

**A CRITICAL ANALYSIS OF R-PP EL SALVADOR**  
(Submitted officially to the World Bank's FCPF April 21, 2012)

**I. Commitments and obligations on Climate Change**

1. According to statements by the highest political level in El Salvador and Central American Integration System (SICA), (both ministerial and presidential), adaptation to climate change is a national and regional priority due to high levels of socioeconomic and environmental vulnerability and high and increasing negative impacts due to current and future climate change and related variability projected by climate models.

2. The Durban Platform and the Cancun Agreements adopted by the government of El Salvador, state that developing countries should develop and implement National Adaptation Plans (NAPs) and Nationally Appropriate Mitigation Actions (NAMAs). In the case of El Salvador, since 1998 the Law on Environment and Natural Resources states that the Ministry of Environment and Natural Resources (MARN in Spanish) must develop and implement a National Plan on Climate Change.

3. As a result of the decisions of Cancun and Durban, currently all developing countries are gradually defining and implementing their national policy on climate change, and tools for their implementation (strategies, policies, plans, programs and measures). This, on the basis of the guidelines, criteria and mechanisms of the decisions issued under the multilateral process of the United Nations Framework Convention on Climate Change (UNFCCC), specifically the Cancun Agreement and Durban Platform.

4. In El Salvador, although in 2007 financial resources were obtained (donations via Global Environment Facility, GEF) for the preparation of a National Climate Change Plan, and in 2009 MARN publicly announced the launch of this process, up to the current date, its completion has been rescheduled several times, and there is neither a National Strategy on Climate Change, or an official open, transparent and participatory process for the elaboration of the NAP or NAMAs, in compliance with international commitments under the UNFCCC Framework and decisions of Cancun and Durban.

**II. The "Mitigation based on Adaptation" Approach (MBA)**

5. According to the spirit, assumptions, guidelines and stipulations that REDD-plus schemes were agreed and adopted at the multilateral negotiations on climate change, they are a mechanism designed consistently for mitigation of climate change, since the previous attempts that were addressed under the issue of adaptation did not achieve the required consensus and were therefore discarded. The REDD-plus mechanism was adopted as a mitigation option, which is only indirectly linked to adaptation through some of the seven safeguards adopted for the implementation of REDD-plus, since consensus was also not reached on the explicit inclusion of the (necessary) subordination, synergy or at least linkage of REDD-plus with adaptation. The main objective of REDD-plus is to reduce deforestation and degradation of tropical forests in developing countries by identifying and combating the originating factors.

In addition, REDD-plus is designed to offset the emissions of GHG from developed countries, against payment by the latter to be attributed the reductions in compliance with their quantified targets for reducing emissions "offered" in the Durban Platform and eventually enter into effect from 2020 under the new agreement to be negotiated in 2015. Such payments could be made effective through markets or funds via intermediaries such as the FCPF.

6. The "Mitigation based on Adaptation" (MbA) approach proposed by the MARN in the R-PP is presented as the approach that governs the design of the National Strategy on REDD-plus, and on that basis is linked to the National Program for Restoration of Ecosystems and Landscapes (PREP) implemented by the Environment Ministry, so that the proposed R-PP is referred to as Strategy PREP-REDD-plus-MbA, and suggests that the REDD-plus and the National Strategy REDD-plus as a whole, is also addressed under the approach of ecosystems and landscapes. This approach would mean that all components, processes, options or activities and results are consistent with each other and consistent with the goals of PREP-REDD-plus-MbA, as well as the overriding objectives of the Strategy and National Plan on Climate Change, which includes the NAP and NAMAs.

7. The approach of the MbA raised in the R-PP of El Salvador is based on a conceptual framework that ensures (or at least there are highlights of) the coherence, consistency and scientific support required, and as has been raised, against the spirit and body stipulations on REDD-plus adopted at Cancun and Durban. At the same time, unknown (since omitted) advances and the best knowledge on the science of climate change and adaptation that has already been generated under the multilateral process (IPCC, Nairobi Work Programme on Vulnerability, Impacts and Adaptation and the Adaptation Framework). In sum, the focus of the MbA is neither effective nor efficient in terms of its contribution to the objectives of REDD-plus, much less to the objectives of adaptation to climate change.

8. The MbA approach proposed in R-PP is a setback for El Salvador in relation to the efforts and progress in the issue of vulnerability, impacts and adaptation to climate change that had been achieved previously. This is a clear reflection that the process of developing the R-PP lacked participation and consultation with experts and institutions involved in processes, studies and proposals for mitigation and adaptation to climate change. Also, the R-PP does not recognize and ignores the concepts, rights and obligations under the 2007 United Nations Declaration on the Rights of Indigenous Peoples, and the rules and case law emanating from the Interamerican Indigenous Rights, as is the case of indigenous rights to ancestral lands and natural resources (IACHR, 2010). The treatment in the R-PP of the historical and current situation and the vulnerability, territories, rights and climate change challenges of indigenous peoples, is superficial and inadequate, and raises serious concerns for indigenous peoples in El Salvador.

9. The country's decision to define and adopt a National Strategy for REDD-plus should not come before the definition and adoption of a National Plan and Strategy on Climate Change and a National Adaptation Plan. REDD-plus is only a mitigation mechanism. Although it eventually could generate benefits that promote adaptation and is subordinate to it, REDD-plus must be conceived as a package of measures within the mitigation component, and therefore, must be designed at a level much lower on the hierarchy to the Strategy and National Plan on Climate Change. This means that the objectives and goals of a National

Strategy on REDD-plus should be governed by and subordinated to the higher goals and objectives of the Strategy and National Plan for Climate Change and the NAP. The Strategy of PREP-REDD-plus can not under any circumstances prevail, replace or include the NAP. The R-PP does not address the necessary coherence and consistency that the objectives and results of the National Strategy on REDD-plus should guarantee regarding the purpose, objectives and outcomes of the Strategy and National Plan for Climate Change and the PAN, as this national policy framework on climate change is not even mentioned in the proposal, which is a major weakness of the R-PP, as the building, strengthening and implementation of the policy framework on climate change are national and international obligations.

10. The MbA approach suggests that the REDD-plus options that would be implemented would have to contribute to adaptation to climate change, which leaves out the options for adaptation to climate change that do not contribute to mitigation, as they could not be considered options for REDD-plus. This reflects the lack of relevance and sustain of MbA approach, and that beyond the rhetoric and publicity around the "PREP-REDD-plus-MbA" troika of approaches, the proposed REDD-plus options, and the related effects and MRV system, have been designed (with serious deficiencies) under the conventional approach of the FCPF and the mechanism agreed upon in the multilateral process. This, compounded by the fact that the adoption of MbA and PREP approaches, introduces complexities for the approach to REDD-plus strategy, which are not addressed or resolved in the R-PP, and result in incongruence, inconsistencies and gaps, which is evident in all sections of the R-PP. In this regard and by way of illustration, in the following text, we will discuss some of the weaknesses in the section on "evaluation of land use, legislation, politics and forest governance (p.35):

- This section addresses **the state of ecosystems** but is limited to the different types of tree growth. It does not address forest ecosystems or forest as such, and leaves out the rest of terrestrial, aquatic and coastal-marine ecosystems. The approach is limited to trees and ignores the overall plants and animal species and microorganism in ecosystems, and the level of natural landscape, and does not address the ecosystem from its composition, structure and functions, including natural dynamics at the level of natural landscape and ecosystem. It delves into the historical causes of deforestation or current and future impacts of land use change on the right of indigenous peoples to access, use and enjoyment of their territories, and omitted any reference to the impact of climate change on ecosystems and human populations, particularly the most vulnerable, among which are indigenous peoples. The approach of this section demonstrates the ineffectiveness of MbA approach in terms of evaluating the land use change and its causes.
- On the other hand, **does not address the current manifestations of climate change and variability and its impacts on ecosystems**, which should include the impacts on plant and animal species, microorganisms, natural landscapes, structure, composition, functions and natural dynamics (e.g. fires, pests, diseases, carbon fertilization, population dynamics, biodiversity, connectivity, resilience, forest degradation and deforestation), which is essential for adaptation and MbA approach. In the sections on mangroves and wetlands, they are not addressed as ecosystems, whereas as coffee and sugar cane are not included current and projected impacts of climate variability and change, which could reduce productivity, disrupt their natural dynamics and composition and eventually make them collapse from climate maladaptation. On the other hand, the current trend of expansion of

sugarcane (e.g. central coastal plain) and conventional tourism and infrastructure (e.g. FOMILENIO II in the coastal zone), could threaten coastal marine ecosystems such as mangroves, as well as food security and access to land and territories to rural and indigenous peoples to their livelihood activities. Furthermore, removal of native forests for the later introduction of coffee cultivation in the mountainous and volcanic terrain (slopes greater than 45%), combined with poor land management through coffee farming, is one of the main causes of the current instability of soils in some of these systems (e.g. volcanoes of San Vicente, San Miguel and Santa Ana), because the coffee is cleaned by opening infiltration channels that weaken and liquefy the soil, leading to mudslides and landslides.

- This section also does not address **the impacts of climate change and variability in human settlements and other systems** (e.g. river, natural landscapes, territories, energy) and socio-economic sectors (e.g. agriculture, health, tourism). This section should address projections and future trends of climate change, the associated impacts and integral vulnerability of ecosystems and human populations and the generating factors of deforestation and vulnerability, which should include the public policies that generate vulnerability and climate maladaptation. Such is the case with the systems, technologies and farming practices that are not adapted to the climate and physical characteristics of the country and socio-economic conditions of small producers, developed and promoted under the Green Revolution approach imported via national governments and multilateral agencies, expansion of cane sugar or other crops for biofuels, large hydroelectric dams, major road, tourism, housing and productive infrastructure in fragile ecosystems (e.g. FOMILENIO I and II), such as mountain systems, wetlands and coastal and marine ecosystems, such as mangroves.

### III. “Climate variability” versus “climate change and variability”

11. Throughout the R-PP the focus on climate variability is completely disconnected from the science of climate change, to the point that although there are several studies on the subject, the changes already observed and future projections generated by climate change models in the climate of El Salvador, are not addressed. It is noteworthy that in the specific section on the impacts of climate variability, the analysis of interdecadal rainfall for 1971-2010 illustrated by the MARN on a graph (Fig. 5, p.55), seems to be an attempt to counter the findings of climate models, which indicate that rainfall in Central America could decrease with climate change, while the graph reflects a historical trend towards increased rainfall.

It should be noted that this chart shows the natural interdecadal variability, where it is shown that the most recent decade has been a wetter period in the region, while the 70s and 80s were relatively dry, and therefore is not extraordinary that over ten years the rain increased by 2%, and in addition to the forms of interannual variability associated with El Niño and La Niña, there are different forms of interdecadal variability. Experiments with climate models indicate that the effect of increased GHG in the earth atmosphere will be the reduction of rainfall in Central America, but also should be considered the effect of interdecadal variability, which is not properly reproduced by climate models.

12. Strategies and plans for climate change and the NAPs should be based on the best knowledge and knowledge generated on adaptation, which are based on international

consensus on the increasing pace and magnitude of anthropogenic climate change due to the increased of greenhouse gas emissions. Climate change occurs in all regions of the earth, showing changes in mean climatic variables (e.g., increased air and ocean temperatures, air humidity and sea level) and related climate variability such is the case of extreme climate events whose frequency and magnitude is changing (e.g. tropical storms and more intense droughts, higher maximum and minimum temperatures and more frequent heat waves), and changes in climate patterns (e.g. more frequent 100mm/day-rains, longer consecutive dry-day periods, delayed onset of the rainy season and more intense mid-summer drought of July and the August).

13. Climate change, including changes in associated variability, is generating increasing impacts in human health, damage and loss in human settlements, ecosystems, crops, infrastructure, socio-economic sectors, territories, among others, particularly in the most vulnerable countries and populations. Current and future climate change are determined and projected through climate change scenarios, and these form the basis agreed under the multilateral process framework (IPCC) to support assessments of current and future impacts of climate change and associated variability in different sectors and human systems, as in the case of agriculture, food security, human health, water systems, natural ecosystems (e.g. coastal and marine, aquatic and terrestrial, such as wetlands and forests), human settlements, and more. It should be noted that some of the climatic changes that occur and would occur in distant parts of El Salvador at global or regional scale, would affect El Salvador, as in the case of melting ice caps (e.g., changes in migration patterns of animal species), increased frequency of intense hurricanes (e.g. more intense tropical storms or persistent rain), the most intense ENOS event (e.g., increased frequency and intensity of heat waves, increased surface temperature of the Pacific Ocean), strengthening of the trade winds in its central Atlantic component (e.g. more intense heat waves in July and August in the Pacific coast).

14. The components of adaptation strategies and national climate change plans and NAPs are based on assessments of current and projected impacts of climate change, including changes in the mean values and associated variability. These strategies and plans, as well as the NAPs, must be based on the conceptual framework developed and widely agreed upon by the scientific community on climate change, which proposes the reduction of climate vulnerability by reducing the climate change threat and improving resilience and adaptive capacity to climate change and related variability. The purpose of the NAP is the reduction of climate vulnerability, through an approach that integrates the social, economic and environmental vulnerability in all priority sectors and systems, including among others, food systems, public health, human settlements, territories of indigenous peoples, coastal and marine areas, forest ecosystems, and other ecosystems and socio-economic sectors (e.g. forestry).

15. Observed and projected impacts of change and climate variability in forestry and forest ecosystems (e.g. fire, pests, diseases, changes in the distribution and abundance of animals, plants and microorganisms, more vigorous carbon cycle, displacement of species and degradation by extreme events) should be considered in the NAP as part of a comprehensive nationwide adaptation strategy, which is founded on the best scientific knowledge and ancestral wisdom on the local climate, and subordinates mitigation objectives to adaptation objectives, to prevent maladaptation. The troika PREP-REDD-plus-MbA is a step backwards

in national efforts to address appropriate and timely climate change, as it weakens and cuts down the national human, technical and institutional capacities that are required for the definition, development and implementation of the whole policy and instrumental framework on climate change.

#### **IV. Demonstrative Territories**

16. The R-PP proposes that the National Strategy on REDD-plus be implemented initially in three areas of high demonstration value, in order to test the effectiveness of REDD-plus options under the troika PREP-REDD-plus-MbA. This would imply, among others, the establishment of a monitoring, reporting and verification (MRV) system, with relevant indicators to assess the effectiveness of these options in terms of the adopted approach. Therefore, the REDD-plus options to be implemented should contribute to adaptation to climate change, and would leave out the adaptation options that do not contribute to mitigation for they are not REDD-plus options. This reflects another of the incongruities and inconsistencies of this approach. Beyond the rhetoric of the PREP-REDD-plus-MbA troika, proposed options for REDD-plus, its effects and related MRV system, have been designed (with serious deficiencies) under the conventional approach of the FCPF and the mechanism agreed in the multilateral process.

17. Moreover, the MARN proposes that the demonstration phase integrate some instruments of government policy currently being implemented or in process of definition, to which it could be incorporated REDD-plus options under the troika PREP-REDD-plus-MbA approach. Such is the case of Family Agriculture Program (FAP in Spanish) of the Ministry of Agriculture and Livestock (MAG in Spanish), the project FOMILENIO II of the Technical Secretariat of the Presidency of the Republic, and MARN national environmental policy, whose status and final version is unknown since it has not been formalized, published or disclosed. The FAP has already identified the geographic areas of influence and these are not located in any demonstration zone selected in R-PP. The degree of participation of indigenous peoples is also not evaluated within the FAP or the relevance of some of the criteria for participation in it (e.g. ownership of the plot), so as to identify the potential contribution of the FAP to the MbA approach. Moreover, the MAG and the National Center for Agricultural and Forestry Technology (CENTA in Spanish) still have not evaluated the impacts of climate change on agriculture under the FAP, and the R-PP did not even present such evaluation as necessary, even though agricultural activities are seriously affected not only by flooding and persistent rains, but also by the increase in average temperatures (maximum and minimum) as well as more frequent droughts and heat waves, increased air humidity, pests and diseases, and reduced soil moisture and population of pollinating bees of ecosystems and crops, among others.

18. Meanwhile, the project FOMILENIO II would implicate large logistical infrastructure on the Salvadoran coast (e.g. auto-routes, airport expansion and establishment of agro-industries and associated resorts and water sports, communications infrastructure, energy and port). It should be noted that despite the imminent approval and initiation of this project, there is still no Strategic Environmental and Social Assessment (SESA) for FOMILENIO II incorporating baseline and future climate change scenarios, particularly as regards the impacts of sea level rise and increased sea surface temperature on the coastal plain, farmland, aquifers,

ecosystems, deltas, aquaculture, fisheries, infrastructure, human settlements, etc. Successive versions of the EFSA have been informally shared to date. They are not based on the requirements that the Environment Act provides and do not incorporate the indigenous peoples' concerns about the impacts of FOMILENIO II on their rights, particularly access, use and enjoyment of their territories, which are well identified and in which they have always done their survival activities since longer than anyone can remember.

19. The demonstration areas were identified and selected on four criteria in order to refine and validate the approaches of the PREP-REDD-plus-MBA troika. In selecting these territories, three "zones" were identified, located in the upper, middle and lower basin of the Lempa River, which is inconsistent with the "landscapes and ecosystems" approach of the PREP. Moreover, in the criteria adopted for selection of zones, the potential for REDD-plus demonstration areas was considered, including agriculture (sugar cane, coffee and basic grains) and ecosystems (wetlands and mangroves). However, although the effects and impacts of climate variability were somehow addressed, such as floods, landslides, lahars and landslides, the inconsistency with the MbA approach should be noted, as current and future manifestations and impacts of climate change and related variability were not considered, nor were assessed the factors of environmental and socio-economic vulnerability in ecosystems and human populations, either in the past or current time and future projections.

20. In the case of the prioritized territory in the Lower Lempa, this was probably selected by the existing natural protected areas (NPA) and the estimated potential REDD-plus (e.g. ecological corridors) according to the PREP approach and conventional REDD-plus, and visibility to the issue of climate variability by addressing the frequent floods and floods observed, and related negative impacts, based on the focus of climate variability. However, it should be noted that the R-PP makes no reference to impacts on the Lower Lempa due to the observed and projected impacts of climate change, such as: sea level rise, increased frequency and intensity of El Niño, more intense mid-summer drought, more frequent and intense heat waves, increased temperatures and humidity, changes in rainfall patterns, changes in sea surface temperature and ocean currents, beach erosion, aquifer salinization, setback of the front line of mangroves, changes in morphology and dynamics of the rivers deltas and coastal areas, and more. Therefore, there is evidence of inconsistency in the approach to adaptation through the PREP-REDD-plus-MbA troika, and that by not considering the impacts of climate change on the demonstrative zones, it could not contribute to adaptation to climate change nor be monitored or evaluated by a MRV system in said demonstrative zone. It should be noted that the main cause of flooding has been the improper management of hydroelectric dam "September 15" upstream, whose effects are exacerbated by weaknesses in the national climate observation and early warning systems. The theme of the right to access, use and enjoyment of the land and its resources by indigenous peoples is not addressed, nor their vulnerability and current and projected impacts on climate change and related variability.

## **V. Institutional arrangements for the REDD-plus preparation stage**

21. Regarding institutional arrangements, unilaterally, MARN has designed a structure for conducting, monitoring and evaluating the implementation process of the R-PP and the preparation of the REDD-plus strategy, which openly excludes participation of different sectors of civil society in decision-making involved in the issue of REDD-plus, especially

indigenous communities, peasants and people who depend on forest resources, relegating them to a level of operative execution in the territory.

22. This structure, product of a non-consulted process that lacks transparency, is based on three hierarchical levels<sup>1</sup> unrelated to each other, which also reflect the hegemony and absolute control of the MARN, blatantly disrespecting one of the safeguards contained in Appendix I to decision 1/CP.16 adopted at the Sixteenth Conference of the Parties to the Climate Change Convention, in relation to the full and effective participation of stakeholders, including indigenous and local communities in matters related to the topic of REDD-plus.

23. The proposed structure is based on a top-down scheme, supported and directed by the National Environmental Management System (SINAMA in Spanish)<sup>2</sup>, which is a structure widely recognized for its ineffectiveness, inefficiency, lack of political support and leadership of the issue of climate change, particularly with respect to the issue of REDD-plus. Within this scheme, the SINAMA, coordinated by the MARN, would serve as the governing body of the REDD-plus Strategy, giving it the responsibility to "serve and follow up on international commitments and the national agenda for mitigation-based adaptation", when in reality the SINAMA has not even been able to fulfill the purpose expressly assigned the Environment Act to: "establish, operate, and maintain the principles, rules, programming, management and coordination of environmental management of the state in public sector institutions and entities," (Art. 6 of the Environment Act).

24. The ineffectiveness of SINAMA clearly shows the incapacity, lack of real interest and political advocacy of the MARN, which as coordinator has not been able to operate the system, so it exists the risk that the implementation of R-PP and the eventual implementation of the REDD-plus Strategy run the same risk as SINAMA by allowing the MARN to be responsible for coordinating the REDD-plus mechanism.

25. The lack of capacity, advocacy, coordination and budget of the SINAMA is recognized in studies by national and international organizations including the World Bank<sup>3</sup>, SACDEL<sup>4</sup>, FUSADES<sup>5</sup> and FUNDE, among others. In this regard, the Foundation for the Development (FUNDE)<sup>6</sup> recognizes that "environmental units do not work properly, which is reflected in their inability to oversee, coordinate and monitor the incorporation of the environmental dimension into policies, programs and projects within their respective institutions", and in the Report No. 35226- SV World Bank states that "the coordination of environmental policy established by the SINAMA has not been able to act as a framework to streamline

---

<sup>1</sup>The proposed levels are: Direction, composed of the National Environmental Management System (SINAMA), coordinated by the Ministry of Environment, Advisory, consisting of a Consultative Council, whose Executive Secretariat will be provided by MARN, and Operative, made up of local actors.

<sup>2</sup> The SINAMA is made up of the Environmental Units of public, autonomous, and municipal institutions.

<sup>3</sup> World Bank (2007). Report 35226 - SV Country Environmental Analysis, Improving Environmental Management to address Trade Liberalization and Infrastructure Expansion. Department for Environmentally and Socially Sustainable Development, Latin America and the Caribbean

<sup>4</sup>SACDEL, 2003. GEO Cities Project: San Salvador, El Salvador.

<sup>5</sup>FUSADES, 2009. How is El Salvador Department of Economic and Social Sciences, SACDEL, 2003. GEO Cities Project: San Salvador, El Salvador.

<sup>6</sup> FUNDE. 2004. Alternatives for Development. May – June 2004. ISSN 1811-430X

environmental policies and priorities or coordinate the tools, budget and environmental resources throughout government agencies."

26. The weakness of SINAMA is also recognized by the MARN since in the R-PP it is considered necessary to revive and strengthen the system, however, there is no reference to the strategies that must be implemented to overcome these weaknesses that have existed since its creation, nor mention of the mechanisms to achieve coordination and direction of the implementation of the R-PP and the REDD-plus Strategy, considering that the SINAMA consists of 262 municipal environmental units scattered throughout the country plus the environmental units of the State Executive Body Portfolios and autonomous institutions, each of which has its own priorities and agendas.

27. In the face of the institutional weakness of SINAMA is expected that management and eventual implementation of the R-PP and REDD-plus Strategy will be exclusively in the hands of the MARN, who to date has not even been able to formulate the National Climate Change Plan, complying with Article 47 of the Environment Act. This reflects the lack of seriousness and importance that the MARN is giving to the international commitments on mitigation and adaptation to effectively address the adverse effects of climate change, which is a contradiction that is considering implementing the REDD-plus Strategy focused on the "Mitigation based on Adaptation" approach.

28. The consultative level of institutions and sectors will be represented by the Advisory Council of the PREP, which according to the R-PP document will allow the expansion and participation of stakeholders and other sectors of civil society and the private sector. However, this instance will only have an advisory role, not be a decision maker, and as with the SINAMA, MARN will be responsible for the Executive Secretariat, so it will be responsible for coordinating the design, organization, preparation and implementation of the "REDD-plus Programme and National Strategy" by the PREP Coordination Unit, again demonstrating the lack of transparency, inclusion and effective participation of other actors and sectors related to REDD-plus.

29. The Territorial Operational Level established is clearly left a marginal role that local actors, including indigenous peoples and peasant communities dependent on forest resources, will play within the institutional structure to manage the implementation of the R-PP and REDD-plus Strategy, assigning a passive role of recipients of decisions that have been taken by another without the free, prior and informed consent of indigenous and peasant communities.

30. There is an inconsistency between the proposed structure and approaching the MbA proposal, as at the operational-territorial level, there are not visible structures associated with the National Disaster Prevention and Relief System (SINAPROC). There are committees at the national, departmental, municipal and local levels, which should develop plans for prevention, and relief which should incorporate adaptation to climate change, based on the changes and impacts of climate change and related variability.

31. The proposed structure identifies three subsystems of the SINAMA, leaving the SINAPROC hidden, which exists by law and is responsible for the prevention and mitigation,

and is currently coordinated by the Secretariat of Vulnerability Affairs of the Presidency of the Republic and has the status of Secretary of State. This deficiency is another reflection of the inconsistencies between the MbA approach and components, processes, components and actions of the eventual REDD-plus Strategy.

32. The formulation without consultation of the institutional arrangements to drive the implementation of the R-PP is a clear evidence of violation of the right of participation of indigenous peoples and to free, prior and informed consent. It is a gross breach of the same standards that FCPF advocates for the establishment of institutional and inter-sectoral arrangements that include the major players involved with well-defined roles and responsibilities, which are essential to provide feasibility and social legitimacy to the processes related to the topic of REDD-plus. Because of this, the structure is unacceptable unless a new proposal is built through a transparent, collective, and multi-sectoral process with new institutional arrangements and an inclusive approach that allows opportunities for participation by all stakeholders.

33. The institutional arrangements for the PREP-REDD-plus Strategy under the MbA approach should be designed within the framework and as an integral part of institutional arrangements for implementation of a Strategy and National Plan on Climate Change and National Adaptation Plan (NAP), to ensure the coherence and consistency required between the components and REDD-plus processes, and the overarching objectives of the Strategy and National Plan on Climate Change.

## **VI. Consultation Process**

34. The greatest weakness of the R-PP document lies in a consultation-lacking process for its preparation. The consultation process has been developed deficiently, excluding key civil society actors who are related to the Land Use, Land Use Change and Forestry (LULUCF) sector, which could be potentially affected by the local impacts of the implementation of REDD-plus, especially indigenous, peasant and forest-dependent communities, as well as civil society organizations working on the issue of climate change, forests and risk management. MARN proposed that the early spread and deepening of earlier agreements will be met through two stages of consultation that have no content, and are described by a series of actions that are isolated and inconsistent with the REDD-plus Strategy. This is an attempt to hide the lack of having held an information sharing and early dialogue with key stakeholders groups, which should have led to the preparation and presentation of the R-PP, since its adoption depends on the procedures, actions and scope achieved during the readiness stage for a REDD-plus Strategy for the country.

35. The R-PP only reports three processes for the early dissemination phase, such as a consultation of the National Environment Policy, the consultation for the design and implementation of the SESA to the design of public investment project in the Marine) Coast (MCC-Millennium Challenge Corporation Funded Program -FOMILENIO II) and the SESA on FAP of MAG and CENTA. None of them has the ingredient of REDD-plus so that it would have been possible infer the procedures, actions and scope of a strategy that would be implemented in the coming years. In fact, the R-PP indicates that these processes only provided results regarding the disclosure of public understanding of sectors on the importance

of climate change and the difference between adaptation and mitigation. This contrasts with the approach taken by the MARN in the R-PP, which ignores the climate change and the associated variability and highlights climate variability, implying serious derivations in terms of awareness of society and the challenges that must be undertaken to address climate change.

36. The R-PP has diffusely presented the "Mesoamerican Regional Dialogue: Forests, Governance and Climate Change", without explicitly referring to it as a consultation process for the R-PP. The reason for this is that this workshop, organized in 2010, for the countries of Central America had the objective of follow up and discussion of concrete proposals for REDD and REDD-plus, without being both a national consultation process for the R-PP. However, it is interesting to note that it was in the context of this dialogue that the MARN representative launched the idea of MbA, being demonstrated, with the same information as the R-PP showed, that this approach (MBA) never came from the three consultation processes listed above, which did not integrate the issue of REDD-plus and occurred in 2011, long after the MARN representative presented the idea during the regional workshop.

37. In the case of the National Environment Policy, the public consultation tool used, called "Public Consultation for Environmental Policy", which was circulated and available to the general public through written media; lacked content on the topic of climate change by not submitting the causes, manifestations, impacts on the country and the region, and response measures (mitigation and adaptation), nor the current state of the institutional, political, legal and international negotiations related to climate change. The text of the consultation is surprisingly focused on water resources management, and definitely does not include the issue of REDD-plus, let alone the fact that the MARN is involved in the FCPF and the development of a proposal (R-PP) for a national REDD-plus Strategy. In any case, if the consultation had eventually been efficient and legitimate, the results have been useful in the preparation of the "National Environmental Policy", (which, by the way, has not yet been drafted). However, it is irrelevant to the stage of early disclosure and consultation of the REDD-plus Strategy because it does not directly address the target groups related to REDD-plus and LULUCF, and for not integrating specific elements of disclosure and consultation on these issues. This does not contradict the fact that the strategy of REDD-plus must arise in the context of environmental policy and climate change in the country, as mentioned above. However, no early spread and consultation process for the R-PP for the national REDD-plus Strategy should masquerade as a process that has its specific objective and dynamics apart.

38. According to the R-PP, the outcome of the consultation exercise on the National Environmental Policy, was to instruct and legitimize the MARN to promote studies on the impact of climate change, by designing action plans to reduce the negative effects on production activities, promote adaptation and mitigation efforts, and perform an adequate water resources planning, designing regulatory frameworks, strategies to promote energy efficiency and water consumption, among others. This finding has no innovation, since legally the MARN is in charge of developing national communications, and to implement efforts that the state must take to meet its commitments to the UNFCCC, which include the development of NAMAs and NAPs. At the time of consulting the policy, there are no studies that are aimed to build such tools. The mandate and legitimization that MARN wins from this consultation, already existed, and has not been fulfilled, leaving the country without the policy framework

and planning on climate change, from which the R-PP and the future REDD-plus Strategy should have come out of.

39. The R-PP, as has been stated, leaves out the readiness stage of involving all relevant sectors of the territories, and the identification and prioritization of needs, demands and initiatives of relevant sectors at territorial development of a REDD-plus Strategy, omitting the identification and prioritization of hazards, risks, and potential local impact of implementing REDD-plus under the troika PREP-REDD-plus-MbA approach. Thus, there is no guarantee that the indigenous, rural, peasant, and forest-dependent communities will not experience a local impact after the implementation of REDD-plus, or that PREP-REDD-plus includes the shelter, support and commitment of these communities in its implementation, thus jeopardizing the effectiveness of the REDD-plus Strategy.

40. The method of consultation for the readiness stage is limited to the organizational structure to implement the REDD-plus Strategy. This implies a top-down relationship, from the SINAMA to the operating level based on the territorial permanent tables, from by the management board of the MARN Coordinating Unit PREP-REDD-plus. In this sense, the R-PP does not come from a designed process, nor is enriched nor strengthened from the bottom up. It can be concluded that the guidelines would come from a SINAMA that enters the process without a policy framework on climate change of which REDD-plus should be a part, and without the experience to coordinate the complex process that it can entail.

41. The local territorial operational level should have been the subject of a transparent, effective and appropriate consultation process prior to the formulation of the R-PP, because this level refers to those actors directly involved in managing the country's natural resources and in land use changes that occur locally. According to the R-PP, this level would be composed of the Local Territorial Working Groups, which would include agricultural and forestry producers organized in the Community Development Associations (ADESCOs), and associations and watershed organizations, and by the officers of the Forestry Development Authority Coalitions, established by the MAG and comprising representatives of forest producers, government entities, local office environment and tourism, community associations and cooperatives. If the R-PP had a basis for adaptation based on the PREP-REDD-plus-MbA troika, the operational territorial level would include committees for prevention and relief of disasters (SINAPROC), which by law already exist or should exist under the leadership of the Secretariat of Vulnerability Affairs of the country, which should make plans to incorporate the subject of adaptation. Added to this lacking, the consultation process was not started from the bottom up and if the organization does not have a structure of horizontal functional relationships, it is very difficult that the preparation for REDD-plus includes the full participation of all actors related to forests and deforestation at the territorial level, as well as to climate change risks and adaptation.

42. In an early distribution phase, there was a proposal to organize a first consultation stage with an aim to deepen early agreements on pilot sites and prioritized territories by the PREP-REDD-plus. The consultation resulted in 12 meetings between representatives and ministerial directions of MARN and MAG, under the FAP. It should be noted that FAP components are oriented to the provision of agricultural inputs, technical assistance and credit support, linking productive liaison with industry and trade, and agricultural innovation to sustain market

competitiveness, plus the addition of climate change plan operations. However, the procedures, actions and scope of REDD-plus arising from the consultation meetings between the MARN and MAG are unclear. First, it is assumed that the climate change approach incorporated in the FAP is the MbA the R-PP has proposed, as the MAG is committed to that 20% of producers or production areas adopt this approach. This takes away, with the adoption of this approach, robustness to the contribution of FAP to eventual REDD-plus strategy. On the other hand, the R-PP does not clarify the link between the agreement reached on the pilot areas that will be common to the General Directorate of Forestry, Watershed and Irrigation of the MAG and the MARN PREP-REDD-plus, with the implementation of the National Forest Strategy, which is in effect and being run by the MAG, and which incorporates the issue of adaptation and mitigation to climate change in detail. In conclusion, it is still not understandable how these agreements are consistent and linked with REDD-plus activities, as they do not specify a level of detail of the actions to be implemented. In addition, the R-PP is not clear in stating whether these inter-ministerial meetings were oriented towards the elaboration of R-PP in order to be implemented after the REDD-plus Strategy for the country, or were received under the FAP and PREP and have been reported as consultation activities for REDD-plus due to a rush to develop the R-PP.

43. Additionally and according to the R-PP, the first stage of consultation also included consultation by SESA of the design of a public investment project in the Marine Coast (MCC-FOMILENIO II), in which has engaged the Technical Secretariat of the Presidency, the Ministry of Public Works, Transportation, Housing and Urban Development (MOPTVDU, in Spanish) and MAG, to bring a joint process of dialogue and awareness among policy makers about the dynamics of ecosystems and natural resource degradation of the FCM, and the limitations and opportunities this presents for an economic development plan considering the restoration and maintenance of them. Once again, the climate change component is not seen in the project FOMILENIO II, and the issue of REDD-plus is again subordinated to the theme of restoration, without specific details about the procedures, actions and achievements that would have to sustain the R-PP, as if its purpose was precisely to implement REDD-plus in the areas of scope of FOMILENIO II. The convergence between FOMILENIO II and PREP is questionable, even if the MbA approach is used as a buffer, because the impacts of climate change on the coastal zone are not considered based on climate, socio-economic and environmental scenarios, from which to determine actions for a full adaptation of natural ecosystems, agro-ecosystems and the human settlements linked to them, and related to different sectors of the country (eg. tourism, agriculture, aquaculture, water resources, transportation, health, energy, infrastructure).

44. Regarding the first stage of consultation on a non-governmental level, the MARN states that it has participated in 3 workshops and 15 meetings, and helped promote the formation of the Permanent Working Group of the Social Actors of the Lower Lempa Region during the second half of 2011 around the central themes of PREP. It is argued that a subset of this group will be the territorial counterpart of PREP-REDD-plus. However, the R-PP is unclear whether this group has been properly informed about REDD-plus actions, and whether it includes the population level that could be being directly affected by PREP-REDD-plus, including indigenous peoples of the coastal zone, who should be participating in this space. Therefore, it does not express nor expose the priorities, needs and barriers that would exist on a local level to implement REDD-plus activities during the preparation stage. Meanwhile, the planned

workshops with the sectors considered most interested in or who may be potentially affected by the actions preparatory or implementation of a plan PREP-REDD-plus, including organizations of civil society, have been programmed in an undefined calendar in the R-PP. At the date of delivery of the first draft report of the R-PP and the development of these observations to the document, invitations and confirmations for these workshops have not been conducted, as they were planned for the months of April and May 2012, according to data from the R-PP. Finally the workshops held to constitute the core of the three pilot areas in the territorial upper, middle and lower Lempa River Basin, only provided agreements related to the MbA approach. Future participation in planning workshops and training for PREP-REDD-plus, lacks an agenda that has been disclosed, discussed and agreed to the REDD-plus actions that would be implemented, for possible expression patterns, actions and achievements that should have been detailed in the R-PP in a clear and specific way.

45. The R-PP tries to make the existence of indigenous peoples in El Salvador invisible, arguing a discussion of experts at social scientists, and between public officials and politicians, about the difficulty of identifying the indigenous peoples or communities in the country. The R-PP does not recognize that this form of invisibility has materialized from actions taken by the government in collecting and processing demographic information, hastily assuming an ethnic homogeneity in El Salvador, which excludes both peoples as people of African descent. On the contrary, it explains this invisibility only in terms of a dramatic and almost complete level of indigenous dispossession of their lands of origin. This causes a threatening effect to the inclusion of indigenous peoples of the country in the REDD-plus Strategy by disconnecting them from the access, use, and management of land and natural resources, and to ignore the importance that indigenous people forestry and agricultural practices based on their worldview and models of common well-being.

46. The position of the R-PP continues to define the indigenous population of the country as a very particular community, for being "urbanized" and exposed to the changes brought about by economic modernization in recent decades. Although the previous position lacks technical-scientific foundation and is another way of making the population invisible, is a fact that under the "Indigenous Rights to Ancestral Lands and Natural Resources" (IACHR, 2010) framework, occupation of a territory by an indigenous community or people is not restricted to the core of their homes, but also includes integrally the territory, i.e. a physical area formed by a group of houses, natural resources, plantations and their environment, linked where possible to their cultural tradition, including land used for agriculture, hunting, fishing, gathering, transportation, culture and other purposes. In this situation the states must take concrete steps for the recognition of the right to communal property of indigenous and tribal peoples goes from being an abstract value to a legal material right with physical boundaries. The R-PP excludes and devalues these considerations especially to the safeguards adopted on REDD-plus in the multilateral process of the UNFCCC, to which El Salvador adopted in the Cancun Agreement and the Durban Platform.

47. Paradoxically, the R-PP leaves out the MbA approach in the segment devoted to "Indigenous Peoples: the particular case of El Salvador," when on the contrary, a well-founded proposal for adjustment should incorporate ancestral knowledge and local people from Indigenous Peoples, especially for the agriculture, forestry and water resources, which is what the PREP is based in.

48. The R-PP restricts the legal and institutional framework of indigenous peoples, arguing that the Constitution of 1983 (still in effect) does not recognize ethnic and cultural diversity of the nation, and enforced by single reference to Article 62, which speaking of native languages , which are part of cultural heritage and should be preserved, spread, and respected. The R-PP disrespects: (i) The International Indigenous Rights Framework, including the Convention (107) and Recommendation on Indigenous and Tribal Populations, 1957 (ILO), the Universal Declaration of Human Rights (1948); the International Covenant on Economic, Social and Cultural Rights (1976), the International Covenant on Civil and Political Rights (1976), the Convention (169) concerning Indigenous and Tribal Peoples, 1989 (ILO), the UN Declaration on the Rights Indigenous Peoples (2007), Resolution on the Rights of Indigenous and Tribal Peoples to their Ancestral Lands and Natural Resources (2010) IACHR-OAS, and the Report on the Situation of Indigenous Peoples in the World (2010) (Secretary of the Permanent Forum of indigenous Peoples in the UN), and (ii) the UN Declaration on Indigenous People's Rights (2007), which stipulates in its article 3 that indigenous peoples have the right to self-determination freely determine their political status and the pursuit of their economic, social and cultural development; in its Article 8, that indigenous peoples and individuals have the right to their culture is not necessarily subject to assimilation or destruction; that states shall provide effective mechanisms for prevention or reversal of any action to affect the integrity as a people different cultural values or cultural identities, and any action to usurp their lands, territories or resources; in its Article 10, that indigenous peoples should not be dispossessed of their lands or territories, and will not be relocated without their free, prior and informed consent, and then to agree on fair compensation, and the possibility of return, and in its Article 26, which indigenous peoples have the right to lands, territories and resources they have traditionally owned, occupied, used or acquired, that indigenous peoples have the right to own, use, develop and control the lands, territories and resources they possess because of traditional ownership or acquisition, and that States shall give legal recognition and provide protection to these lands, territories and resources, with due respect for the customs, traditions and systems of land tenure specifically of indigenous peoples.

49. The R-PP makes almost no mention of the issue of carbon offset mechanism that the FCPF involves, opening space for the process of preparation, incurred in a rigged consultation with the population that will be more seriously affected by the implementation of REDD-plus. The R-PP refers to the subject evasively, and does so only three times: first, when it says that the officers of Forest Development Coalition are forums for discussion and analysis of forest sector development, including the issue and matters relating to the incentive program and environmental compensation mechanisms; second, when it mentions Phase II (Policies, measures and program adjustments) determining the technical and legal aspects regarding the rights of carbon, based on studies made in Phase I, and third, with mention that in stage III of the stage of preparation for REDD-plus Strategy, the legal and regulatory frameworks designed and the institutional arrangements would be consolidated, and the design of appropriate instruments for the promotion, regulation, incentive and stock compensation PREP-REDD-plus would be done on a national scale.

The R-PP eliminates the need and right of the population, especially indigenous, peasant, and forest-dependent groups; to develop experiences for economic compensation for the capture or reduction of emissions from deforestation and degradation forests, with timely and

transparent notification about how benefits would be distributed and delivered, what is the source of resources, who handles the funds, and how to determine the ownership of carbon in the light of the subject of land tenure, and also on the local impacts of a possible REDD-plus Strategy, which could include reducing the sovereignty of peoples and communities over their territories; greater restrictions on access, use, enjoyment and ownership of lands, territories and goods from forests, conflicts and tensions on the rights of land tenure, and services that forests provide; evictions of communities that have lived in these territories since ancient times; deterioration and loss of local identity, history and culture of the people: disadvantaged participation of rural human communities in the value chain of compensatory mechanisms; shifting the drivers of deforestation and degradation to the most vulnerable areas, and the possibility of a change of natural forests to tree plantations, agro-ecosystems or secondary forests. Likewise, the R-PP undermines the importance of informing the public about the global impacts of the mechanisms of carbon compensation, including those who are involved in the mechanism of the FCPF, and that have to do with the failure to contribute to a real, additional and permanent mitigation of climate change.

## **VII. Activities to be implemented**

50. The activities that REDD-plus and R-PP propose are relegated and forced to converge with the axes of action of PREP<sup>7</sup>, without the underlying scientific methodology and financing required, assuming freely that there is a de facto congruence between PREP activities<sup>8</sup> and REDD-plus activities, which would be aimed at preventing deforestation, reverse forest degradation, and increase and enhance carbon stocks. In opposition to this, the R-PP does not present any analysis to reveal and report forest systems (composition, structure and function) and specific ecological processes to be established in the field by the PREP, in consideration of the particularities, circumstances, requirements and technical limitations, territorial, socio-economic and environmental impacts of each site and each user, making baseless and showing just how poor the fact that there is a direct, unconditional and stronger congruence among REDD-plus activities and lines of action and activities being implemented by the PREP, and does not promote or endorse the complementarily or compatibility of REDD measures with the objectives of PREP. Thus, the implementation of the REDD-plus Strategy in the country alienate the level of outcomes and actions to comply with agreements arduously negotiated and circumscribed around REDD-plus under the UNFCCC negotiations, thereby risking their relevance in an effective mitigation of climate change.

51. The PREP has emerged separately from the development of policies, strategies and plans for the country's forests and was released suddenly and with many restrictions among the population, as a proposal isolated from the process of climate change planning and the current National Forest Strategy that is implemented by MAG. Links with the FAP, FOMILENIO II and National Environmental Policy are apparent, because there are weak

---

<sup>7</sup> (1) expand agro-forestry and promote the transition to agriculture resilient to climate change, biodiverse and reducing CO<sub>2</sub> emissions, (2) existing mangrove conservation and restoration of degraded ecosystems and other support, (3) highly degraded river restoration, with gallery forests and revegetation of coastal landscapes, (4) promotion of green infrastructure retention, crop and water management and groundwater recharge, (5) applied research, training and development, and (6) institutional strengthening local and national capacity building

<sup>8</sup> Avoiding deforestation of small remnants of forest and agroforestry (shade-grown coffee), expand the gallery forests and natural regeneration of forests, biological corridors and promote agroforestry in slopes and the massive use of soil and water conservation.

correlation of content and type of territory between these initiatives and the PREP, and because it is presumed that the binding approach among them has been done opportunistically for the preparation and presentation of the R-PP. In fact, PREP presents inconsistencies and conceptual weaknesses in trying to promote and facilitate the restoration of ecosystems and landscapes, with goals of rehabilitation, i.e. only to recover the system functions without necessarily rebuilding the original structure, and therefore without necessarily establishing changes to increase and improve the forest carbon stock. Similarly, the restoration could be geared to non-forest ecosystems, separating in this case the objectives and activities of REDD-plus. It is therefore unpredictable and risky for the country, how REDD-plus Strategy, part of the binomial PREP-REDD-plus, will fit into policies and national and local initiatives in the sector LULUCF in terms of mitigation, and the sectors forestry, agriculture, biodiversity and water resources in terms of adaptation.

52. The activities to be implemented according to the vision and concept of R-PP referred to as MbA, are not made or circumscribed, and are not intended nor entitled under a policy framework for adaptation to climate change. This policy framework is nonexistent in the country and should include at least one Strategy and National Plan of Adaptation to Climate Change, which should have been prepared under MARN management and leadership based on the best scientific and methodological knowledge adopted by the IPCC and the countries of the UNFCCC and under the legitimization and adoption of the civil society with respect to different socio-economic sectors vulnerable to climate change in Salvadoran society. Therefore, the activities to be implemented by the proposed PREP-REDD-plusMbA troika lack of scientific technical basis, social legitimacy and technical, financial and socio-economic feasibility, to demonstrate in advance that will promote successful adaptation to the climate change impacts and appropriate management of risk and to ensure that systems and processes to be established by such activities will occur on the ground without the risk of reversal by the same impacts of climate change and related variability.

53. The activities to be implemented as proposed by R-PP do not provide for an appropriate approach for any of the following: (a) the direct and indirect causes of deforestation and forest degradation in the country, (b) questions of land tenure, including indigenous territories, (c) forest governance, (d) gender considerations and (e) the seven safeguards agreed in the Durban Platform. Although these aspects are mentioned briefly in different parts of the document, not specified or underlying the way the REDD-plus strategy will be followed, in consideration of: (I) the circumstances and capacities of the country, (ii) the full and effective participation of population and stakeholders, particularly indigenous peoples and peasant communities dependent on forest resources, and committees for disaster prevention and relief, and (iii) the effective incorporation of these aspects in all phases of application REDD-plus. The above shortcomings have been evidenced with the exclusion of civil society from the consultation process of the development and validation of the R-PP, and postpone further even jeopardizing the fulfillment of the obligations acquired by El Salvador as part of the UNFCCC, after adoption of the Agreement Cancun Package in 2010 and Durban in 2011<sup>9</sup>.

54. The R-PP mentions that the goal of the program PREP-REDD-plus is to "promote and facilitate the restoration of ecosystems and rural landscapes as a mechanism to secure the

---

<sup>9</sup> For this case, specifically paragraphs 69, 72 and 73 of the 1/CP.16 and paragraphs 1 and 2 of the 12/CP.17.

basic ecosystem services, conservation of biodiversity and reduction of social and environmental risk as a way to adapt to the impacts of climate change, particularly climate variability". Both the goal and objectives and options of the PREP-REDD-plus Strategy fail to focus only on actions aimed at the conservation, management and increase in carbon stocks, let alone combat the direct causes and underlying deforestation and forest degradation, so that while one hand is carrying out activities to mitigate emissions of GHG emissions, mainly CO<sub>2</sub> based on the restoration of ecosystems and landscapes, the other will continue and promote activities that generate GHG emissions, such as indiscriminate legal and illegal logging of forests, the timber market, the unsustainable extraction of fuel wood and timber, expansion of the agricultural frontier, breach of forest law and its ineffective application, among others.

55. The organization of the activities of PREP in the sense of meeting the highly vulnerable areas to erosion, sedimentation, pollution and flooding, beyond the territories with remnants of natural forests, (plus the fact that the definition of forest should include agroforestry systems not coffee plantations, that the PREP seeks to establish in existing agricultural parcels), add to the concern that the definition of "forest" that the country adopts will have to be around the minimum values of minimum area of land, crown cover and minimum height. A loose definition implies that a deforested area will be considered as such until its thresholds are below the parameters of the forest definition of the country and is considered a reforested area when it achieves those values. The R-PP does not explain how this can cause the conversion of natural forests and the leakage of emissions at national level, nor how this will be accounted with regards to emission reductions by REDD-plus activities in the country, compared to a baseline reference level and based on the values of the LULUCF sector in the Greenhouse Gases National Inventories (INGEI). This has serious implications for the real mitigation of climate change through REDD-plus activities, and the transparency and effectiveness of MRV actions.

### **VIII. Monitoring, Reporting and Verification (MRV) System**

56. The design and implementation of the MRV System is one of the most important components of the REDD-plus Strategy, as it is intended to monitor emission reductions from deforestation and forest degradation, and the increase of carbon stocks due to conservation and sustainable management of forests. In addition, through the MRV system, the multiple social, economic and environmental benefits and compliance of safeguards and governance will be assessed as achieved with the implementation of REDD-plus actions. On the other hand, considering the focus of MbA and its link with the PREP, the MRV system should be reflected in all components and processes that approach, and fully incorporate climate change and the associated variability and adaptation, and reflect the approach to ecosystems and natural landscapes, all of which should be subject to monitoring, reporting, and verification.

57. Despite the importance of this issue, Component 4 of the R-PP, which refers to the design of a monitoring and reporting system, is disconnected from the other components of the document, especially the components 2a, 2b, 2d and 3, addressing past trends of deforestation, as well as the performance of REDD-plus strategies, social and environmental impacts and estimated levels of references, among other aspects related to the objectives for MRV.

58. Also, the MRV system lacks a clear objective, which refers only to "design and implement a standardized national monitoring system based on the integration of satellite images and information collected on permanent sampling sites (sampling plots), "making it clear once again the inconsistency and disconnection from the MbA approach because it does not include the monitoring of impacts to be achieved in the field of adaptation and mitigation. In the case of adaptation impacts, there is no way it could be evaluated with satellite images and plots. This lack of clarity is a result of the fact that the MARN does not have a solid conceptual framework on the MbA approach, which results in distortion of the indicators and expected results and a diffuse MRV system.

59. The basic elements of a system under MRV REDD-plus approach, as adopted at COP-16 in Cancun, are:

- An assessment of historical rates of deforestation and an updated and transparent forest assessment, which includes the measurement of parameters such as biomass, forest carbon and biodiversity.
- Setting of national level forest emissions baseline and/or national level forest baseline, including, for example, an assessment of historical rates of deforestation and a current forest evaluation. The sub-national level forest emissions baseline and/or sub-national level forest baseline can be adopted temporarily.
- A national REDD-plus baseline generated in a participatory manner, including indigenous peoples and afro-descents, charting the historical areas of deforestation and also to project future rates of deforestation in these areas, the baseline must be adjusted based on the analysis of available information and according to the scope of each country, this baseline should be open to independent verification system to ensure that follows the same methodology proposed in order to compare results.
- A sub-system of information on the approach and respect of the seven social and environmental safeguards agreed upon in COP16 in Cancun, which is an integral part of a national MRV system. The safeguard information sub-system includes elements that are environmental and socio-political, such as biodiversity, governance, poverty reduction, rural means of survival, including respect for international indigenous rights, with a broad consultation process that is free, prior and informed, as well as the identification of barriers to the implementation of these safeguards.
- An assessment to determine the factors that cause direct and indirect emissions from deforestation and forest degradation, and proposed measures to eradicate them, such as regional or international illegal trade of timber, expansion of multinational corporations in the logging industry, corruption of institutions with government mandates, etc.

In addition, this component has been poorly developed containing a series of gaps, omissions and inconsistencies, some of which are detailed below.

#### **a. Monitoring, reporting and verification of REDD-plus**

60. Component 4 mentions that it will do follow-up on only two REDD-plus activities: the decrease in emissions and increases in carbon stocks, but don't include in the MRV system the management and conservation of forests, which contradicts the statement in Component 3 (p. 80), which states that "the results of the five REDD-plus activities in El Salvador will be evaluated and monitored."

61. In the monitoring methodology section, it describes the method for accounting for carbon stock in forests and agro-forestry systems today, but makes no reference to the procedures to be applied to measure and determine the changes (increase or decrease) on the surface of carbon stocks. Likewise, it does not specify how to monitor forest degradation.

62. It is unclear if the MRV system will start at national or sub-national level, and if carried out at the sub-national level it would be intended to carry on a national scale. Also, it is not explained what level (Tier) of certainty be used for estimating carbon pools and other parameters to be evaluated.

63. Moreover, it is mentioned that for the data collection on a national level, the national forest inventories data will be used, but in the country, there isn't a forest inventory. On the other hand, it does not explain how it is overcome information gaps to develop baseline scenarios and projections of GHG emissions from deforestation and forest degradation, when in the R-PP document it says that it only has the reliable information of ecosystem maps of 2000 and 2010, because they were made with the same methodology.

64. As for leaks, it does not explain how they will be monitored during the implementation of REDD-plus activities in the three proposed demonstration zones and pilot sites, in such a way as to follow up on the possible displacement of GHG emissions product of deforestation and forest degradation to other areas of the country, including in border areas.

65. It is also not discussed how to produce an independent monitoring of REDD, involving civil society and stakeholders, as required by the components 4b and 2c. This should be an essential building block in the structure for monitoring REDD-plus governance, enabling credibility in the results of monitoring, so as to ensure transparency and to publicly point out the weaknesses, inefficiencies and ineffectiveness of the MRV system.

#### **b. Additional benefits of REDD-plus MRV**

66. Although the R-PP recognizes that monitoring of the multiple benefits of REDD-plus activities is an important component of the National REDD-plus Strategy of El Salvador, it is not considered how a number of co-benefits that according to the R-PP will be generated by implementing REDD-plus activities, will be monitored, reported and verified. It only presents a preliminary proposal for monitoring the biodiversity component, given that according to the technical and financial capabilities of the country, is too ambitious (in terms of levels of specificity of attributes) to evaluate: structure, composition and function *at all organizational levels which addresses biodiversity*. We believe that the proposed Biodiversity monitoring component implicates a waste of human capacity and technical and financial resources by requiring monitoring in such detail and specificity of this co-benefit, so we explicitly reject this proposal.

67. Furthermore, we demonstrate the little interest and importance that MARN has given to the potential impacts that the REDD-plus Strategy can have in social, economic and environmental spheres, as it is not addressed in the MRV how it will monitor relevant issues as a means of survival of rural indigenous communities, peasant and other communities who are dependent on forests, land tenure, levels of governance, changes in forest policy and legislation, of which no mention is made clear in the proposed R-PP, although the National Forest Strategy is in place and is coordinated by the MAG.

68. Also, the MRV system proposed does not refer to how additional benefits will be monitored, reported and verified. According to the document they will be generated with the implementation of PREP-REDD-plus-MbA, which needs to be addressed to assess its effectiveness. These are:

- Conservation and restoration of forest ecosystems and sustainable forest management, consistent with the Strategic Plan for Biodiversity of the Convention on Biological Diversity and the AICHI Goals.
- Improving the resilience of ecosystems through conservation of biodiversity and increasing carbon reserves.
- Ecosystem Restoration through promoting change in farming practices on agricultural land located on slopes that have influence on other key forest ecosystems.
- Restoration of ecosystem services, to help reduce runoff and prevent loss of nutrients, and generate greater resilience to extreme weather events, resulting in enhanced production.
- Changes in farming and livestock systems, reducing dependency on the use of petrochemicals.

### **c. MRV of social and environmental safeguards**

69. Although the World Bank's FCPF does not require governments to incorporate properly and as adopted in the Durban Platform (Appendix I to decision1/CP.16), the seven safeguards for the design and implementation strategies and REDD-plus, governments have commitments and obligations under international law derived from the multilateral process of the UNFCCC, and therefore beyond the requirements of the FCPF, the following safeguards should be incorporated into the strategies and REDD-plus options:

- REDD-plus is consistent with or complements the National Forest Plans and relevant international conventions.
- Structures for stewardship or governance of national forests that are effective and transparent and respect the laws and national sovereignty. Governance should be approached from six dimensions: (a) accountability, (b) political stability and violence

reduction, (c) government effectiveness, (d) regulatory quality, (e) rule of law and (f) control of corruption.

- Respect for the knowledge and rights of indigenous people, and consider the international obligations of the issue.
- Full and effective participation of all stakeholders, particularly indigenous and local communities.
- REDD-plus is consistent and promotes the conservation of natural forests, biodiversity, ecosystem services, and social and environmental benefits. Considering the need for sustainable means of livelihood of indigenous peoples and local communities, and their interdependence with forests.
- REDD-plus includes actions to address the risks of reversal of REDD-plus activities.
- REDD-plus includes actions to reduce displacement of emissions (leaks).

70. In addition, governments should establish a system for providing information on steps to take so that the seven safeguards adopted are addressed and respected during the implementation of REDD-plus, in the framework of national sovereignty. During the development phase of the R-PP should have identified the following: the information required to feed the MRV system for enforcement of the seven safeguards, the sources of such information and the main barriers to the implementation of these safeguards, all of which was not done.

71. The MRV system will contribute to national adaptation needs of the countries, and shall supply information to the NAPs for purposes of monitoring compliance with the safeguards relating to REDD-plus. They should be consistent with the ultimate objective of the Framework Convention on Climate Change, and therefore should not lead to increased vulnerability or climate maladaptation. This linked especially to forest areas avoiding the degradation and the advance of the agricultural frontier, but at the same time ensuring the means of survival for rural and indigenous people and their rights for control over land and resources. The system must include the current scenario in the management of agriculture and other land uses to define early actions that would curb the impacts of forest degradation, with a baseline scenario identified the territories of the peoples and indigenous communities, including legal status.

72. According to the standards of the FCPF, the monitoring system should also include, inter alia, the safeguarding indicators (taking into account the links with the component 2b (REDD-plus) component 2c (under implementation), component 2d (social and environmental impacts) and the text on safeguards-/CP.16COP. However, in the R-PP there is no reference to "monitoring" of social and environmental safeguards and environmental and forest governance. There is only allusion to monitoring carbon and biodiversity. The only mention of safeguards is in the 2d component associated with the SESA, which states that eight safeguards "possibly" will be activated, among which are International Waters and Projects

Areas of Dispute not including more information on the criteria taken into account to select, let alone how to how to be monitored, reported and verified compliance.

73. According to the above approach, the proposed monitoring system is incomplete and does not provide adequate information for the implementation and evaluation of environmental and social impacts of REDD-plus with respect to compliance or disregard of the safeguards of the World Bank or those adopted at COP 16, which oversee structures to maintain effective and transparent national forest governance, as well as full and effective participation of all stakeholders, particularly indigenous and local communities.

**d. MRV of the PREP -REDD-plus approach -"Mitigation based on Adaptation"**

74. One would hope that the PREP-REDD-plus-MbA troika would consider a comprehensive and detailed approach to implementing this approaches well as to assess its effectiveness. Although the approach is mentioned repeatedly throughout the document of the R-PP, the monitoring component does not mention what kind of mechanisms will be used to monitor the impact of actions both in the field of mitigation as adaptation. It also does not explain how the MbA approach determines the MRV system designing terms of objectives, outputs, indicators, information sources, etc.

75. On the other hand, does not consider how the eight options proposed as REDD-plus will be monitored, reported, and verified, as summarized in Table13 of document R-PP, or who participates in the process, indicating time, resources, information management, etc.