UNDP
Achim Steiner, Executive Director, UNEP
Jacques Diouf, Director General, FAO
Dr. Wari Iamo – Secretary of DEC/Acting ExD OCCD – Government of PNG
Dr. David McLachlan-Karr, UN Resident Coordinator, Papua New Guinea

Copied: ALL UNREDD Policy Board Members/Donors

Subject: PNG EFF's Comments and Conditional Endorsement for the PNG National Joint Program to the UNREDD Policy Board

Dear Co-Chairs,

Sirs, this submission to you is based on an email in response to the Head of UN REDD Programme Secretariat Dr. Yemi Katerere calling on Policy Board Members/Observers, to comment on matters that are to go before the Board at this meeting.

PNG Ecoforestry Forum (PNGEFF) representing the Asia-Pacific CSOs on this Board endorsed the PNG Government's request for 6 months extension on the NJP preparation/submission and also informed that, PNGEFF will make a further submission at this meeting. And here we submit our comments and submission in relation to the NJP that as submitted to the UNREDD Secretariat last month (October) which is now before this Board for deliberations/discussions and finally to arrive at a decision.

I hereby submit this letter expressing the following;

1. General overview of the NJP with specific details (attached).

2. PNG Ecoforestry Forum's General Endorsement of the PNG NJP, with a set of 16 conditions for the Policy Board to take note of now for deliberations/discussions. We have listed the conditions starting with **high priority** issues to be addressed over the immediate short term (6 - 12 months) and **secondary priority** issues to be addressed jointly with the high priority issues or individually over the longer term that is in the next 6 - 24 months.

1. General Overview of the New NJP/2010

The new NJP document submitted is well designed and technically attractive and captures nearly all thematic requirements set out in the UN-REDD guidelines. There is clear evidence that the NJP directly links to the PNG Government's Medium Term Development Goals and the Vision 2050 plan.

However, compared to the similar NJP of 2009, the current NJP submitted did not incorporate any contributions from the main State agencies such as PNG Forest Authority, Lands Department, Department of Environment and Conservation, and the Department of Agriculture and Livestock. The "Whole-of-Government approach" model mentioned in the Climate Compatible Strategy was not practiced. PNG Forest Authority for example, was surprised when the new NJP surfaced for comments without an explanation on the previous document.

The 2009 NJP captured nearly every issue surrounding REDD, and was developed through multi-stakeholder (State agencies) participation including inputs from NGOs, CSOs and IPs. There were significant contributions from development partners as well.

PNGEFF as an national/indigenous umbrella CSO organization hoped for something better, but noted that the *new NJP was designed and inscribed in isolation*, and based on our analysis and findings we hereby give general endorsement and support to the PNG Government, but with specific and targeted conditions in order to improve the NJP in general, and that is to include and involve all stakeholder participation, enhance "Whole of Government Approach" for better coordination to deal with REDD+, set clear, transparent and good governance processes in place, thus bringing credibility, respect and trustworthiness to the country's eroding image internationally on the REDD agenda.

2. Conditions for the General Endorsement

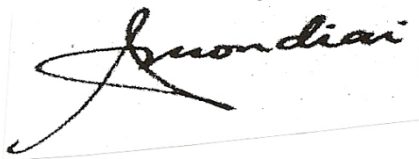
Listed below are the set of conditions setting out clearly in order of priority (**high and secondary priority**) to be dealt with within a period of 24 months, whereby the conditions are to be monitored at the country level jointly by the UN Resident Representative as one of the Co-Chairs along with a Government Co-Chair (from PNGFA/OCCD) and to report on progress to the UNREDD Policy Board through the Programme Secretariat.

1. EFF and civil society in PNG view that the general management of the process that led to this NJP was isolated to key government agencies and much is at stake in terms of consultation, participation and full engagement. **The whole process approach needs to be reviewed for sector wide input. (High Priority)**
2. EFF and civil society in PNG endorses the document only if and when the **ownership of the NJP** is clear that indigenous peoples are the major players in the REDD processes in order to build confidence and trust among stakeholders. **(High Priority)**
3. EFF and civil society in PNG calls on the Government of PNG to clearly focus on the safeguards, capacity building, stakeholder engagement and awareness in PNG at local levels. There must be full and effective involvement and participation of indigenous people in REDD processes. **(High Priority)**
4. EFF and civil society in PNG wants governance and transparency issues at stake must be clearly addressed. **Good governance and transparency did not guide the development of the NJP document.** A transparent process need to be adopted. **(High Priority)**
5. EFF and civil society in PNG wants a clear framework for rights and responsibilities of different stakeholders and government agencies in REDD+ activities and their relative involvement with landowners and forest communities. **(High Priority)**
6. EFF and civil society in PNG calls on the Government of PNG that stakeholder engagement and consultation are terms constantly used, but there is no clear indication of the process how they are being, or will be engaged and what specific contributions these stakeholders will be required to engage and contribute in the existing three tier government system (National, Provincial and Local level). We call for the specific ToR with clear mapping of the process for all stakeholders. **(High Priority)**
7. EFF and civil society in PNG calls on the Government of PNG through the National Forestry Board to immediately impose a **nationwide moratorium** on **ALL NEW** logging concessions and including the non extension or renewal of expiring Timber Permits (TPs), Timber Rights Purchase (TRPs) and Forest Management Agreements (FMAs). **(High Priority)**
8. EFF and civil society in PNG call for the Government of PNG to **set up a broad based team for a judicial review on the EXISTING logging concessions** throughout the country. **(Secondary Priority)**

9. EFF and civil society calls for the exclusion of the abatement action of **Reduced Impact Logging** practices in any REDD processes until and unless satisfactory implementation, monitoring and enforcement guidelines and strategies are developed. **(Secondary Priority)**
10. EFF and civil society in PNG demand the Government of PNG to halt **the shifting and expansion of oil palm** development and expansion of agro-forestry activities in forested and/or degraded lands. **(High Priority)**
11. EFF and civil society in PNG accept and endorse the NJP, but only when and if the Government of PNG **nullify all existing agro-forestry land leases totaling over 4 million hectares.** **(High Priority)**
12. EFF and civil society in PNG endorse the NJP only if and when the **exclusive focus on MRVs is removed and emphasis placed on social and environmental safeguards.** **(High Priority)**
13. EFF and civil society in PNG demand a review of the MRVs and clear emphasis must be placed on methodologies for data collection and the design aspect of stakeholder engagement in the MRV data. **(High Priority)**
14. EFF and civil society in PNG endorse the NJP only if and when the top-down MRV approach clearly highlights the institutional capacities for a transparent MRV system. **(High Priority)**
15. EFF and civil society in PNG endorse the NJP only if and when the 'pass-through' texts adopted are removed so that funds managed through the 'pooled approach' by a Board/Committee chaired by the UN Resident Representative in PNG, rather than UN Agency HQs. **(Secondary Priority)**
16. EFF and civil society in PNG calls on the Government of PNG to develop a National Landuse Management Plan under the UNREDD process, as there is clearly uncoordinated natural resources development projects all over the country without clear demarcation of boundaries thus, it a catalyst for major landownership disputes, while REDD+ has the potential to trigger social and developmental problems. **(High Priority)**

I look forward to fruitful discussions, questions and deliberations from the UNREDD Policy Board Members whilst considering the 16 prioritized set of conditions above and for a positive outcome for PNG to move forward with REDD.

Thank you

A handwritten signature in black ink, appearing to read 'Quondiai', written on a light-colored rectangular background.

Kenn Mondiai

**UNREDD Policy Board Member/Observer - Representing Asia – Pacific CSOs
Chairperson of Board of PNG Ecoforestry Forum Inc.**

Attachment: Detailed Comments on the PNG National Joint Program & Conditions

Position and Comments on the PNG National Joint Program to the UNREDD Policy Board 5th Meeting in Washington DC, USA – 3-5 November 2010

Overview

The Papua New Guinea Ecoforestry Forum (EFF) is a not-for-profit nongovernmental organization made up of more than ten (10) civil society organizations. Our collective effort is to promote good governance and transparency in the resources sector in PNG so the people equitably benefit from them. The main resource sectors EFF focuses are forestry, land, mineral and water resources and associated development issues. PNG EFF is committed to see sustainable development in all these sectors especially in the forestry sector. More recently, the issue of climate change and REDD is directly linked to the forestry sector and EFF would like to see a better REDD mechanism set up for PNG.

It is quite critical at this point to say that the manner in which REDD mechanism for PNG is being developed is marginalized and not in the best interest of indigenous peoples and forest communities. The UN-REDD principles clearly stipulate broader inclusive stakeholder participation including NGOs and local communities, the UN-REDD NJP for PNG, in our view was prepared in isolation and we have the following as conditions for endorsement of the NJP document.

EFF endorses the NJP document, but our support is conditional based on the following outstanding issues that must be seriously addressed:

Introductions

While we did not have sufficient time to provide detailed comments on the NJP , which we received five days before the due date of October 1 2010 at the National level prior to its submission, we are hereby highlight a few concerns. Other comments detailed comments will be submitted nationally.

1. In adequate Stakeholder Consultations

We express our concerns concerning the lack of proper consultation with the different stakeholders including the different government departments and agencies, Civil Society Organizations, NGOs, CBOs, Churches, Provincial governments, local level governments etc. This concern has been expressed in the Technical working group meetings. It was highly perceived by the government that the REDD technical Working Group meetings were consultations. TWG meetings were technical meetings and they cannot be substitute for proper consultation which promotes inclusiveness and ownership.

The clear example is the preparation of this actual NJP document. We were never part of it until we saw the draft.

2. Capacity Building

Capacity Building is the next most important aspect. This document is focusing more on MRVs and not on the other capacity development aspects that will make REDD successful. For instance capacity building on benefit sharing, conflict resolutions, that will manage, sustain a successful implementation.

At the same time the readiness management arrangement focuses to build the capacity of and strengthening the capacity of the Office of Climate Change and Development and not other developments that are very import in the REDD implementation in the country. We believe that this needs to be relooked.

3. Safeguards

Under the Government's REDD+ Project Guidelines, social, environmental and fiduciary safeguards are mentioned but it is not clearly reflected in the NJP. This document passes the responsibility to the project proponents to ensure safeguards are promoted, but makes no mandatory provision for compliance. Maybe it will be done later.

We needed to be assured that communities or resource owners (who own 97% of the land), and who will be affected either positively or negatively must be engaged. They need to give **Free Prior Informed Consent** because their livelihood depends on the land and how they use the land. However, the NJP is very silent on this safeguard. As mentioned above, community engagement process was never conducted

The Rights of communities must be acknowledged and promoted as well. PNG is a signatory to a number international conventions and instruments including the ILO 169 etc and therefore must take into account when dealing with safeguards.

PNG is unique in its **biodiversity** it holds 5% of the worlds biodiversity and it is a home of a number of unique species including the Bird of Paradise and the Bird Wing Butterfly and a number of other endemic species of plants and animals. We need to protect such uniqueness. Forests are more than carbon. We need to consider also the environmental services.

4. Management of process/governance

The project management arrangements are not yet clear nationally and abroad. Nationally the respective roles are not clear and it is a challenge for different stakeholders.

It also looks like more focus is MRVs and 90% of the funds will go to FAO based in ROME and not a resident agency. UNDP is a resident agency (with an office in-country) and why is it, that the Funds will be transferred to FAO and not UNDP.

We also question the 'pass-through' because this may be difficult. If all the UN agencies really want to promote this as a truly "joint program' as the title calls, why splitting the money. We suggest that we

use the 'pooled approach', channel all the money to UNDP country office because this option is likely to be the most effective option, also for monitoring purposes as the agency is resident in PNG.

5. MRV should also include monitoring governance aspects of the project.

Detailed Comments as per the NJP.

EXECUTIVE SUMMARY

a. OK

2. Situation Analysis

2.1. PNG Context

- ❖ While we are blessed with many natural resources, translating these into tangible benefits has been a struggle for PNG and REDD is seen by many as a means to fill in the developmental gaps that exist. Deterioration of government infrastructure to support REDD plus implementation is also a notable concern.
- ❖ The richness of PNG's **biodiversity** needs to be emphasized here because biodiversity maximizes long term stability of the carbon pool. The provision of environmental or ecosystems services in supporting REDD Readiness. The issue of payment for environmental services needs to be mentioned or promoted.
- ❖ Cultural diversity and varied ethnic groups needs to be reflected, and point out how some current development models are eroding the fabric of these complex communities/societies.
- ❖ International Treaties and Agreements that PNG has signed and ratified, for instance, the CBD, International Human Rights Convention, UNFCCC needs to be highlighted here. This is to ensure that PNG does not contradict PNG's existing commitment.
- ❖ Land tenure and rights issues needs to be clearly mentioned here from the outset because REDD+ is about respecting the rights of the forest dependent communities and addressing the issues of safeguards which are crucial to a successful REDD+ implementation.

2.2. Forestry Sector in PNG - Description

- ❖ We need to reorganize them so that there is a clear flow of the information presented. Currently the information is not presented in a structured manner with clear subheadings.
- ❖ Commercial Timber operations should also include the challenges faced and how these challenges may affect REDD+ implementation, what we intend to do to overcome this.
- ❖ Commercial operations and agricultural leases needs to elaborate the complexity of PNGs land tenure systems.
- ❖ small timber resources, we need to also note the abuses that have been noted on the use of the TAs and the lack of environmental safeguards by operators – NFA should describe this better.

Agricultural Leases

- ❖ Forest Conversion for agricultural development has increased over the last few years and it is one of the key drivers of deforestation or has a very high potential to do so. This needs to be clearly stated in the situational analysis because this will have an influence in the discussions on REDD+. New information indicates agricultural leases up to 4. Million ha.
- ❖ It is important to harmonize the roles and functions of DAL and Lands which warrants extra efforts in improving coordination of whole-of-government approach to REDD+ implementation.

Reforestation (Afforestation???)

- ❖ The subtitle should include Afforestation as well as it is an important component taking into account the government's efforts to afforest vast grassland areas in the highlands valleys.
- ❖ There is no mention if we ever or are planning to participate in the AR projects under the CDM – Kyoto protocol? Were there challenges, how would it be different?
- ❖ Reforestation of logged over areas, enrichment planting etc is a requirement under the existing forestry guidelines. Reforestation levies that are provided by the logging companies to sustain the resource base by reforestation and enrichment planting needs to be taken note of and encouraged.
- ❖ If we are to reforest logged over areas (degraded forest) to prevent it to be converted to plantations, how does this fit into the Reduced Impact Logging (RIL)? **We need to avoid forest conversion.**
- ❖ The document is silent about Private sector incentives for promoting plantations????

Sector Regulatory Framework

- ❖ PNG has strong forestry sector laws and therefore strong basis for REDD implementation but **compliance** and **enforcement** has been our continued challenge.
- ❖ How do we want to overcome this under the REDD initiative? Emphasis needs to be placed on respective policies to be developed to support REDD+ activities.

Progress on the domestic stage

- ❖ We need to mention when the office of climate was actually set up for fairness and justice. There was work done under Dr. Theo and also controversies which eventually led to his removal. We need to admit, at least in a few lines the history of what happened because the information already spread.
- ❖ There was also overseas missions like the Norwegian, UN Mission that needs to be reflected here. We will do injustice to work already done.
- ❖ The four regional consultations needs to be mentioned, pointing out the key concerns raised as well as the REDD Road Map, that we already part took to prepare.

OCCD Organizational Structure (Exhibit 2)

- ❖ The Position of Executive Director is still vacant. This position needs to be filled urgently. There is no indication as to when this provision might be filled.

- ❖ While in the process of getting the work of the OCCD going, the Department of Environment and Conservation is deprived of sufficient attention, especially when there are big natural resource projects in the country and subsequent Controversial Environment Act Amendment. Since these departments are key stakeholders they need to be managed by two people and not by one person as is the case now.
- ❖ The roles of the different policy analysts mentioned in the organizational structure is unclear as to the specific roles. More work gets done and effectively when staff have a clearly demarcated responsibility. AT this stage we do not know what the analysts are doing.

The OCCD's Governance Structure

- ❖ There is a need to allow NGOS and CSOs to sit on the National Climate Change Committee currently made up of Departmental Secretaries. This is to promote good governance and stakeholder engagement.
- ❖ As key stakeholders we need to know who is on the Advisory Board, and a clear description what their role really is. We remember, some names were mentioned but we are not sure who is on this committee.
- ❖ We know that PNG is being represented by other people who are working for the Coalition for Rainforest Nations. This is not reflected in the structure.

3. Strategies including lessons learned and proposed joint program

- ❖ The 50% net GHG reduction by 2030 is too ambitious and carbon neutral by 2050 unrealistic. We need to mention where the cuts will be concentrated. For example how much is going to be cut down from forestry (RIL), LNG, etc.
- ❖ We need to point out the lessons learned. For instance during the Road-shows we learnt that the issue of climate change is complex and needs more awareness.
- ❖ There was also disagreement on the National and sub-national Implementation modalities though the government is promoting National approach.
- ❖ This section also needs to point out the challenges of having a National Forest Inventory done. Firstly it is costly, and therefore forestry has never done one (a one which involved forestry officers actually doing the fieldwork in the field). We need to point out how we want to overcome this at this stage.
- ❖ Under the potential PNG System for MRVS under the UNFCCC other stakeholders are not mentioned including Agriculture Department, mining Department, because these depts. Will affect the process.

4. Results Framework/Outcomes

1. Readiness Management Arrangements

- ❖ To effectively build and enhance capacity we needed to do a capacity analysis of the current staff and other Capacity gaps within the governance structure of the OCCD.
- ❖ We want to raise two concerns concerning staff capacity. Firstly, the Position of Director is still vacant. This in itself is a crucial issue. How can we operate an office with an Acting Executive Director who already has exhaustive responsibilities, in ensuring environmental sustainability

within the context of natural development. Taking the Secretary of the Department of Environment and Conservation to head the OCCD in the interim and his Deputy now as one of the directors is doing injustice, not only to the different but also to the issue of REDD and climate change. We need full time staff, and at no cost to other departments.

- ❖ Why do we want to employ a “Shadow Director” (From FAO – Financial implications?) Why a shadow director when the position of Director is still yet to be filled. Is it possible to source from partners?

2. National MRV System Developed

- ❖ Within the context of the MRV system, capacity development on MRV implementation is important. Capacity development should also consider other stakeholders as well, based on the respective roles each stakeholder is to play in the overall process.

3. Historical Drivers of Deforestation

- ❖ Drivers of deforestation must be dealt with to achieve the reduction targets. As a readiness activity, there needs to be a proper assessment of what actually triggers deforestation and degradation and plan ways to address those causes.
- ❖ We also need to mention trends of deforestation here.

4. Monitoring of Abatement Concepts

- ❖ The document intends to build the capacity on Reduced Impact Logging (RIL) for NFS staff but our concern is that the Industry, CSOs, NGOS are not mentioned in the document.

5. Stakeholder Awareness of REDD-Plus Activities.

- ❖ Awareness among stakeholders on REDD is important for informed decision making and promotes ownership of the REDD+ initiative. This must involve actual engagement and discussions and policy formulations.
- ❖ The design of the stakeholder awareness focuses on what OCCD (government) will tell the stakeholders about their plans, and very silent on active stakeholder engagement with respect to the perceptions they have on REDD+. The title of this outcome should be changed to **Stakeholder Engagement**.

5. Management and Coordination Arrangement

5.1 Overall Arrangement

Policy Board

General mention is made of the Policy Board we are not clear on who should be consistently representing PNG Interests. We have been made aware that a number of meetings have been made so far but, we do not know who represents us there and how consistent is that representation.

We also understand that a key member of the Coalition for Rainforest Nations represents PNG interests, but firstly, how familiar is he on PNG issues? And secondly why can not one of our own staff from Forestry for instances represent us.

One of the roles of the PNG representative on the Board is to communicate Policy Board Decisions to the stakeholders but, if what has happened with the first NJP submission is any indication, we really have a transparency and communications issue, which are both key elements of a successful REDD process.

I also would like to suggest that the PNG Representative on the UNREDD Board should be made know to the stakeholders.

UN-REDD Secretariat

OK

5.2. Management Arrangement at the National Level.

- ❖ It is also emphasized here the crucial role of the Executive Director, therefore we reiterate our call for the immediate recruitment of the Executive Director which is now vacant. The current is also the Secretary of the Department of Environment and Conservation.
- ❖ There seems to be a lot of committees and Board mentioned in the document. We also need to clearly define the respective functions of each of the entity without duplicating the functions and roles so that we are efficient.

6. Fund Management Arrangement

ok

7. MRVs

- ❖ We are focusing too much on MRVs and I guess the issue of capacity building is not prominent. While the government promotes Whole of Government Approach, there is less mention of sectoral policies to support the REDD Plus activities, especially Agriculture and Forestry. Will our activities from now comply with existing sector policies or will the sectors redo their policies to align with the Climate Compatible Development Strategy?
- ❖ I guess one of the first steps is to take a stock of the existing policies and how those comply or are relevant to the Low Carbon Development Strategy, to see if there are synergies. This is important because linkages between different departmental policies have sometimes prevented coordinated development. This is where the so called Intensive Government of PNG Consultations mentioned in this document practically apply.

- ❖ Coordination of respective MRV elements needs to rest solely with the appropriate department or authority, with the OCCD only overseeing. The document rightly identifies this but needs to start formulating clear roles for the respective institutions and departments and start to identify respective capacity requirements. These capacity assessment should form the basis of a capacity building framework for full REDD implementation. For instance National Forest Inventory should already be a responsibility of the National Forest Authority. We need to build on from the PNG Australia Forest Carbon Partnership

8. Legal Context

9. Work plans and Budgets

General Comments

Before specific comments are provided it is important to point out that stakeholder engagement and capacity development are important REDD+ readiness activities. Civil society and NGOs are important stakeholders and their capacity needs must also be met, as agreed in the initial NJP submission, which has now been amended with text from the Low Carbon Development Strategy.

One of the key stakeholders is the forest dependent communities. It is not clear how local communities will be engaged in the REDD Readiness process. From the initial Regional Road shows, we became clearly aware that there was more need for proper awareness. The REDD+ issues are complex and we need to address this issue very carefully because they hold the key in terms of permanence and leakage.

There is general mention of meetings and consultations but it is not clear as to what issues will be discussed.

Outcome 5. Stakeholder Awareness – there are a number of NGOs already working in carrying awareness on REDD plus issues, and it is not clear how the work of the NGOs will be supported. For example EFF is already conducting workshops, this has to be supported with funding directly.

Situation Analysis

Climate Compatible Development

- There is mention in this document of a draft Climate Compatible Development. When will it be completed? Are we in a position to give dates? There are some documents that also mention that the Strategy has been approved.

MRVs

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Safeguards

- Safeguards is mentioned but we need to clearly mention what those safeguards are. They need to be clearly spelled out from the outset.
- **The document does not manage any challenges and how the readiness funds will address those issues, especially those issues on safeguards.**
 - **Biodiversity**
 - **Land-tenure**
 - **Rights of the people to be informed - FPIC**

(a) The new NJP document – 2010 October

The new NJP document submitted is well designed and technically attractive and captures nearly all thematic requirements set out in the UN-REDD guidelines. There is clear evidence that the NJP directly links to the Medium Term Development Goals and the Vision 2050 plan. However, compared to the similar NJP of 2009, the current NJP submitted did not incorporate any contributions from the main state agencies such as PNG Forest Authority, Lands Department, Department of Environment and Conservation, and the Agriculture Department. Whole-of-government approach model was not practiced. PNGFA for example, was surprised when the new NJP surfaced for comments without an explanation on the previous document.

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(b) Sectoral consultation, participation and engagement
Forestry, Lands, Agriculture, Environment.

The PNGFA is the legal custodian of all Forest Management Areas but was not fully consulted in every process of the NJP development. There was not clear contribution of texts and input from the PNGFA, and it is a great concern to EFF.

In terms of land, 97% of land in PNG is customarily owned, and most of these lands are forested. REDD is complicated and every process need to be understood. We noted that the department of Lands did not participate through every process that led to the synthesis of the NJP. Involvement in the Technical Working Groups is different from contributing actually to the NJP document.

With reference to agriculture where REDD+ activities are concerned, the agriculture sector is also a key player but it was quite obvious to state that agriculture department was also not entirely involved in the processes leading to the synthesis and development of the NJP document.

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