



REDD+ AND CORRUPTION RISKS FOR AFRICA'S FORESTS

Case Studies From Cameroon, Ghana, Zambia And Zimbabwe

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(based on country reports produced by TI Cameroon,
Ghana Integrity Initiative, TI Zambia and TI Zimbabwe)

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ISBN: 978-3-96076-030-6

Printed on 100% recycled paper.

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ABBREVIATIONS

COP: Conference of the Parties

CRA: Corruption Risk Assessment

CSO: Civil Society Organisation

FAO: Food and Agriculture Organization of the United Nations

FCPF: The World Bank Forest Carbon Partnership Facility

FLEGT: Forest Law Enforcement, Governance and Trade Action Plan

MRV: Monitoring, Reporting and Verifying

NGO: Non-governmental organisation

RDC: Rural District Council

REDD+: Reducing Emissions from Deforestation and Forest Degradation in developing countries, and the role of conservation, sustainable management of forests, and enhancement of forest carbon stocks in developing countries

R-PP: Readiness Preparation Proposal

SIS: Safeguard Information System

U4: U4 Anti-Corruption Resource Centre

UNFCCC: United Nations Framework Convention on Climate Change



EXECUTIVE SUMMARY

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The link between deforestation and corruption – which Transparency International defines as “the abuse of entrusted power for private gain” – has been almost universally recognised. Corruption within and around the forest sector is considered to undermine the framing, implementation and subsequent monitoring of policies aimed at conserving forest cover.

In addition to causing environmental damage and undermining state efforts to manage forests in a sustainable manner, high levels of structural corruption act as a deterrent to foreign investment: firms are often reluctant to invest in risky or uncertain business environments. Donors can similarly hold back development or climate finance due to concerns that funds will not go to their intended projects. Therefore, in many countries, corruption threatens international initiatives to protect and conserve forests, while also jeopardising development and poverty alleviation goals.

In recent years, as Reducing Emissions from Deforestation and Forest Degradation (REDD+) discussions progressed within the United Nations Framework Convention on Climate Change (UNFCCC), it was recognised that the implementation of REDD+ could provide environmental and social benefits. But experts also identified significant risks, including depletion of biodiversity, involuntary displacement and other human rights violations, as well as corruption.

Recognising the urgency for for developing country's governments to understand and address corruption risks, Transparency International has developed a manual to help identify such risks and develop approaches to address them as part of national REDD+ programmes – from action plans and strategies to implementation – and other forest carbon projects.¹

The following report provides the summarised findings of corruption risk assessments (CRAs) in four African countries: Cameroon, Ghana, Zambia and Zimbabwe. In each CRA, stakeholders, who include representatives from governments, academia, the judiciary, non-governmental organisations (NGOs), the media, international organisations and private sector, were selected to participate based on their experience in the forest sector.

In each country, CRA participants engaged in focus group discussions and interviews. Based on their knowledge and experience, they first identified potential corruption risks linked to a number of REDD+-related activities and thematic areas. They then considered the likelihood of those risks occurring and the impact they may have if they finally do. The most severe risks – those with greatest likelihood of occurring and with greatest potential impact – were then considered, in order to formulate corresponding recommendations.

The findings outlined in this report have been organised into several “pillars” of good governance. These reflect the top risk categories identified by participants. Each category, if dealt with effectively, can mitigate corruption risks arising from national REDD+ programmes. However, if not adequately addressed, the risks of corruption from REDD+ are likely to be exacerbated, jeopardising its objectives. The pillars are:

- adequate access to information
- full and effective participation
- security of tenure
- fair allocation and disbursement of funds
- access to justice
- monitoring, reporting and verifying (MRV) carbon and monitoring systems

While these countries are diverse and excessive generalisations should be avoided, they (together with other African countries) share a number of common governance challenges, including:

- lack of technical and institutional capacities,
- problems with the demarcation of the forest estate
- political and policy contradictions between REDD-goals and other development aims
- difficulty in ensuring effective coordination and cooperation across sectors.

Many recommendations have emerged from this research. Four apply across all four countries. Transparency International will aim to support its national chapters to promote these recommendations, and will seek coalitions with other stakeholders from civil society, government, donors and multilateral organisations to introduce reforms and help protect REDD+ from corruption.

RECOMMENDATION 1:

DEVELOP A REDD+ TRANSPARENCY STANDARD TO IMPROVE ACCESS TO INFORMATION

In all four countries the CRAs found that access to information was lacking throughout the REDD+ preparations. While specific information gaps differ across countries, the common trend is the need for more transparency. To help address this issue, a “transparency standard” for REDD+ should be developed. This standard would outline the types of information that should be made available in any REDD+ programme and how the information should be made available (online in machine-readable formats, offline and accessible for rural communities, regularly updated, etc.). This “transparency standard” could also include references to international best practices related to transparency.

RECOMMENDATION 2:

STRENGTHEN PARTICIPATION IN THE REDD+ PROCESS BY TARGETING THOSE WHO ARE UNDER-REPRESENTED

Lack of knowledge and capacity to participate in REDD+ processes are common problems in all four countries. Although some stakeholders, for example civil society organisations (CSOs) and academia, have seen their capacities and degree of participation in REDD+ increase, this is not the case for other actors whose involvement is critical to ensuring the success of REDD+. These include local communities, district-level administrations, parliamentarians, law enforcement and anti-corruption entities. Greater efforts must be made to raise awareness and build the capacity of stakeholders so these can play their distinct roles and bring their expertise to bear.

One option recommended to increase the capacities and participation of local communities is the establishment of community hearings specifically designed to inform and elicit feedback and input from local communities.

Furthermore, greater effort must be made to ensure law enforcement entities and other oversight bodies play their roles to ensure that REDD+ lives up to its potential.

RECOMMENDATION 3:

PRIORITISE THE DEVELOPMENT OF STRONG, INDEPENDENT DISPUTE-RESOLUTION MECHANISMS FOR REDD+ WITH THE CAPACITY TO IDENTIFY AND DEAL WITH CORRUPTION-RELATED GRIEVANCES

REDD+ has the potential to create disputes, conflicts and complaints among the various actors hoping to benefit from it. This was highlighted as a significant challenge in all CRA countries. As a matter of urgency, it is essential that authorities in REDD+ countries set up transparent, accountable, effective and efficient dispute-redress mechanisms as envisaged in the REDD+ safeguards. These mechanisms are intended to complement, not replace, formal legal channels for managing grievances. In order to be most effective, these mechanisms need to be established at all administrative levels. They could build upon existing, traditional dispute-resolution arrangements, provided these are independent and transparent. In addition to taking steps to accelerate the operationalisation of these mechanisms, it is recommended that REDD+ countries establish channels for victims or witnesses of fraud and corruption to seek remedial action and/or prosecution for wrongdoing, as well as protection provisions and mechanisms for whistleblowers.

RECOMMENDATION 4:

IMPROVE SYNERGIES AND EFFECTIVE COORDINATION BETWEEN RELEVANT POLICIES AND INITIATIVES IN THE FOREST SECTOR

With the number of initiatives to address deforestation and illegal logging on the increase, there is a greater need for synergies and coordination. An example of this is the EU's Forest Law Enforcement Governance and Trade (FLEGT) initiative. National REDD+ processes should continue to engage with the FLEGT processes, where present, in order to benefit from the successes and lessons learned, including institutionalising information-sharing and learning. There is also a need to foster better coordination between sectors and government agencies beyond the forest sector. In particular, closer cooperation is needed between REDD+ institutions and organisations that focus on improving governance and oversight, such as parliamentarians and anti-corruption agencies. Best practice has been to establish a multi-stakeholder body, sometimes focusing on integrity issues.



INTRODUCTION

INTRODUCTION

CORRUPTION AS A GOVERNANCE CHALLENGE IN THE FOREST SECTOR

Transparency International defines corruption as “the abuse of entrusted power for private gain”. This definition makes it clear that corruption goes beyond the public sector. Within this definition, two sub-types of corruption are identified, namely economic corruption, which involves the exchange of tangible goods (cash, official positions, material goods), and social corruption, which generally involves the exchange of intangibles (such as favours, social status or power).

The link between corruption and deforestation and forest degradation has been almost universally recognised, including by the Food and Agriculture Organization of the United Nations (FAO);² corruption within the forest sector is considered to undermine the framing, implementation and subsequent monitoring of policies aimed at conserving forest cover.³ Illegal logging alone, which can contribute hugely to degradation and deforestation, is estimated to be worth between US\$30 and US\$100 billion, or 10–30 per cent of the global timber trade.⁴ Corruption has been flagged as one of the primary reasons why illegal logging continues in many parts of the world, and why environmental and socially damaging activities by mining, agriculture and timber companies operating in tropical forest regions are allowed to continue with impunity.⁵

Corruption can be high-level, as politicians are able to influence the granting of land concessions and logging permits, or even influence authorities responsible for scrutinising and policing illegal behaviour. It can also be witnessed at low levels, as officers responsible for forest law enforcement turn a blind eye to illegal logging or transport in exchange for compensation.⁶ In addition to causing environmental damage and undermining state efforts to manage forests sustainably, high levels of structural corruption act as a deterrent to foreign investment, as firms are often reluctant to invest in risky or uncertain business environments. Donors can similarly hold back development finance due to concerns that funds will not go to their intended projects. Corruption therefore constitutes a risk to the successful implementation of international initiatives intended to protect and conserve forests, while also jeopardising development goals and poverty alleviation in many countries.

REDD+: INTERNATIONAL CONTEXT

REDD+ is a “forest-based climate change mitigation approach for developing countries under the UNFCCC” that aims to contribute to the reduction of carbon emissions through five activities: reducing deforestation; reducing forest degradation; conservation; sustainable management of forests; and the enhancement of forest carbon stocks in developing countries.⁷

REDD+ originated as an idea at the 11th Conference of the Parties (COP 11) to the UNFCCC in Montreal, Canada. The proposal was to reduce global greenhouse gas emissions by providing incentives to protect and conserve forests.⁸ After 10 years of UNFCCC negotiations, the rules and guidance for REDD+ were finalised at COP 21 in Paris in 2015. In the interim, many developing countries actively engaged in “readiness” activities, which included stakeholder engagement, analyses of drivers of deforestation and forest degradation, and the formulation of national REDD+ strategies that delineate possible REDD+ “actions” or policies and measures designed to address these drivers, as well as technical elements such as learning to measure forest carbon stocks and flows. A number of countries are now entering “phase 2”, or the “implementation phase”, which includes the implementation of REDD+ policies and measures.⁹

SOCIAL AND ENVIRONMENTAL RISKS OF REDD+

As REDD+ discussions progressed in the UNFCCC, it was recognised that its implementation could provide significant environmental benefits, including promoting biodiversity conservation and securing the provision of key ecosystem services, including water regulation, erosion control and the supply of non-timber forest products.¹⁰ In addition, REDD+ can result in social benefits such as improved governance and livelihoods, and potentially even strengthened land tenure rights. The environmental and social risks posed by REDD+ were also acknowledged. These include, among others, the possible depletion of biodiversity,¹¹ as well as involuntary displacement and other human rights violations.¹² Another major risk of REDD+ is corruption; in particular, the risk of misappropriation of funding targeted at REDD+.¹³

It is with the intention of mitigating these risks that parties to the UNFCCC adopted seven social and environmental “safeguards”. These embody key rights and principles

of international law associated with good social and environmental governance.¹⁴ Ensuring “consistency” of REDD+ implementation with these safeguards is a requirement linked to the delivery of results-based payments.¹⁵

Countries developing national REDD+ programmes will therefore need to take steps to identify the risks from REDD+, which include structural governance challenges such as corruption, and take steps to address them so as to ensure consistency with the UNFCCC safeguards during REDD+ implementation. If these risks are not well understood and addressed, the effectiveness of REDD+ may be threatened, leading to a loss of international and local legitimacy and support.

ASSESSING CORRUPTION RISKS FROM REDD+

It is in recognition of the need for developing country governments to undertake these efforts that Transparency International has developed a manual to clarify and address corruption risks in countries undertaking REDD+ programmes and strategies at the national level.¹⁶ The objective of this manual is to assist users to identify corruption risks and develop approaches to help address these risks within the development of national REDD+ action plans and strategies, and the implementation of REDD+ and other forest carbon projects. The aim is to facilitate the participation of national and local groups in informing national policy, planning and project implementation. This tool is principally designed for civil society actors who may work with other NGOs, governments and the private sector to help design systems that are transparent, accountable, responsive and thus effective. It will help inform and guide forest carbon risk assessments, but should be adapted by users to fit their country contexts.

THE SPECIFIC CIRCUMSTANCES OF IMPLEMENTING REDD+ IN AFRICA

Currently no REDD+ country has yet progressed to phase 3 of REDD+, including in Africa. Although countries in Africa currently engaged in REDD+ are highly diverse and generalisations should be avoided, there are nevertheless a number of common challenges faced by the governments in the four countries involved in this study, including:¹⁷

LACK OF TECHNICAL AND INSTITUTIONAL CAPACITIES

Despite many African countries having strong environmental or forest policies, weak technical and institutional capacities in the economic, scientific or technical aspects needed to implement and monitor REDD+ policies, particularly to the level of reporting required by most performance-based REDD+ investment programmes, lead to delays in meeting some of the performance terms of the initial investment packages.

CHALLENGES WITH REGARDS TO DEMARCATION OF THE FOREST ESTATE

This is also a significant challenge. The lack of consensual definitions of “forest” coupled with the lack of, or weaknesses within, formalised national systems of demarcation and mapping the boundaries of forests constitute significant challenges for identifying and avoiding internal displacement of emissions (leakage), whereby emission reductions achieved through the reduction of deforestation in one area leads to increased emissions in another area, thus “displacing” the emissions rather than eliminating them.

POLITICAL AND POLICY CONTRADICTIONS BETWEEN REDD+ GOALS AND OTHER DEVELOPMENT AIMS

Forest and climate considerations often do not appear in development strategies. This is not exclusive to African countries but represents a significant challenge nonetheless. In most cases they result from the fact that many countries implementing REDD+ activities are in the early stages of readiness. For other countries that have agreed to participate in REDD+, forest and climate considerations are still not a priority compared to other strategic development objectives.

HISTORICAL LACK OF CROSS-SECTORAL COORDINATION AND COOPERATION

There is poor coordination and cooperation between government ministries. As REDD+ in practice is multi-stakeholder, multi-sectoral and multi-institutional, it is placing new governance challenges on governments across agencies and institutions in ways that previous single entity or single agency policies have not.

OBJECTIVE, METHODOLOGY AND STRUCTURE OF THE REPORT

The objective of this report is to provide an overview of corruption risks from REDD+ in four African countries, to identify common challenges and differences, and to examine potential solutions and innovative options to tackle these challenges. The report was developed primarily through a desk-based literature review for the contextual information, and the findings of the report are based on an analysis of country CRAs carried out by Transparency International chapters in Cameroon, Ghana, Zambia and Zimbabwe. This report contributes to a growing body of studies on REDD+ corruption risks in Africa, such as those supported by the UN-REDD programme in Kenya¹⁸ and Malawi as well as the studies undertaken by U4.¹⁹ Even though the methodologies differ, these studies together reflect awareness of the governance risks and opportunities that underpin the national REDD+ processes in the Africa region.

The body of this report is made up of the summarised findings of the CRAs carried out in the four countries listed above. In the case of each CRA, stakeholders, who include representatives from government, academia, the judiciary, NGOs, the media, international organisations and the private sector, were selected based on their vast and varied experience in the forest sector. In each country, CRA participants engaged in focus group discussions, as well as interviews. Based on their knowledge and experience, they first identified potential corruption risks linked to a number of REDD+-related activities and thematic areas. They then considered the likelihood that those risks would occur and the impact they may have were they to occur. The most severe risks (those with the greatest likelihood of occurring and the greatest potential impact) were then considered for follow-up action.

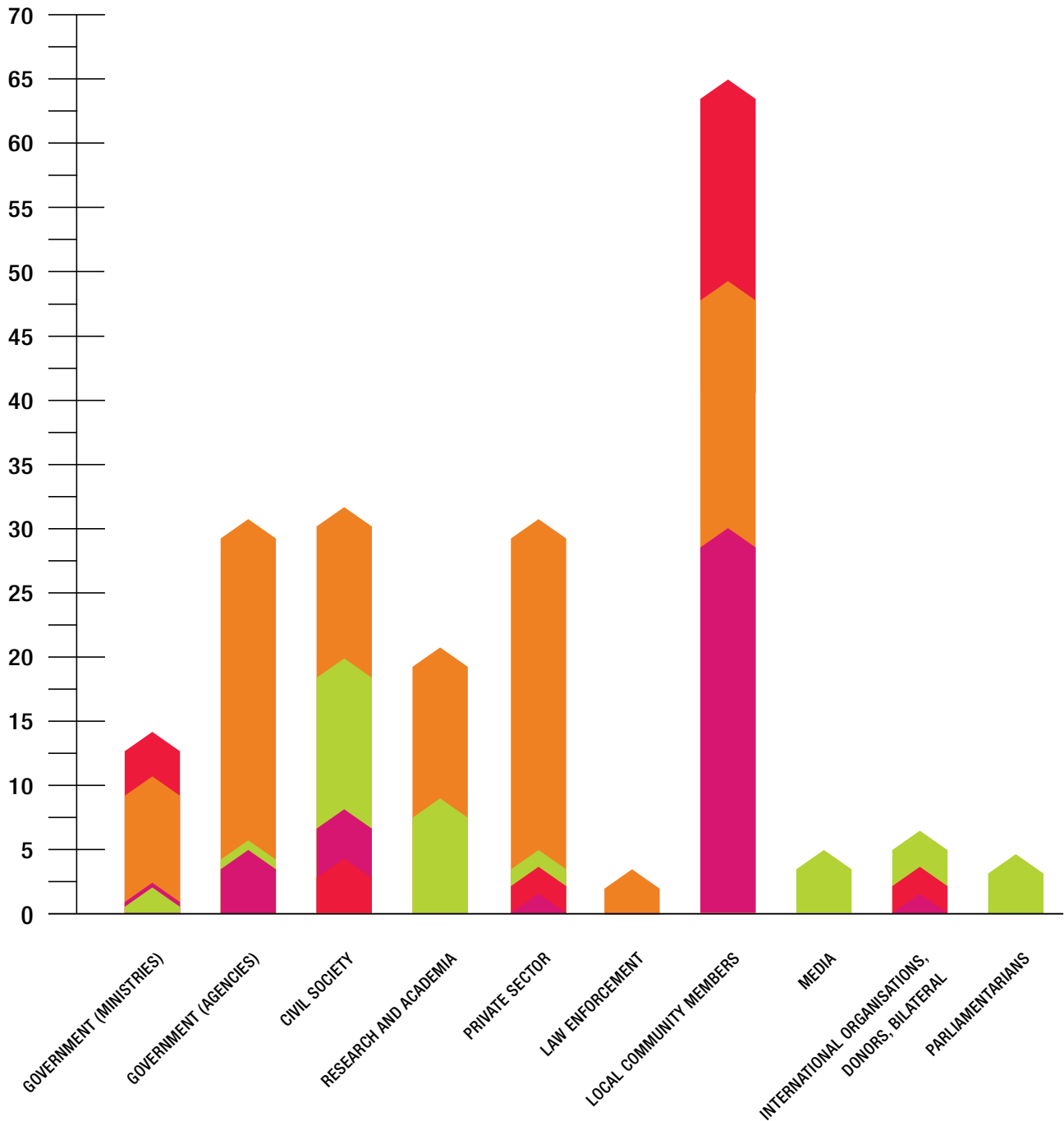
As can be seen in the CRA “factsheets” (presented as annexes to this report) which summarise the findings of each of the four country CRAs, each Transparency International national chapter developed a different structure to illustrate the findings of their CRA, derived to a large extent from observations on the ground. The findings outlined below are organised into categories which represent “pillars” of good governance. This classification reflects the top categories of risks identified by participants, based on their past experience in the forest sector. Each of these categories, if dealt with effectively, can significantly mitigate the risks of corruption arising from the respective national REDD+ programmes. However, if not adequately addressed, the risks of corruption from REDD+ are likely to be high.

The categories are the following:

- ensuring adequate access to information
- ensuring full and effective participation
- security of tenure
- fair allocation and disbursement of funds
- access to justice
- MRV (Carbon) and Monitoring Systems

OVERVIEW OF STAKEHOLDERS CONSULTED DURING RISK ASSESSMENT PROCESS

GHANA ZAMBIA CAMEROON ZIMBABWE



TOTAL OF ALL COUNTRIES = 373 STAKEHOLDERS

A large stack of cut logs is the central focus of the image. The logs are piled high, with some showing dark, charred bark and others showing lighter, freshly cut wood. The background is a dry, open landscape with sparse, low-lying vegetation and a few trees in the distance under a clear sky. The overall scene suggests a logging operation in a natural, possibly semi-arid environment.

CORRUPTION RISK ASSESSMENTS: FINDINGS

CORRUPTION RISK ASSESSMENTS: FINDINGS

For each of the following categories, the corruption risks listed are those that were identified by the CRA participants as being the most severe and with the highest likelihood of occurring, based on their own experience of the forest sector.

ENSURING ADEQUATE ACCESS TO INFORMATION

WHY THIS IS IMPORTANT

“Access to information” (see text box) means ensuring that the public has a right to access information held by authorities that is relevant to forest-related processes, subject to the exceptions necessary to protect vital public interests – for example, national security.

The expressions “access to information”, “freedom of information”, the “right to know”, and the “right to [official] information” denote the same concept: that information held by governments is in principle freely and openly accessible by all, subject only to narrow exceptions. Usage of these terms depends on context, culture and language. For example, more recent rights based approaches in East Asia prefer the “right to know”, while more traditional approaches in North America and the United Kingdom use the term “freedom of information”.

Source: UNDP, Fast Facts on E-Governance and Access to Information, 2012.

The right of access to information is essential to combating corruption, and is particularly crucial for the success of REDD+.²⁰ In addition to their obligations under international and national law, REDD+ countries are expected to meet higher standards of transparency and participatory decision-making processes, including through the provisions of the Cancun Agreements, which require that REDD+ participating countries ensure “transparency” when undertaking REDD+ actions,²¹ and the development of information systems on REDD+ safeguards.²²

Without adequate information, relevant stakeholders are unable to participate effectively in consultations related to the design and adoption of REDD+ interventions. This situation creates a notable corruption risk, as it may lead to the adoption of REDD+ actions that benefit a few and may hinder the rights of other relevant stakeholders. Moving beyond the design phase, a lack of transparency about how policies and measures are effectively occurring, and their social impact (positive or negative), is equally important.

FINDINGS

The need to ensure access to information throughout REDD+ was identified as a key governance challenge by the CRA participants in each country. Overall, significant concerns were raised over the lack of accessibility of information in every CRA, both regarding REDD+ in general, and in relation to the policies and measures being developed as part of the national REDD+ programmes. Particular mention was made of the asymmetries in information between government or project implementers on the one hand, and communities/civil society on the other. CRA participants also complained that access to information relating to funding obtained and spent on policy development and implementation was restricted, with donors being the only stakeholders outside of government getting the full picture. Participants expressed their concerns over a lack of information enabling notable corruption risks in the context of REDD+.

For instance, in Zambia the assessment found that knowledge and overall information about REDD+ in terms of what activities are happening, how to get involved and the role they can play is uneven, and is much higher at the national level compared with the district level. This lack of knowledge relates not just to the public, but also applies within some government ministries. The lowest levels of awareness and understanding of REDD+ are at the community level. In addition, at the sub-national level, stakeholders have noted that during the development of the national REDD+ strategy, information was not systematically made available to relevant stakeholders and consultations were lacking.

In Cameroon's assessment, participants were particularly concerned about how poor access to information will inhibit their involvement in the future social and environmental impact assessment of REDD+ readiness. They fear that without sufficient access to information on the process, they will be unable to voice their concerns and that information inputted on the potential social and environmental risks linked to REDD+ will be inadequate and one-sided.

ENSURING FULL AND EFFECTIVE PUBLIC PARTICIPATION

WHY THIS IS IMPORTANT

Participation is considered to be one of the fundamental principles of democratic governance (See box 2). Failure to ensure full and effective participation during policy development and implementation significantly compromises the ability of stakeholders to effectively hold government actors accountable, therefore undermining one of the key democratic checks on corruption.

Box 2: Understanding full and effective participation

Public participation can be understood as: "All interaction between government and civil society, and includes the process by which government and civil society open dialogue, establish partnerships, share information, and otherwise interact to design, implement, and evaluate development policies, projects, and programs. The process requires the involvement and commitment of all interested parties, including, among others, the poor and traditionally marginalised groups, especially disadvantaged racial and ethnic minorities."

Ensuring "full and effective participation" requires the recognition and implementation of a number of procedural rights. This includes: providing relevant information to stakeholders in promptly and in a culturally appropriate manner; ensuring stakeholder consultation in decision-making processes at local, regional, and national levels, while respecting traditional decision-making and governance systems in indigenous lands and territories; and providing stakeholders with access to recourse mechanisms regarding participation in decision-making.

Source: Rey et al. 2012

Public participation is essential in combating corruption, and is particularly crucial for the success of REDD+, both to ensure the full and effective engagement of relevant stakeholders and as a foundation for transparency and accountability. In addition to their obligations under international law, REDD+ countries are expected to meet higher standards of transparency and participatory decision-making processes, including through the provisions of the Cancun Agreements, which require that REDD+ participating countries ensure “full and effective participation of relevant stakeholders” when undertaking REDD+ actions.²³

FINDINGS

Stakeholders in every CRA agreed that ensuring public participation is a major governance challenge; it was highlighted as being particularly important in tackling the corruption risks from REDD+.

Participants in the CRA process in Zambia were particularly critical of what they considered a historical failure to ensure adequate participation of the public, in particular in Zambia’s forest sector. The CRA noted that even when relevant stakeholders have been consulted, consultations have been partial, with either incomplete information presented to stakeholders, or, following the consultations, failure to demonstrate how stakeholder views were taken into account, if at all. This has also been the case both in the context of REDD+ strategy development and in the development and implementation of pilot projects, raising concerns for the implementation of REDD+. Such a situation creates notable corruption risks, as it may lead to the selection of REDD+ actions/projects that benefit a few, and may also lead to the adoption of REDD+ actions which may have serious negative impacts on many stakeholders, their livelihoods and local environments. CRA respondents in Zambia also noted that the functioning of traditional decision-making structures at the local level can represent a significant

obstacle to full and effective participation. The usual mode of consultation at the village level is for project proponents or local state representatives to discuss projects or policies with traditional leaders, who then give consent on behalf of their communities. Beyond this, the level of consultation within the community is at each leader’s discretion. This concentration of power and lack of internal consultation within communities creates high risks of corruption as the chief and/or a small number of close advisers (the local elite) may be bribed to influence the process and may therefore not discuss the potential impacts and benefits of the proposed REDD+ projects with the rest of the community.

According to participants in Ghana, a lack of public participation in decision-making has led to significant interference from powerful political figures. They note that there is a high inclination in Ghana’s forest sector to manipulate, pressure and interfere in policy-making and implementation to accommodate friends, and receive commissions. The absence of effective mechanisms to allow for public participation in these processes means that decisions are not scrutinised. In the context of REDD+, this governance weakness may lead to the selection of REDD+ actions/projects that benefit a few, and may also lead to the adoption of REDD+ actions which may have serious negative social and environmental impacts.

In Zimbabwe, it was noted that, considering the limited level of community participation, corruption in the implementation of the currently ongoing and future REDD+ initiatives is highly likely. This is linked to the section discussed above, as lack of understanding of REDD+ and the identified information asymmetry were highlighted as limiting community participation. This lack of community participation in REDD+ is itself symptomatic of the marginalisation of communities within natural resource governance more broadly.

SECURITY OF TENURE

WHY THIS IS IMPORTANT

Typically, tenure rights in Africa are defined by a mixture of statutory laws and customary norms, including in grassland and forest areas, where REDD+ will likely be implemented. However, these rights are often poorly defined, weakly enforced or even overlapping and/or contradictory, meaning that conflicts over tenure in these areas are not uncommon. The degree of clarity and security of tenure rights (or lack thereof) will significantly influence the ability of individuals and communities to participate in the decision-making processes that establish rights and responsibilities associated with REDD+ actions, and on their ability to benefit from REDD+ activities. This specifically impacts on women, who often merely possess usufruct rights to the land they rely on for their livelihoods, meaning that they have no decision-making power when it comes to selling the land and/or benefiting from the REDD+ process.

In addition, forest carbon represents a relatively new commodity. Reforms to national legal frameworks may be required to clarify the ability of rights holders to own and benefit from the trade in emission reductions. In developing countries, the potential increase in land values from payments for carbon storage and uncertainties about who will benefit create the potential for tenure conflict and corruption.

FINDINGS

The prevailing land tenure context in all of the countries is characterised by overlap and the co-existence of various land tenure forms which simultaneously allocate to the state, community and the individual incongruous and various levels of legal title to land, and the resources therein. This situation causes tensions when compared to the conventional concept of property rights that underpin the REDD+ approach. Land tenure insecurity is a key governance challenge across all countries subject to this assessment, and CRA participants unanimously recognise the corruption risks from REDD+ due to this situation.

For example, the lack of clarity surrounding tenure and carbon rights in Zambia has led to fears that local stakeholders could be excluded from the financial benefit-sharing mechanism, while local elites, including traditional leaders, reap the rewards. In Zimbabwe, the Communal Land Act grants only users' rights to communities, effectively excluding them from negotiating directly with private investors. The lack of any clear policy, legal and regulatory protections in relation to forest tenure and carbon rights exposes communities to corruption risks such as land grabbing by the elite and embezzlement of results-based payments. The lack of any REDD+-specific regulatory frameworks also exposes communities to the risk of being short-changed by carbon traders. In Ghana, uncertainties surrounding land and tree tenure, especially in local cocoa landscapes, were identified as particular causes for concern and as susceptible to corruption, including a particular risk that land-use planning will favour more powerful interests and political elites.

FAIR ALLOCATION AND DISBURSEMENT OF FUNDS

WHY THIS IS IMPORTANT

Economic flows for REDD+ or positive incentives to undertake REDD+ actions will be essential to achieving REDD+'s overall objectives. Diversion of these revenues by corrupt actors compromises the objectives of REDD+ and can lead to perverse incentives to continue degrading forests, or result in the exclusion of vulnerable groups from the potential benefits, as well as damaging their existing livelihoods. Unregulated and poorly reported revenue flows allow for the laundering of the proceeds of crime (illegal logging and other associated crimes), which may have a wider effect on the economy and social conditions of a country.²⁴

At another level, in relation to sharing benefits arising from REDD+, countries need to ensure that arrangements for benefit-sharing are fair, including through the design of inclusive and understandable procedures for determining eligibility to benefit. This will be particularly important for realising the so-called non-carbon benefits of REDD+, such as livelihood enhancement, and ensuring that the trade-offs for sustaining carbon pools in forested areas (lost income) are outweighed by the benefits derived from REDD+.

It should also be emphasised that benefit-sharing is closely related to land tenure and natural resource use rights, and recognition of such rights will need to be clarified in relation to fair participation and allocation of benefits derived from REDD+. Fair participation and allocation of benefits is therefore particularly crucial for the success of REDD+, both to ensure the full and effective engagement of relevant stakeholders and as a foundation for transparency and accountability. In addition to meeting their obligations under international law, REDD+ countries are expected to meet higher standards of transparency and participatory decision-making processes, including through the provisions of the Cancun Agreements, which require REDD+ participating countries to ensure "full and effective participation of relevant stakeholders" when undertaking REDD+ actions.²⁵

FINDINGS

Concerns over the lack of transparency regarding the disbursement of readiness finance have been raised in all CRA countries.

This lack of transparency is a cause for concern given the history of financial opaqueness of the respective forest sectors. All of the corruption risks associated with the theme of financial and economic flows were perceived by the majority of the respondents to be likely to occur. This has been largely linked to the weakness of national financial auditing systems.

In addition, due to the fact that the financial mechanism for managing REDD+ funds and the benefit-sharing mechanism have often not yet been established, the way in which REDD+ financial flows will be monitored (if at all) is currently unclear. If no such monitoring system is developed, significant corruption risks exist, including for the misappropriation/diversion of REDD+ funds.

In Zambia, the CRA participants at the community level raised concerns that the absence of a participatory process will leave REDD+ open to elite capture and thus affect the design of the benefit-sharing mechanism. In Ghana, CRA participants were most concerned by the possible misappropriation of funds or their misapplication due to personal interest given the forest sector's history, which includes infrequent financial reporting, under-reporting of forest revenues and lack of adequate control mechanisms to guide funding allocations. In Cameroon, stakeholders highlighted the risks of capture of readiness preparation funds by vested interests (linked to the development of the national strategy in particular) as significant, and also raised concerns regarding the embezzlement of financial benefits designed for local forest-dependent stakeholders.

ACCESS TO JUSTICE

WHY THIS IS IMPORTANT

Access to justice is a critical component of effective forest governance structures (see box 3). People who are wronged or mistreated in some way usually turn to their country's justice system for redress. Without adequate access to justice, individuals and groups will not be able to protect and enforce their rights, rendering those forest governance structures ineffective.

Box 3: concept of access to justice

In order to understand the concept of access to justice, it is necessary to appreciate that there are two types of rights recognised under human rights and environmental law. These are substantive and procedural rights.

Substantive rights refer to human and environmental protection rights, such as the right to freedom and environment quality that permits a life of dignity and well-being.

Procedural rights are the means to implement effectively and ensure compliance with substantive rights. These include: equality before the law, access to effective judicial proceedings, the right to a fair trial, and the right to an effective remedy.

Although confusion remains as to the precise nature of access to justice, it is often understood as a form of grievance mechanism against violations of the full range of human rights, including economic, social, cultural and environmental rights, whether they are substantive or procedural. It has been considered that in ensuring adequate access to justice, countries have an obligation not to obstruct access to those remedies and also, in particular, a positive duty to organise their institutional apparatus so that all individuals can access those remedies.

Source: Rey et al. (2013)

Access to justice is a critical building block for preventing and addressing corruption in the context of REDD+. Different corruption risks, ranging from misappropriation of results-based payments destined to forest-dwelling communities to the selection of REDD+ policies and measures that benefit the few, can be deterred and addressed through appropriate access to justice and adequate enforcement.

FINDINGS

The lack of effective access to justice can undermine efforts to ensure the accountability of the use and distribution of funds, is likely to reinforce land tenure insecurity due to unresolved conflicts, and weakens the chance of effective participation, among other results. Linked to access to justice, enforcement is also a serious issue, with activities such as illegal logging, illegal occupation of forest land (encroachment) and corruption being major challenges facing the forestry sector. Despite the magnitude of the problem, there are a few instances of prosecution and punishment, undermining access to justice as a whole.

In Ghana, there is notable absence or lack of effective protection for whistleblowers, and a lack of capacity for enforcement of the law and punishment in cases of corruption. This lack of effective legal remedies, coupled with weak enforcement, may lead to widespread corruption in Ghana's REDD+ processes. In Cameroon, CRA participants raised the concern that justice could be compromised if the design of a conflict management mechanism failed to take into account traditional conflict management methods and structures already in place, thus potentially compromising vulnerable groups. This in turn can lead to overall corruption in the context of REDD+, as there is inadequate access to justice for relevant stakeholders and, in particular, vulnerable groups. In Zambia, it was noted that there is not yet an independent grievance mechanism through which violations and wrongdoings can be reported. Currently, even when stakeholders experience or witness wrongdoing at the local level, they do not report these through existing channels for fear of reprisals. The same goes with Zimbabwe, where it was observed that forest-dependent communities are fearful of airing their grievances or reporting any wrongdoing on REDD+ processes. Communities fear deprivation and/or intimidation at the hands of fellow citizens or local leadership, and therefore prefer to ignore inconsistencies in local REDD+ processes. This lack of access to justice may also lead to a failure to identify and deal with corruption in the Zimbabwe REDD+ processes.

MRV (CARBON) AND MONITORING SYSTEMS

WHY THIS IS IMPORTANT

It is important to consider that REDD+ depends for its effectiveness on the accurate measurement, reporting and verification of forest emissions and sequestration, and changes in forest carbon stocks. As REDD+ revenues will depend upon the extent to which a state can demonstrate that it has reduced its emissions and increased its removals compared to its reference level, the temptation to engage in fraudulent behaviour is high. When considering the corruption challenges surrounding REDD+, the effectiveness, transparency and accountability of systems designed to monitor progress made towards reaching REDD+ objectives (for both carbon and non-carbon objectives) are key. Achieving this may require that checks and balances are built into REDD+ core governance structures, be they those that implement policies or manage REDD+ funds, accounts or reports, and safeguards. Ensuring that progress is reported and shared with the public will further strengthen the accountability and transparency of REDD+

FINDINGS

Ensuring the effectiveness, transparency and accountability of monitoring and reporting systems for REDD+ is a broad governance challenge and is recognised by all CRA countries. Numerous corruption risks linked to these systems and their operations have been identified.

In Zambia, due to the lack of independent review and/or quality control procedures for the National Forest Monitoring System currently being piloted at the sub-national level, CRA participants felt that there was a real risk that the estimation and monitoring of emission reductions may be compromised by misleading or false reporting. Stakeholders in Ghana identified several possibilities for corrupt behaviour in the context of monitoring and reporting for REDD+, including implementers of REDD+ activities “double counting” emission reductions, manipulating the data used for resource inventories and performance reporting, including survival rates of reforestation efforts, and the manipulation of carbon and non-carbon reporting. Similarly, in Cameroon, based on their past experiences with other such initiatives, stakeholders identified the risk that figures relating to emission reductions achieved could be manipulated in order to generate additional results-based payments. They also highlighted the risk of falsification of the field data that informs environmental and social impact assessments during the REDD+ readiness to secure the validation of the project, glossing over possible social and environmental risks. However, stakeholders identifying these risks did not take into account the technical analysis by the team of experts provided for under the UNFCCC. Nevertheless, the level of concern here suggests that this technical analysis is highly desirable and will need to be designed effectively to identify such risks.

While there is currently no process underway in Zimbabwe to establish a safeguard information system (SIS), the CRA has found that the general concerns raised over the lack of transparency and participation in the REDD+ process also apply to the development and implementation of a future SIS, which risks being developed as a “rubber stamp” system. Stakeholders felt very strongly that the systems needed to be developed as a truly independent information system.



CROSS-CUTTING CONCLUSIONS/ RECOMMENDATIONS

CROSS-CUTTING CONCLUSIONS/ RECOMMENDATIONS

A large number of recommendations emerged from the four country CRAs. These recommendations can be read in full in Annex 1-4 – Country Factsheets. However, four recommendations are broadly shared across the countries and these are presented here. Transparency International will aim to support its national chapters pushing forward with these recommendations and will also seek to engage in coalitions with other stakeholders from across civil society, government, donors and multilateral organisations, as appropriate, to introduce necessary reforms to protect REDD+ from corruption.

RECOMMENDATION 1: DEVELOP A REDD+ TRANSPARENCY STANDARD TO IMPROVE ACCESS TO INFORMATION AND ENSURE THAT STAKEHOLDERS HELP DEFINE WHICH INFORMATION THEY NEED AND WHEN

In all four countries the CRAs found that access to information was lacking throughout the REDD+ preparations. While specific information gaps differ across countries, the common trend is the need for more transparency. To help address this issue, a “transparency standard” for REDD+ should be developed. This standard would outline the types of information that should be made available in any REDD+ programme and how the information should be made available (for example, online in machine-readable formats, offline and accessible for rural communities, regularly updated, and so on). This “transparency standard” could also include references to international best practices related to transparency.

RECOMMENDATION 2: STRENGTHEN PARTICIPATION IN THE REDD+ PROCESS BY TARGETING THOSE WHO ARE UNDER-REPRESENTED

Lack of knowledge and capacity to participate in REDD+ processes are common problems in all four countries studied. Although some stakeholders (CSOs, academia) have seen their capacities and degree of participation in REDD+ increase, this is not the case for a range of actors whose involvement is critical to ensure REDD+ is a success (local communities, district-level administration, parliaments, law enforcement and anti-corruption agencies). Greater efforts must be made to raise awareness and train stakeholders to play their distinct but important roles.

One option recommended to increase the capacities and participation of local communities is through the establishment of community hearings specifically designed to inform and elicit feedback and input from local communities into REDD+ development and implementation activities.

RECOMMENDATION 3:

PRIORITISE THE DEVELOPMENT OF STRONG INDEPENDENT DISPUTE-RESOLUTION MECHANISMS FOR REDD+ WHICH HAVE THE CAPACITY TO IDENTIFY AND DEAL WITH CORRUPTION-RELATED GRIEVANCES

REDD+ has the potential to create disputes, conflicts and complaints among the various actors hoping to benefit from it. This has been highlighted as a significant challenge in all CRA countries. It is essential therefore that authorities in REDD+ countries set up, as a matter of urgency, transparent, accountable, effective and efficient dispute-redress mechanisms as envisaged in the REDD+ safeguards. These mechanisms are intended to complement, not replace, formal legal channels for managing grievances. In order to be most effective, these mechanisms need to be established at all administrative levels and could build upon existing, traditional dispute-resolution arrangements, provided that they meet standards of independence and transparency. In addition to taking steps to accelerate the operationalisation of these mechanisms, it is recommended that REDD+ countries establish channels for victims or witnesses of fraud and corruption to seek remedial action and/or prosecution for wrongdoing as well as protection provisions/mechanisms for whistleblowers. In the meantime, avenues offered by not-for-profit entities such as Transparency International's anti-corruption hotlines can be used.

RECOMMENDATION 4:

IMPROVE SYNERGIES AND EFFECTIVE COORDINATION BETWEEN RELEVANT POLICIES AND INITIATIVES IN THE FORESTRY SECTOR

With the increasing number of initiatives to address deforestation and illegal logging, there is a greater need for synergies and coordination. Two examples of this are REDD+ and FLEGT. National REDD+ processes should continue to engage with the FLEGT processes where present, in order to benefit from the successes and lessons learned, including institutionalising information-sharing and learning. There is also a need to foster better coordination between sectors and government agencies beyond the forest sector. In particular, closer cooperation is needed between REDD+ institutions and organisations that focus on improving governance, such as government anti-corruption agencies.



COUNTRY FACTSHEETS

COUNTRY FACTSHEETS

The CRA for each country was carried out by the respective national chapters of Transparency International. The CRAs were carried out following an assessment framework developed by the organisation.²⁶ The assessment framework uses the following categories to structure the assessments:

- 1.** Policy legislation and regulation for REDD+
- 2.** Financial and economic flows
- 3.** Application activities
- 4.** Performance monitoring and reporting
- 5.** Enforcement

Although this was the framework used for the assessments, each Transparency International national chapter developed their own structure to illustrate the findings of their CRA, derived to a large extent from observations on the ground. For this reason, the structures and categories of information vary from one CRA to the other.

ANNEX 1: GHANA ASSESSMENT FACTSHEET



ANNEX 1: GHANA ASSESSMENT FACTSHEET

COUNTRY CONTEXT

Ghana has a forest cover of approximately 21 per cent of its total land area.²⁷ Of this, 8 per cent is classified as highly bio-diverse and carbon-dense primary forest. Deforestation is a critical issue with more than 34 per cent of its forests having been lost since the early 1990s.²⁸ Between 2005 and 2010, the rate of deforestation was estimated at 2.2 per cent per annum, the sixth highest deforestation rate globally for that period (FAO, 2010). The principle drivers of deforestation in Ghana are considered to be small-scale agriculture, timber harvesting, land conversion and mining. Forest loss in Ghana is considered largely incremental, that is, the emphasis has primarily been on degradation caused by multiple drivers rather than one major industrial driver.²⁹

Ghana has developed a number of national programmes to combat environmental degradation, including the Natural Resources and Environmental Governance Programme and the National Forest Plantation Development Programme, which aims at arresting and reversing deforestation rates in the country and taking steps to increase the national forest cover. Its engagement in REDD+ can be seen as a natural progression of this engagement in forest conservation.

Since 2010, Ghana has received support, primarily from the Forest Carbon Partnership Facility, to undertake various preparatory activities towards the design and implementation of REDD+, support which has been extended to enable the country to fully develop all the frameworks, systems and structures necessary for engagement in an international REDD+ mechanism. Additionally, Ghana has been selected into the pipeline of the FCPF Carbon Fund following approval of its Emissions Reduction Programme Idea Note. The vision of the emissions reduction programme is to reduce carbon emissions driven by cocoa farming practices and other agricultural drivers within the high forest zone, while

enhancing farmers' productivity and fostering a multi-stakeholder, public-private sector, collaborative effort across the programme area. The historical challenges in forest governance in Ghana include forest law enforcement, timber harvesting operations, permitting (timber rights allocation) and monitoring of forestry activities, many of which are relevant to the context of REDD+ and represent significant risks for corruption, which has deemed to be endemic in Ghana, including in the forest sector.

FINDINGS OF THE CRA

The likelihood of occurrence of potential corrupt activities that could negatively affect the implementation of REDD+ projects was examined and organised under four broad themes, identified according to the main risks emerging from the assessment process in Ghana: conduct and attitude, performance management/service delivery, financial and economic flows, and procurement management.

CONDUCT AND ATTITUDE

The assessment selected this theme as a way of demonstrating the extent to which those in positions of power can influence the process of REDD+ decision-making. Based on the past experience in the sector of those involved in the assessment, the following currently prevalent corrupt behaviours were identified as having strong potential to affect REDD+:

- politicians influencing the issuance of permits to accommodate friends, receive commissions or as owners of businesses
- manipulation, pressure and interference of politicians in policy-making and implementation
- interpretation of forestry laws and policies to favour vested interests
- misleading or fraudulent claims on carbon rights
- abuse of discretion with regards to the awarding of projects/consultancies

The majority of the respondents interrogated considered the likelihood of occurrence of these acts to be either “high” or “very high”. Most respondents agreed that there is much political interference in most sectors of the Ghanaian economy and some further alleged that major political players are engaged in the timber industry, mostly as businessmen. The institutional set-ups in most public institutions are such that politicians are the appointing authorities and hold tremendous power in decision-making. The same institutional set-up disposes the forestry sector to manipulation and interference in technical activities, which means that policy-making and implementation of REDD+ could very likely be tampered with or stifled in a manner that could prevent the realisation of REDD+ outcomes.

PERFORMANCE MANAGEMENT/ SERVICE DELIVERY

The assessment selected this theme due to the large number of risks expected to arise at the stage of REDD+ implementation. In particular, and based largely on participants’ previous experiences in the forestry sector, a number of corrupt behaviours associated with the theme of “performance management/service delivery” were identified as potentially affecting REDD+, including (but not limited to): implementers of REDD+ activities fraudulently double counting and reporting REDD+ activities; abuse of discretion in the selection of personnel to be sent for training; and fraudulent resource inventories and performance reporting.

All of the corrupt activities mentioned above were perceived by the majority of the respondents to be likely. The majority of the respondents were neutral to the possibility of “manipulation of carbon and non-carbon reporting” occurring. However, rather than being seen as an indication that no corruption is expected in this area, it could mean that most participants perceived the area of carbon reporting to be an area that is not fully understood: most of the respondents have no experience with the implementation of carbon projects which could potentially have an impact on the responses.

FINANCIAL AND ECONOMIC FLOWS

The following corrupt behaviours associated with the theme of “financial and economic flows” were identified as potentially affecting REDD+:

- diversion or misappropriation of funds
- infrequent financial reporting
- misappropriation of funds
- under-reporting of forest revenues
- inappropriate allocation and disbursement of forest revenue to stakeholders
- inadequate control mechanisms to guide fund allocation
- inadequate access to information on fund application

In relation to the identified risk of inappropriate allocation and disbursement of forest revenue to stakeholders, CRA participants noted that the current challenges and dissatisfaction of the benefit-sharing arrangement for timber resources should not be transferred to the REDD+ benefit distribution systems. In particular, the payments of royalties to traditional “stool” authorities as part of customary law were not considered adequately open to allow people to know what had been disbursed and how much had been used for developmental activities.

All the corruption risks associated with the theme of financial and economic flows were perceived by the majority of the respondents to be likely. This has been largely linked to the weakness of national financial auditing systems.

PROCUREMENT MANAGEMENT

Public procurement was identified as one key theme where corruption risks were expected to emerge in Ghana. The following corrupt behaviours associated with the theme of “procurement management” were identified as potentially affecting REDD+:

- overpricing of equipment and supplies
- collusion (of politicians, investors and REDD+ implementers) in the bidding or approval of contracts

Both of these behaviours were identified as having a very high likelihood of occurring. It was noted that due to the scale of REDD+ in Ghana (landscape interventions) there are many activities that will have to be awarded to contractors, because the designated institutions or the project implementers might not have the capacity to implement all the activities and the data needs of the project. There is a high risk is that due to collusion and corruption within the public sector, the right service providers with the competence needed will not be engaged or outputs that are expected will not be as required, thus potentially affecting the effectiveness and sustainability of REDD+ outcomes.

RECOMMENDATIONS

RECOMMENDATION 1: IMPROVE ACCESS TO INFORMATION

The Forestry Commission should ensure that the supporting documents that guide the implementation of the Ghana REDD+ strategy include comprehensive provisions for transparency of REDD+ activities at national and local level. Among other things, publishing the following information should be required:

- planning documents
- project budgets
- contracts
- project compliance reports
- basic data on baseline forest conditions and emissions data
- registered complaints related to REDD+

The information provided should be current and updated at least once every quarter and published online. As far as possible raw data on emission levels, on carbon credits and financial flows should be made available as well through the Ghana Open Data Portal. Additional channels of information should be used to ensure rural communities affected by REDD+ activities have easy access to offline information, for example through information bulletins made available at the district assemblies or the district offices of the Forestry Commission, or through district stakeholder fora.

As the key stakeholder in the Steering Committee of the International Aid Transparency Initiative, the government of Ghana should encourage donors to provide comprehensive data on overseas development aid flows (including those related to REDD+) in the International Aid Transparency Initiative standard. The government of Ghana should also strengthen existing legislation on reporting requirements of private companies operating in Ghana to reflect transparency in the REDD+ context.

In addition, project proponents should include provisions to make information available on planning documents, project budgets, contracts, and project compliance reports, and should also incorporate greater access to basic data on baseline forest conditions. These information sources will provide the basis of oversight as well as advocacy by CSOs at all level. Due to this, the adoption of the Right to Information Bill into law is necessary. But in the short to medium terms, these sets of information could be deposited at the district assemblies or district offices of the Forestry Commission. District-level engagement with communities is needed to make information on the projects accessible to the communities. This could be in the form of durbars, which could mimic the district forest fora which were previously being held and should be a key responsibility of CSOs and Forestry Commission within the wider context of REDD+ safeguards.

RECOMMENDATION 2: ESTABLISH INDEPENDENT MECHANISMS FOR REPORTING CORRUPTION AND GRIEVANCES IN REDD+ ACTIVITIES

The Forestry Commission in collaboration with the judiciary is advised, in addition to expediting the establishment of a transparent, accountable, effective and efficient dispute-redress mechanism that includes corruption-related complaints, to set up a channel for victims or witnesses of fraud and corruption to seek remedial action and/or prosecution for wrongdoing, as well as appropriate protections for whistleblowers. The mechanism should be intended to complement, not replace, formal legal channels for managing grievances. Those assessing eligibility will decide whether the complaint should be directed to a different office within the organisation, or to a different organisation altogether. For example, complaints of alleged corruption in the procurement procedures may need to be referred to the Forestry Commission and/or Economic and Organised Crime Office. To increase the credibility of dispute-redress and whistleblowing mechanisms, civil society should be involved in oversight.

RECOMMENDATION 3: STRENGTHEN CAPACITIES AND PARTICIPATION IN REDD+ AT THE SUB- NATIONAL LEVEL (ESPECIALLY LOCAL COMMUNITIES)

There is a consensus that capacities and level of participation need to be increased at the sub-national level. Such interventions should target key government agencies, especially at the district level, as well as judicial authorities and rural communities. Rural communities, forest fringe communities and traditional authorities should also play a greater role in the oversight of REDD+ activities. Raising awareness about potential corruption in local REDD+ activities, including responsibilities and mechanisms for access to information, may further help prevent abuses of power and fraud. Civil society can play a key role here.

RECOMMENDATION 4: BENEFIT-SHARING ARRANGEMENTS

Benefit distribution arrangements must be open, transparent and timely. In addition, there must be broad-based consultations incorporating the views of various stakeholders both at the national, regional and community levels. Beneficiaries must have a strong say in the approach adopted in first of all deciding on percentages before disbursement of benefits. The Forestry Commission should significantly enhance the transparency of benefit-sharing arrangements and the inclusion of all key stakeholders in the decision-making process. Care should be taken to ensure that rural communities are fairly represented in this process.

RECOMMENDATION 5: CAPACITY-BUILDING FOR STATE ACCOUNTABILITY INSTITUTIONS

The current level of enforcement and punishment for forestry sector laws fail to act as a deterrent. The Forestry Commission is recommended to collaborate with the Ministry of Justice to develop a capacity-building programme on accountability and anti-corruption related to REDD+ targeting prosecutors, judges and court officials so as to eliminate impunity for forest crimes, and to ensure accountability and judicious use of REDD+ resources.

RECOMMENDATION 6: MONITORING

The REDD+ strategy includes provisions for independent monitoring. However, there are no specific regulations on how independent monitoring should be carried out and how independence can be ensured. The Forestry Commission should as soon as possible develop detailed regulation on independent monitoring in consultation with other key stakeholders. This regulation should ensure that the subcommittee on land and forestry and the rural communities play an active role in monitoring.

RECOMMENDATION 7: IMPROVE SYNERGIES AND EFFECTIVE COORDINATION BETWEEN RELEVANT POLICIES/INITIATIVES IN THE FORESTRY SECTOR

With the increasing number of initiatives to address deforestation and illegal logging, there is a greater need for synergies and coordination. REDD+ implementers, in particular, the Forestry Commission, should better engage with the FLEGT process, in order to benefit from the generally improved governance regime, including institutionalising information-sharing and learning and avoiding these two initiatives being implemented in a siloed manner.

ANNEX 2: ZIMBABWE ASSESSMENT FACTSHEET



ANNEX 2: ZIMBABWE ASSESSMENT FACTSHEET

COUNTRY CONTEXT

Zimbabwe is a land-locked country in southern Africa with natural vegetation cover characterised by savannah woodlands interspersed with open grassed drainage lines or “dambos”. A few patches of sub-tropical forests exist in the eastern districts. As of 2005, Zimbabwe’s forest area was 49 per cent of total land area with original forests constituting 7 per cent of land area. Most intact forest areas are within gazetted state forests, national parks, the eastern highlands and large-scale commercial farms.³⁰ Forests provide a wide range of timber and non-timber forest products and services to the majority of Zimbabwe’s population and they are being lost at an alarming rate due to agricultural expansion, urbanisation and local use for construction and fuelwood.³¹

In Zimbabwe, REDD+ is a fairly new concept. The country became a member of the UN-REDD Programme in 2013, where support is being provided for country needs assessment.³² However, Zimbabwe does not currently have a government-led national programme, as opposed to other African countries such as the Democratic Republic of Congo, Kenya and Tanzania. However, a sub-national REDD+ initiative is being run by a private company in the north-western part of the country. This initiative is known as the Kariba REDD+ Project, which claims to be the world’s largest forestry conservation project; it is being implemented by Carbon Green Africa in conjunction with four Rural District Councils (RDCs). Although not yet implementing a national REDD+ programme, the CRA aims to identify risks and lessons for the design of future REDD+ projects as well as to inform national policy processes.

The main governance challenges in the forest sector in Zimbabwe, which are highly relevant for the design and implementation of REDD+, include managing the contradictions between traditional rules and practice on the one hand and statutory law on the other. This has a major bearing on the issue of policing and monitoring of resource use at the local level.³³

FINDINGS OF THE CRA

The following sections provide an overview of the results of an assessment carried out by Transparency International Zimbabwe to identify the main vulnerabilities that may fuel corruption in the implementation of REDD+. Due to the fact that Zimbabwe does not actually have a national REDD+ programme, many of the corruption risks identified by the CRA are linked to this lack of a national approach, though others reflect more structural problems of forest governance in Zimbabwe.

ABSENCE OF A NATIONAL REDD+ PROGRAMME

While in many countries the REDD+ interventions/ activities are sub-national in scope, they generally are implemented within a national REDD+ framework, which includes a national REDD+ strategy and relevant institutional arrangements. Given that most REDD+ countries receive some form or other of “readiness” support, either from the FCPF, the UN-REDD programme, or from bilateral arrangements, REDD+ countries are often mandated by these “readiness agreements” to follow certain procedures/steps as part of their national REDD+ process.

This is not the case in Zimbabwe, where the Kariba REDD+ project is being implemented in the absence of a national REDD+ programme. The absence of a national framework means that stakeholders traditionally engaged in the REDD+ process, such as the Ministry of Water and Climate Change, the Forestry Commission and the Environment Management Agency, are not participating and have not been allocated clear roles. The lack of a national REDD+ programme poses challenges for national REDD+ policy development, management and implementation, monitoring, and measuring, reporting and verifying emission reductions. More broadly, the absence of a national programme means that there is no structure to ensure the effective involvement of relevant stakeholders, and low levels of capacity and awareness could give rise to corruption, including misappropriation of REDD+ funds. Finally, there is no oversight structure to monitor how private REDD+ projects, such as the Kariba project, are being implemented.

The absence of a national REDD+ programme also means that no measures are currently being undertaken to implement the UNFCCC REDD+ safeguards, a key requirement under the Warsaw Framework. In most countries, these measures take the form of a country approach to safeguards, where relevant national policies, laws and regulations are built upon to ensure that adequate checks and balances exist to minimise the negative risks that can arise from REDD+, including corrupt behaviours such as misappropriation of funds

LACK OF TRANSPARENCY

Lack of transparency, lack of awareness or improper access to information means that stakeholders who are not properly informed about a potential REDD+ project are not in a position to engage in an informed manner and are at risk of being exploited. In the context of the Kariba REDD+ project, numerous complaints have been made regarding the lack of transparency regarding the details of the project, including financial arrangements, both within the district councils and within and between the various communities. Only a small number of high-ranking local officials are aware of the details of the project, and requests for information have been rejected.

This lack of transparency means that there is no way to measure the effectiveness of implementation or even to determine how funds are being spent and to whom the financial benefits are being paid, and this contributes to mistrust among the various relevant stakeholders.

LACK OF PARTICIPATION

The lack of transparency in the development of the Kariba project means that the effective participation of relevant stakeholders is difficult, if not impossible. In addition to this, it appears that there has not been any ongoing process of ensuring the full and effective participation of local stakeholders. As noted above, this is in part due to the absence of a formal national framework of REDD+ implementation in Zimbabwe but is also symptomatic of a broader lack of public participation in forest governance as a whole.

Communities in Zimbabwe are generally excluded from the management and governance of natural resources, with no legal provisions supporting the right of relevant stakeholders to participate in decision-making and policy implementation, even when they are directly affected.

UNCLEAR FOREST TENURE

Clear and secure forest tenure rights have been identified as fundamental for good governance of REDD+ due to the close link between tenure and access to REDD+ payments at the local level. According to Zimbabwe's legal framework, the inhabitants of any communal land (local communities) are limited to usufruct rights over land, rather than ownership. This means that communities are excluded from negotiating directly with investors or the local government, which has implications for their ability to defend claims to REDD+ finance. This also increases the possibility of misappropriation of payments.

LACK OF A CLEAR MECHANISM FOR MANAGEMENT OF FINANCIAL AND ECONOMIC FLOWS

The absence of a formal framework for REDD+ in Zimbabwe also affects the allocation and distribution of financial benefits. There is currently no structure in place to monitor or oversee the distribution of benefits at either the national or sub-national level. This has had repercussions on the Kariba REDD+ project, where stakeholders have either complained of being completely excluded from benefit-sharing, or have complained about the lack of clear arrangements, including the absence of contracts and a general lack of transparency. This has given rise to allegations of corruption within the distribution process.

RECOMMENDATIONS

RECOMMENDATION 1: THE GOVERNMENT SHOULD DEVELOP AN APPROPRIATE POLICY AND REGULATORY FRAMEWORK FOR REDD+

The absence of a REDD+ strategy and/or policy in Zimbabwe makes it difficult for the coordination and regulation of REDD+ activities to be achieved. As it stands there is nothing which is legally binding on REDD+ investors in the country. Therefore, it is essential for the government to lead a REDD+ policy formulation process. A REDD+ policy would ensure that government (through responsible authorities), citizens and private sector comply with existing international and national legal frameworks governing REDD+ implementation. The process of developing a REDD+ policy should be a participatory one. It is also essential to mainstream anti-corruption during the REDD+ policy-making process.

The REDD+ policy should:

- Promote coordination, both vertical and horizontal, among government bodies, civil society and private sector to promote cross-boundary governance
- Improve involvement of vulnerable groups (forest-based communities), and promote adequate representation, equity and transparency
- Highlight potential corruption areas and possible cases of elite capture of land and benefits, which render policies ineffective and lead to inequity, inefficiency and possible conflicts, and propose specific regulation and mechanisms to address these risks
- Outline regulations for public and private carbon investors to ensure autonomy of the state from powerful private sector interests
- Ensure the administrative and technical capacity required for national actors on REDD+ by outlining the policies, laws and financial management systems.

RECOMMENDATION 2: ENHANCE THE TRANSPARENCY OF THE REDD+ PROCESS

Information related to REDD+ should be made publicly accessible. All non-confidential information should be online and machine-readable. RDCs should ensure that all information publicly available related to REDD+ activities and relevant for a given community is published locally at a government notice board or through offline means in English and local languages. In addition, the RDCs should use the full council meetings and ward meetings to share information on REDD+ and raise awareness of additional information available at the council.

The government should also improve existing freedom of information legislation to ensure that the public has prompt and easy access to information. More specifically for the REDD+ context, the following information should be made available:

- contracts between RDC and REDD+ investors
- the cumulative amount of carbon credits per year and per RDC
- the revenues generated from the sale of carbon credits per year and per RDC
- information on the benefit-sharing mechanisms among the communities, the RDC and the carbon investors

RECOMMENDATION 3: DEVELOP ACCOUNTABLE AND EQUITABLE FINANCIAL MANAGEMENT AND DISTRIBUTION MECHANISMS

It is essential to have a clear approach on how revenues from REDD+ activities will be managed. The strategy should describe a mechanism for the distribution of revenues to mitigate corruption risk on REDD+ economic and financial flows. The process of developing the strategy should be inclusive and should capture the views of direct beneficiaries of the REDD+ project. These include the Forestry Commission, the RDC, citizens, including marginalised communities, and private REDD+ investors. It is useful to consider weakness in similar community beneficiation schemes to be able to enhance the REDD+ benefit-sharing framework. The benefit framework should:

- Minimise intermediaries
- Establish an independent oversight mechanism
- Involve all key beneficiaries during all stages of the process both in terms of the decision-making and in terms of the allocation of benefits
- Promote women's participation and access to benefit-sharing.

In addition to the recommendations above, the Forestry Commission should consider achieving transparency and participation in REDD+ benefit-sharing by strengthening the accountability and representation of environmental health committees in the benefit-sharing processes. It would be useful for RDCs to initiate a community engagement exercise through community meetings or community hearings to establish what citizens' local priorities and favoured models towards accountability and distribution of funds are. Using the public sphere model for deliberate participation, this approach could help overcome the risk of selective representation and elite bias.

RECOMMENDATION 4:

ESTABLISH AN INDEPENDENT MONITORING PLATFORM/BODY FOR REDD+

Civil society and the media play a crucial role in monitoring and reporting on REDD+ activities. Therefore, it is suggested that the Forest Commission creates a coordinated civil society forum of organisations and experts that do not have commercial or vested interests in REDD+ activities. The government could play the role of choosing actors to the coordination forum through an open and transparent tendering process. Supporting a civil society monitoring body would be a significant commitment by the government of Zimbabwe to seriously addressing corruption in REDD+.

RECOMMENDATION 5:

DEVELOP AN ACCESSIBLE, PREDICTABLE AND TRANSPARENT GRIEVANCE REDRESS MECHANISM FOR REDD+

Such a mechanism would cover a range of issues that go beyond corruption but would allow for corruption-related issues to be dealt with, at least through the initial steps. Where instances of criminal behaviour are identified, these would necessarily be referred to the police or court. Those assessing eligibility will also be able to ascertain whether the complaint should be directed to a given office within the organisation or to a different organisation altogether. The Forest Commission should develop as soon as possible a comprehensive proposal for grievance and redress mechanisms, taking into account existing mechanisms and good practices from other countries. The grievance and redress mechanism should be independent and should be subject to a review involving all key stakeholders after one year of existence. The establishment of such a mechanism can draw on guidance such as the guidelines established by FCPF/UN REDD.³⁴

ANNEX 3: ZAMBIA ASSESSMENT FACTSHEET



ANNEX 3: ZAMBIA ASSESSMENT FACTSHEET

COUNTRY CONTEXT

Zambia is one of the most forested countries in Africa with approximately 67 per cent of its land surface covered by forest.³⁵ Zambia has a high rate of deforestation, and has been identified as one of the top 10 highest greenhouse gas-emitting countries as a result of deforestation and degradation.³⁶ The main drivers of deforestation in Zambia have been identified as charcoal and wood fuel production, logging for timber, expansion of small-scale agriculture and unsustainable agricultural practices.³⁷

Given this background, Zambia was considered to be a good option to seek emissions reductions through forest protection. In 2010 Zambia was selected as one of the pilot countries for the UN-REDD programme and was among the first three countries to receive funding from the programme, amounting to US\$4.49 million for the readiness phase.³⁸

This was the start of the REDD+ journey in Zambia. Zambia's forest sector is characterised by several governance challenges, including inadequate participatory forest governance, unclear tenure arrangements and inconsistent and conflicting policy and institutional frameworks at national and local levels.³⁹ These challenges have the potential to negatively affect the implementation of REDD+ if they are not adequately addressed, and have the potential to exacerbate corruption risks. This may include negative impacts such as land grabs, the exclusion of local populations from access, and use of the forests and/or unfair distribution of REDD+-related costs and benefits.

FINDINGS OF THE CRA

The following sections provide an overview of the findings of the assessment of the corruption risks in REDD+ in Zambia undertaken by Transparency International Zambia.⁴⁰ The findings have been organised based on the areas that have been identified as "key risk components".

CONSULTATION

Stakeholder consultation, in order to be effective, should be applied at every stage of the REDD+ process, including planning, implementation, monitoring and reporting and with adequate lead time, since decision-making among some local communities may take time. In particular, the following concerns were raised:

- **Historical failure to ensure full and effective participation in the forest sector:** Concerns have been expressed over the lack of full and effective participation, both during the REDD+ process and historically in the forest sector. In particular, sub-national stakeholders, such as local communities, and vulnerable stakeholders, such as women, have raised concerns over their lack of effective participation. Even when consulted, this has been partial, with either incomplete information presented, or failure to take their views into account. This has been the case both in the context of national REDD+ strategy development and in the development and implementation of pilot projects, raising concerns for the implementation of REDD+. In particular, there was both a lack of comprehensive local consultations and an unbalanced level of knowledge about REDD+ in Zambia – much higher at the national level compared with the district level, including within some government ministries, with the lowest level of understanding being at the community level.
- **Concentration of power within traditional leaders:** The usual mode of consultation at the village level is to discuss with the traditional leaders who give consent on behalf of their communities but the level of consultation with the community is at each leader's discretion. This creates a risk of corruption as the chief and/or a small number of close advisers (local elite) may be bribed to influence the process and may not therefore discuss or share the benefits from projects with the rest of the community.

FOREST TENURE

Clear and secure forest tenure rights have been identified as fundamental for good governance of REDD+ due to the close link between tenure and access to REDD+ payments at the local level. Land in Zambia is currently administered under both statutory and customary law. While statutory law is administered by government officials and applies to registered land, customary land is administered by traditional authorities based on unwritten and localised customary laws. There is no formal registration of an individual's rights to land under customary tenure and this puts the people living on such land in a vulnerable position, as they risk displacement. CRA participants identified in particular the following risks:

- **High concentration of power in the hands of traditional leaders**, who have the power to distribute or allocate land. There is therefore a high risk of corruption as the degree of tenure security often relies on the word of a single person. This is compounded by the fact that the Land Act in Zambia gives power to traditional authorities in relation to the allocation, alienation and the general administration of customary land.
- **The informal, fluid nature of customary tenure** (no official registration of customary tenure arrangements), coupled with the lure of REDD+ financial payments, could potentially incentivise land grabbing by elites, who are in better positions to obtain statutory rights over customary land and eject the previous owners or users.
- **Carbon rights**: If carbon rights are not clarified, there is no certainty regarding who is entitled to the financial benefits from emission reductions achieved from REDD+. According to the new Forest Act No.4 of 2015, carbon has been described as a forest product and is the property of the government until it is lawfully transferred. Depending on how the issue of carbon rights is dealt with in the legal framework, there is a significant risk of corruption and elite capture of the financial benefits of REDD+.

FINANCIAL AND ECONOMIC FLOWS

The REDD+ programme is still in its initial phase but considerable financial resources are flowing to prepare Zambia for REDD+ implementation. The challenges of forest governance in Zambia have given rise to concerns over the fact that these weaknesses could affect the way in which REDD+ finance is managed and distributed. The lack of full and effective participation of local stakeholders in the design of REDD+ policies and mechanisms, coupled with the lack of clarity surrounding tenure and carbon rights, have led to fears that local stakeholders could be excluded from the financial benefit-sharing mechanism, while local elites, including traditional leaders, reap the rewards. The following concerns were identified:

- **Lack of transparency regarding disbursement readiness finance**: Concerns have been raised about the lack of transparency regarding the expenditure of funds during the readiness process; no information was available to find out how much money was spent on each readiness activity.
- **Lack of clarity regarding the design of the benefit-sharing mechanism**: Concerns were also raised by participants regarding the risk that the design of the (future) benefit-sharing mechanism is not sufficiently participatory and is therefore open to elite capture.
- **History of tax avoidance in the sector**: The non-payment of associated taxes to government through tax evasion and illicit financial flows is a significant problem in the extractive sector in Zambia. This is likely to affect REDD+ financial flows as officials are bribed by companies to help evade tax and to avoid penalties.

PERFORMANCE MONITORING AND REPORTING

The extent to which monitoring systems exist and are able to gather information on the activities of government officials in an independent manner will heavily influence the degree of accountability of the REDD+ process in Zambia. The CRA presents the following findings:

- **Lack of clarity on how future REDD+ finance will be monitored:** Due to the fact that the financial mechanism for managing REDD+ funds, and the benefit-sharing mechanism have not yet been established, the way in which REDD+ financial flows will be monitored is currently unclear. If no monitoring system is developed, significant corruption risks exist, including the misappropriation/diversion of REDD+ funds.
- **Monitoring emission reductions:** The National Forest Monitoring has been established at the sub-national level. However, it must be noted that without adequate independent review and/or quality control procedures, there is a real risk of misleading or false reporting on carbon emissions reductions and other performance actions for personal gain.
- **Monitoring of safeguards:** One of the UNFCCC requirements for REDD+ is that countries establish a SIS. There is currently no such process underway in Zambia, but the general concerns raised over the lack of transparency and participation in the REDD+ process also apply to the development of the SIS, with the risk of developing a “rubber stamp” system rather than a truly independent information system.

ENFORCEMENT

The issue of enforcement is broader than strictly REDD+, and is a fundamental question of governance. In Zambia, enforcement is a serious issue, with activities such as illegal logging, illegal occupation of forest land (encroachment) and corruption being major challenges facing the forestry sector. Despite the magnitude of the problem, there are a few instances of prosecution and punishment. The CRA also found that lack of enforcement is due to the existence of cartels that include politicians, the police, forest officers and business people involved in timber smuggling. The lack of enforcement is one of the biggest challenges to tackling corruption in REDD+, as although Zambia has laws criminalising corrupt practices, enforcement of these is limited. Also linked to enforcement, the findings of the CRA indicate that there is a lack of independent grievance mechanisms for citizens to report corruption-related complaints at village level. Even when wrongdoing is witnessed at local level, it often goes unreported for fear of reprisals by the local authorities.

RECOMMENDATIONS

RECOMMENDATION 1: ENHANCE ACCESS TO INFORMATION/ TRANSPARENCY

To enhance transparency in the forestry sector the government of Zambia should expedite the process of enacting the Access to Information Bill as this will increase open access to information on REDD+ activities which would be provided upon request from citizens. The Forestry Department under the Ministry of Lands Natural Resources and Environmental Protection and the Interim Climate Change Secretariat under the Ministry of Finance should develop a system to publish comprehensive information on REDD+ on their websites and in the Forest Department offices at district level where REDD+ activities are taking place. The information to be published should be as comprehensive as possible and include, inter alia, the results of environmental and social impact assessments of REDD+ projects in the country, geospatial data on forests, logging and land use and detailed information on REDD+ funds received and how they are spent. The sharing of information should be prompt, accurate and make use of appropriate channels of communication for reaching rural communities, such public meetings at ward level, notice boards at government offices and radio programmes in local languages.

In relation to transparency of REDD+ financial flows, the Ministry of Finance should publish comprehensive information about inflows of REDD+ funds from national and international resources as well as spending data. This data should be updated at least twice a year. The financial flows can be made more transparent by including them in the Extractive Industries Transparency Initiative reporting, publishing payments made by REDD+ implementing companies to government and payments received by the government. Donor agencies should also provide complete information about REDD+ projects and flows according to the standards of the International Aid Transparency Initiative. Information published should include project budgets, individual financial transactions, spending reports, project reports, evaluations and sub-national geographic location. Finally, private REDD+ implementing companies should be required by law to publish financial and non-financial information online to increase transparency and to enable accountability.

RECOMMENDATION 2: DEFINE MECHANISMS FOR STAKEHOLDER ENGAGEMENT

The Forest Department in the Ministry of Lands, Natural Resources and Environmental Protection should clearly define mechanisms for stakeholder engagement that will ensure that the procedure for obtaining Free Prior and Informed Consent is respected and embedded in all REDD+ projects.

RECOMMENDATION 3: CLARIFY AND SECURE FOREST TENURE RIGHTS

An expedited revision of the Lands Act is required to clarify and to secure local communities' rights in settled areas currently designated as customary land and to limit the excessive powers of the traditional leaders to give out land without consulting community members. The development of guidance for the allocation of land under customary tenure to avoid forced resettlement or removal of people is also recommended. This law should ensure that communal land remains under the control of rural communities and that rural communities benefit from REDD+. As a possible safeguard against land misappropriation the government should consider the practice of land certificates, which would provide greater security to the community. The revision should also clarify the issue of carbon rights and carbon ownership in Zambia. The Ministry of Environment should also propose a law to take into account gender considerations in land tenure. A new land tenure law should ensure that women have equal access to land use and benefit from carbon rights.

RECOMMENDATION 4: BUILD STAKEHOLDER CAPACITIES

For a successful and corruption-free implementation of REDD+, all key stakeholders must have a good understanding of REDD+, its principles and mechanisms. Therefore, the Forest Department under the Ministry of Lands, Natural Resources and Environmental Protection, in collaboration with other concerned ministries and donor organisations, should develop as soon as possible a capacity-building programme to inform all relevant stakeholders about REDD+ and its implementation mechanisms. This capacity-building programme should include the relevant parliamentary committees, district assemblies, prosecutors, judges, police forces and the Anti-Corruption Commission. The Ministry of Environment, in collaboration with other concerned ministries and donor organisations, should develop as soon as possible a capacity-building programme to empower media and civil society representatives to play a watchdog role. Capacity-building should include training on the technical aspects of REDD+, carbon credits and measuring emissions levels, as well as training in data research and data use.

RECOMMENDATION 5: INDEPENDENT GRIEVANCE MECHANISMS SHOULD BE ESTABLISHED AND/OR STRENGTHENED AT LOCAL AND NATIONAL LEVELS

Hotlines for reporting cases of corruption at the national level, for example at the Anti-Corruption Commission and Zambia Environmental Management Council, need to be publicised so that people at the national and local levels are made aware of its existence. The Forestry Department should establish independent whistleblowing and grievance mechanisms at local and national level. The whistleblowing system should ensure confidentiality for whistleblowers and, as far as possible, transparency of the complaints registered.

RECOMMENDATION 6: IMPROVE ACCOUNTABILITY/OVERSIGHT OF REDD+ PROCESS

The Forestry Department should establish an independent oversight mechanism for all REDD+ activities, including project activities. This mechanism should include representatives from academia, civil society, the Anti-Corruption Commission and donor representatives. Furthermore, the Forestry Department should publish an annual report on REDD+. This report should be subject to a public hearing in parliament and include among other things a presentation of the contracts awarded, the sales of customary land and revenues accrued.

Local communities can play a role in monitoring REDD+ activities at the local level including measurements of carbon and oversight by demanding transparency and accountability. For this to happen, government, CSOs and donors should develop awareness-raising programmes and empower local communities to demand accountability.

ANNEX 4: CAMEROON ASSESSMENT FACTSHEET



ANNEX 4: CAMEROON ASSESSMENT FACTSHEET

COUNTRY CONTEXT

The Republic of Cameroon is a country renowned for its biophysical diversity and is considered to be a high forest cover country. Among the Congo Basin countries, Cameroon has the fourth largest amount of dense tropical forest, with around 42 per cent of the total land area (equivalent to roughly 20 million ha) covered in forest.⁴¹ The estimated annual deforestation rate ranges between 0.06–0.2 per cent, the latter placing Cameroon among the highest among Congo Basin countries.⁴² According to Cameroon's Readiness Preparation Proposal (R-PP), the main drivers of deforestation and forest degradation are agriculture, particularly shifting slash-and-burn cultivation and wood extraction.⁴³

Cameroon has been engaged in REDD+ since 2005 and has been a FCPF country participant since September 2010, when the first grant agreement to develop an R-PP was signed. Cameroon is also a UN-REDD Programme Partner Country, and has been since 2011, but the FCPF plays the main role in terms of financial and technical support. In February 2013, the country's R-PP was approved by the FCPF, which triggered USD\$3.6 million for its implementation.

The country also submitted a Project Idea Note for an Emission Reduction Programme to the FCPF Carbon Fund in September 2015. Cameroon is still currently in the REDD+ preparation phase and is expected to finalise its national REDD+ strategy by the end of 2016.

Corruption in the forest sector in Cameroon is a major governance challenge, with the sector having been described as a "hub of corruption".⁴⁴ Corruption is a major problem at both the local and national levels, and it has been reported that the economic importance of the forestry sector makes it a "precious source of influence, political credit and reward in a vast system of Cameroonian clientelism".⁴⁵ This background of systemic corruption poses a significant risk to the sustainability and equity of REDD+ in Cameroon.

The following sections provide a summary of the findings of the assessment of corruption risks in REDD+ in Cameroon undertaken by Transparency International Cameroon. The study identified five key risk components of REDD+, namely, policy, legislation and regulation in line with REDD+, financial and economic flows, the implementation of REDD+ activities, performance monitoring and reporting and the institutional framework.

FINDINGS OF THE CRA

The assessment found that there are high risks of corruption in each of the five components of REDD+. In addition, the CRA highlights that it is important to pay particular attention to the preparation phase (for example, while defining major land-use trends, or assessing direct and indirect drivers of deforestation and forest degradation) that informs the REDD+ strategy in order to prevent corruption throughout the REDD+ implementation process.

POLICY, LEGISLATION AND REGULATION RELATING TO REDD+

This refers to the general policies (and their translation into domestic laws) that govern how actors within the sector operate (defining institutional arrangements and responsibilities), and, more broadly, regulate the REDD+ process in Cameroon.

Corruption risks linked to this component identified by CRA participants included the manipulation of data used to determine the baseline information for REDD+, such as historical land-use trends and drivers of deforestation and forest degradation. Given that the national REDD+ strategy should include actions designed to address drivers, this manipulation could lead to the formulation of a strategy that emphasises policy choices/options that may disproportionately benefit certain stakeholders or groups at the expense of other, more vulnerable groups. Proposed projects or actions are also subject to environmental and social impact assessments prior to their validation. The identified risk of falsification of field data could also affect this process, whereby risks are minimised or glossed over in order to secure validation. Finally, CRA participants noted the possibility of upward manipulation of figures relating to achieved emission reductions in order to generate additional results-based payments.

FINANCIAL AND ECONOMIC FLOWS

REDD+ finance is generally understood in terms of results-based payments. However, four types of finance linked to REDD+ can be examined, namely: 1) financing provided for the preparation phase or the development of the national strategy (donors, NGOs and private actors); 2) results-based payments; 3) fees and taxes paid on these payments; and 4) financial benefits distributed to local forest-dependent stakeholders. Although each type of finance was identified as potentially giving rise to corruption, respondents during the consultations highlighted the risk of the capture of funds for readiness preparations (linked to the development of the national strategy in particular) as the most significant.

IMPLEMENTATION OF ACTIVITIES

When referring to “implementation of activities”, CRA participants mainly referred to institutional arrangements for the management/coordination of REDD+ implementation (including MRV and safeguards), as well as procurement and staff recruitment related to this. Additional concerns were raised concerning nepotism during the procurement of experts or consultants that would form the REDD+ Technical Secretariat, thus potentially affecting their independence or quality of their work.

INSTITUTIONAL FRAMEWORK

This component is fundamental to ensuring the development of appropriate REDD+ interventions and their effective implementation. As the implementation of REDD+ is likely to be affected by activities (including that of the ministries) from outside the forest sector, it is therefore important to involve actors (state and non-state) from other sectors and put in place a robust, transparent, inclusive and fair institutional framework as a prerequisite for a successful REDD+ process in Cameroon.

A particular concern regarding the institutional arrangements for REDD+ is the absence of key stakeholders in the REDD+ Steering Committee, and high concentration of power within the Committee. The decision-making process within the Committee lacks transparency and inclusiveness, and could influence and even weaken governance and participatory component in the REDD+ process.

The lack of an independent review mechanism was also raised as a corruption concern. CRA participants noted that the REDD+ Steering Committee’s members could all be determined/imposed by powerful actors, thus undermining the diversity of actors involved in decision-making and increasing the possibility of elite capture of the Committee and, more broadly, of the REDD+ process in Cameroon.

RECOMMENDATIONS

RECOMMENDATION 1: ACCESS TO INFORMATION/PARTICIPATION

1.1. The REDD+ Technical Secretariat should ensure that its national REDD+ strategy has detailed provisions on transparency, independent monitoring and participation of key stakeholders, including rural communities, Parliament and other oversight mechanisms.

1.2. In order to ensure transparency, the Ministry of Environment, Protection of Nature and Sustainable Development should publish online on a quarterly basis comprehensive information relating to all REDD+ projects and all REDD+ activities in the country. The information to be published should include:

- contracts with companies
- progress reports by companies
- baseline data on emissions levels
- data on the distribution of REDD+ benefits
- donors contribution to the construction of the strategy

As much as possible, raw data on emissions levels, on carbon credits and financial flows should be made available as well. Additional channels of information should be used to ensure rural communities affected by REDD+ activities have easy access to offline information, for example through information bulletins made available at the district assemblies or the district offices of the Forestry Commission or through district stakeholder fora. The Ministry of Economy, Planning and Regional Development, having a supervisory role in all externally funded projects, could consider mandating and supporting such an initiative.

1.3. Local governments should be required to initiate a “public hearing” mechanism at local level to encourage local authorities in charge of managing REDD+ benefits to inform and report on the management of funds received. The REDD+ national coordination should develop a report form on funding received and granted in the context of the implementation of the REDD+ process. Companies should be required to fill out this form each quarter to ensure the traceability of funds. Companies’ reports should be published online in machine-readable formats.

1.4. The Ministry of Environment should escalate the development of a national SIS for REDD+, building on experiences from the FLEGT Voluntary Partnership Agreement process, to provide sufficient information that allows stakeholders to make an assessment of:

- the extent and effectiveness to which REDD+ stakeholder engagement is achieved
- the quality and effectiveness of in-country REDD+ grievance mechanism
- the quality of anti-corruption rules and safeguards for effective REDD+ implementation

RECOMMENDATION 2: ACCOUNTABILITY

In order to improve the accountability of the REDD+ process, the REDD+ Technical Secretariat should: Ensure that anti-corruption institutions (the National Financial Investigation Agency, Supreme State Audit entity and Ministry of public Procurement) are present at meetings related to the governance aspect of REDD+ so as to provide technical expertise.

Facilitate the development of an Anti-Corruption Action Plan for REDD+ drawing from the “Prevention, Education, Condition, Incentives and Sanctions” tool of the National Anti-Corruption Commission.

Develop an Integrity Charter for commissions, working groups and committees created within the framework of the implementation of the REDD+ process in Cameroon. This charter would define a code of conduct for its members in connection with the performance of their duties and to facilitate legal prosecution in case of suspected corruption.

Develop and implement a capacity-building programme for stakeholders within government to be able to execute and oversee REDD+ and to manage all corruption risks. Carry out an awareness-raising initiative to educate stakeholders on existing and potential corruption risks from REDD+, and clarify the roles and responsibilities of each actor in the mitigation of such risks.

International donors should make funds available for initiatives aiming at strengthening transparency and integrity in the REDD+ process in Cameroon to ensure proper management of funds.

RECOMMENDATION 3: TENURE

3.1. The REDD+ Steering Committee should ensure that the Forestry Grievance Redress Mechanism currently funded through the FCPF is adequate to ensure appropriate resolution of potential conflict over land. Such a conflict-prevention mechanism should include all relevant government actors. In addition, the REDD+ Steering Committee should propose steps to harmonise the laws of the various concerned ministries related to land use and clearly define the strategic options by agro-ecological zoning in order to reach a consensus with the ministries concerned.

RECOMMENDATION 4: PARTICIPATION

4.1. The REDD+ Steering Committee should include the Ministry of Mines as a member in order to broaden the scope of actors participating in REDD+ decision-making.

4.2. The decision-making system of the Steering Committee should be adapted to ensure “fair representation” of each group of actors.

4.3. Donors should continue to support civil society efforts to increase their political bargaining power. The current World Bank funding of US\$350,000 for strengthening the civil society platform is a good start but is limited in its scope. Other categories of civil society who perform an important function but fall outside the typical definition of environmental NGO should not be excluded. Donors should also provide support to anti-corruption CSOs to foster their advocacy in the prevention of corruption in the ongoing process.

4.4. The legal and operational framework regulating REDD+ projects and programmes should include a requirement that projects be validated by all interested stakeholders through a multi-stakeholder committee.

4.5. The REDD+ Steering Committee should introduce external/independent evaluation of the activities undertaken as part of each phase of REDD+ to ensure compliance with previous commitments.

4.6. “Public hearing” mechanisms should be introduced at local level to encourage local mayors (who according to the finance law of 2015 have the responsibility of managing funds allocated to local populations on their behalf) to inform and report on the management of received funds.

RECOMMENDATION 5: ENSURE FAIR BENEFIT-SHARING MECHANISMS

Taking into account studies on options that are currently being funded under the FCPF grant when completed, the REDD+ Technical Secretariat should develop a benefit-sharing mechanism to facilitate direct access to benefits by communities. The benefit-sharing mechanisms should be made transparent and subject to a public consultation with civil society.

A photograph of a lumber yard. In the foreground, there are large stacks of cut lumber. A man in a blue shirt and dark pants is carrying a long wooden plank on his shoulder. In the background, other people and more stacks of wood are visible under a cloudy sky with power lines.

ENDNOTES

ENDNOTES

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