



GOVERNANCE ASSESSMENT

**Central African Forest Initiative (CAFI) &
DRC's National REDD+ Fund (FONAREDD)**

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Governance Assessment

Central African Forest Initiative (CAFI) &
DRC's National REDD+ Fund (FONAREDD)

Supported by:



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Acronyms

AA - Administrative Agent

AFD - Agence Française de Développement

ASSA - Administrative Support Services Agreement

CAFI - Central African Forest Initiative

CAFI EB or **EB** - CAFI Executive Board

CAFI-S - CAFI Secretariat

COFIL - FONAREDD Steering Committee

CT - FONAREDD Technical Committee

DRC - Democratic Republic of the Congo

ENABEL - Belgian Development Agency

FAO - Food and Agriculture Organisation

FONAREDD - Fonds National REDD+

FONAREDD SE - Fonds National REDD+,
Executive Secretariat

FPIC - Free, Prior and Informed Consent

GIZ - German Agency for International Cooperation

IA - Implementing Agency

ICA - International Cooperation Agency

INGO - International non-governmental organisation

JICA - Japan International Cooperation Agency

LoI - Letter of Intent

M&E - Monitoring and Evaluation

MoU - Memorandum of Understanding

MPTF - Multi-Partner Trust Fund

MPTF-O - Multi-Partner Trust Fund Office

MRV - Measuring, Reporting and Verification

NIF - National Investment Framework

PGDF - Programme de Gestion Durable des Forêts

PIREDD - Programme Intégré REDD

PRODOC - Project Document

REDD+ - Reduction of Emissions due to Deforestation
and Forest Degradation

SAA - Standard Administrative Arrangement

UN - United Nations

UNCDF - United Nations Capital Development Fund

UNDP - United Nations Development Programme



EXECUTIVE SUMMARY

The Central African Forest Initiative (CAFI), is an initiative launched during the United Nations General Assembly in New York on 29 September 2015 to support strategic, country-level REDD+¹ and Low Emission Development investments focusing on Central African countries with high forest cover. CAFI aims to support governments in six Central African countries to implement reforms and enhance investments to conserve and sustainably use forest resources in the Congo Basin. Through these efforts, CAFI seeks to protect forests in the region in order to mitigate climate change, preserve biodiversity, reduce poverty among forest-dependent populations, and contribute to sustainable development. However, corruption threatens to undermine these objectives. Perceptions of corruption are high across the region (see Table 1). According to the 2019 Global Corruption Barometer, Africa, 80 per cent of citizens in Gabon and 85 per cent in the Democratic Republic of the Congo (DRC) think corruption has increased in the last 12 months.² If corruption and its drivers are left unchecked and undetected, support to CAFI's intended beneficiaries is threatened, ultimately causing irreversible harm to the second largest tropical rainforest in the world.

This report assesses the governance, transparency and accountability performance of CAFI and the DRC's REDD+ National Fund (FONAREDD). Since 2013, FONAREDD has served as a financial vehicle for the implementation of the National REDD+ Strategy in the DRC and has been tasked by the government with channelling CAFI funding amounting to US\$231 million.

As the two funds' performances and structures are interlinked, weakness in one has an impact on the other, making it critical to review both entities. The report is part of a series of similar governance assessments of climate funds by Transparency

International. It analyses the anti-corruption policies and practices that these two funds have in place, with a view to identifying shortcomings and appropriate risk mitigation measures.

The report is also intended to complement various ongoing and imminent evaluations of these two funds.³ These include the 2019 independent verification⁴ of progress made towards the milestones agreed in the Letter of Intent signed between CAFI and the DRC, the ongoing evaluation of CAFI, and the forthcoming evaluation of FONAREDD.

This study involved preliminary desk research and interviews with CAFI and FONAREDD Administrative Units (Secretariat, Executive Board, committees), the Multi-Partner Trust Fund office, donors and implementing agencies, civil society organisations (CSOs) and national administrations. It makes reference to CAFI and FONAREDD reviews, as well as underwent peer reviews, to validate or refine the findings. As a result, Transparency International has identified both good practices and areas where CAFI and FONAREDD's policies should be strengthened.

The report seeks to 1) assess the strengths and weaknesses of CAFI and FONAREDD's governance frameworks in terms of transparency, accountability, integrity and anti-corruption 2) describe the main findings of the assessment and 3) formulate clear recommendations from the findings to improve CAFI and FONAREDD governance performance and practices.



photo: Pixabay.com / Rudy and Peter Skitterians

Main conclusions

Measured against a series of benchmarks for climate funds developed by Transparency International, CAFI's policies and practices in relation to transparency, accountability and integrity are found to be mixed. The assessment uncovered strong anti-corruption rules and compliance with them, but weaknesses in other areas, notably opportunities for civil society and citizen participation. Further shortcomings include the need for more robust accountability and grievance mechanisms and for more careful consideration of corruption risks. Like all climate investment funds, CAFI should commit to a fund-wide policy of zero tolerance towards corruption, and improve access to information on key accountability mechanisms.

The high number of actors within the CAFI governance structure – in some cases playing multiple roles – results in potential conflicts of interest, complexity and policy gaps. As a coalition of donors, Central African partner countries and international partners, managed by an Executive Board and supported by a Secretariat, CAFI has unclear reporting lines and overlapping mandates. These are critical questions that should be tackled immediately. The problem is related to the fact that CAFI is an overarching vehicle representing the interests of distinct parties. There are many competing policies in place among

its constituent members and it is not always clear which should take precedence. CAFI should consider establishing rules of predominance for the various policies and procedures.

Despite FONAREDD performing well against the indicators for transparency and accountability, it still lacks strong anti-corruption and integrity policies to better address corruption issues. FONAREDD operations are currently governed by UN Development Programme (UNDP) regulations. In the long term, when national fiduciary management capacities meet international standards, the DRC's national administration will take over the management of FONAREDD. In the meantime, there is a need for FONAREDD to develop its own anti-corruption policies independently of UNDP, so it can fully play its role as a competent fund manager.

Key findings and recommendations for CAFI

- + **CAFI should establish an overarching information disclosure policy that is clear and readily available, including weblinks to the existing procedures of its development partners.**

CAFI does not have its own transparency and anti-corruption policy and relies on its members to adhere to their own integrity systems. The multiplicity of transparency and accountability systems and the lack of centralised access to the procedures established by different organisations contribute to systemic opacity.

- + **All key project information should be available on CAFI's website in both English and French, with direct access to in-country programme information, including reporting standards for investments, taxes paid, employees, assets, investors and investees' names, type and amount of investment, and number and nature of complaints received.**

The CAFI website is not always up to date regarding decisions, meetings and reporting.

- + **Memoranda of Understanding and agreements between CAFI and partner organisations should be readily available, either via the CAFI website or, at a minimum, on request, along with detailed, disaggregated financial information on programmes and consolidated data.**

Detailed data on disbursements is not available on CAFI's website or on the Multi-Partner Trust Fund website. This severely impedes oversight by external actors such as CSOs.

- + **CAFI's internal procedures should permit civil society, communities, and indigenous people representatives to act as observers in all fund discussions, and should not be overly bound by non-disclosure agreements.**

According to CAFI's Terms of Reference, no external third party beside Executive Board members and officially accredited observers is allowed to participate in board meetings, although ad hoc observers may be invited on request.

- + **The CAFI Secretariat should establish a specific formal procedure that would permit complainants, including people affected by CAFI-funded projects on the ground, to file an appeal or give easier access to the complex UNDP appeal procedures.**

To make a complaint on Executive Board decisions or CAFI Fund operations, the formal procedures oblige the complainant to use arduous UNDP mechanisms. This could explain why this formal mechanism is not used.

- + **The CAFI Secretariat should clarify the whistleblower protections available through participating organisations and establish a CAFI-specific whistleblower protection mechanism.**

There are provisions for whistleblower protection among participating organisations, but it is not clear how the CAFI Board or Secretariat could activate these mechanisms.

- + **The CAFI website should disclose which sanctions and enforcement capacities CAFI and its implementation agencies have at the national level.**

Each of CAFI's participating organisations has its own sanction mechanism for corruption and wrongdoing. However, there is little clarity over how and by whom sanctions would be enforced if corruption or fraud were uncovered at the local level in CAFI-funded programmes.

- + **Several actions should be considered to reduce opportunities for conflicts of interest. UNDP could restrict its remit to that of an active observer and voluntarily suspend its participation as an implementation agency. CAFI should ask for and publish declarations of conflicts of interest from its members.**

There is a major flaw in the CAFI decision-making chain, as UNDP faces significant conflicts of interest, given its triple role as the manager of the CAFI Multi-Partner Trust Fund, a member of the decision-making body and an implementing agency. In DRC, it is also the manager of FONAREDD. This conflict of interests is also the case for other members, including some implementing agencies.

Key findings and recommendations for FONAREDD

- + **As a national fund, FONAREDD – with the DRC Ministry of Finance acting as the coordinating entity – should renegotiate its agreements directly with Multi-Partner Trust Fund and develop its own transparency policies.**

FONAREDD's procedures on information disclosure conflict with the implementing agencies' own procedures. An implementing agency's policy has priority over FONAREDD's measures, according to the agreements signed with the Multi-Partner Trust Fund.

- + **The FONAREDD website should be more regularly updated. Careful attention should be paid to current dead links that are supposed to direct users to existing documents.**

There have been important delays in keeping the FONAREDD website up to date. Several inconsistencies with information available on the CAFI website also exist.

- + **Decisions made by FONAREDD bodies must be subject to open and transparent debates, in which CAFI should not be able to impose its own agendas.**

Some interviewed stakeholders pointed out strong links between CAFI and FONAREDD which might alter decision-making capacity at FONAREDD level and transparency in allocating resources.

- + **FONAREDD's Executive Secretariat should align its anti-corruption rules with those of its Technical and Steering Committees.**

There is a worrying discrepancy between anti-corruption rules and integrity screenings and training for the FONAREDD Executive Secretariat and for members of its Technical and Steering Committees.

- + **FONAREDD should include its own whistleblower protection system as part of its broader anti-corruption mechanism.**

There is no clarity on how FONAREDD would act to protect a DRC administration officer revealing corruption in relation to FONAREDD programmes.

- + **FONAREDD should continue and increase its funding support to enhance civil society participation during its implementation. The upcoming revision of the Letter of Intent presents a good opportunity for this.**

Despite extensive civil society involvement in the development of a civil society participation manual, it remains unclear how implementing agencies use this manual in the implementation of FONAREDD projects.

INTRODUCTION AND CONTEXT

Background

Transparency International is the global civil society organisation leading the fight against corruption. Through more than 100 offices worldwide and an international secretariat in Berlin, Germany, Transparency International raises awareness of the damaging effects of corruption and works with partners from governments, the private sector and civil society to develop and implement effective measures to tackle it.

Through Transparency International's work on integrity in climate governance, started in 2011, the organisation has been actively contributing to promoting anti-corruption measures, transparency, accountability and public oversight in the development and implementation of global and national climate governance.

This report is the assessment of the governance, transparency and accountability of the Central African Forest Initiative (CAFI) and National REDD+ Fund (Fonds National REDD+, FONAREDD) in the

Democratic Republic of the Congo (DRC). It is part of a series of similar governance assessments based on Transparency International's methodologies for anti-corruption assessment of climate funds, aimed at improving the governance of climate finance.⁵

Regional context

Central Africa is home to the second largest tropical rainforest in the world (almost 240 million hectares) and contains the highest biodiversity in Africa. It has been mostly spared from loss so far, but is under increasing pressure, and the land and forestry sectors are the main contributors to greenhouse gas emissions in the region. The region also faces major challenges such as poverty, inequality, food insecurity and a poor business climate. Weaknesses in governance, institutions and infrastructure make it difficult to successfully address these challenges.

Table 1 provides an overview of forest coverage, rate of deforestation, and corruption in Central Africa.

TABLE 1: CORRUPTION PERCEPTION INDEX (CPI) RATINGS OF THE SIX COUNTRIES INVOLVED IN CAFI AND THEIR CORRESPONDING FOREST COVERAGE AND DEFORESTATION RATES

Country	2019 CPI Rank (out of 180) and Score (out of 100) ⁶	Tree Coverage (2010) ⁷	Rate of Deforestation measured in kha/Mha (2019) ⁸
Central African Republic	Rank : 153 ; Score : 25	47.2 Mha or 76% of land area	49.0 kha
Democratic Republic of the Congo	Rank : 168 ; Score : 18	198 Mha or 85% of land area	1.22 Mha
Republic of Cameroon	Rank : 153 ; Score : 25	30.4 Mha or 66% of land area	120 kha
Republic of the Congo	Rank : 165 ; Score : 19	3.6 Mha or 80% of land area	73.8 kha
Republic of Equatorial Guinea	Rank : 173 ; Score : 16	2.63 Mha or 98% of land area	9.53 kha
Republic of Gabon	Rank : 123 ; Score : 31	24.7 Mha or 93% of land area	28.5 kha

REDD+ strategy in the Democratic Republic of the Congo

Over the 2010-2014 period, the DRC's deforestation rate reached 1.25 per cent,⁹ the highest in the region, accounting for 69 per cent of all forest area lost in the Congo Basin. According to studies carried out in 2012, the main drivers of deforestation and forest degradation identified at national level are:¹⁰

- + slash and burn agriculture
- + artisanal logging
- + charcoal production and wood for fuel
- + mining
- + bushfires.

The main underlying causes are:

- + population growth
- + institutional aspects (political decisions, deficient management, civil wars)
- + infrastructure and urbanisation
- + economic factors (economic crisis, unemployment, poverty).

In 2012, DRC adopted an ambitious National REDD+ strategy, as part of the UN programme for Reducing Emissions from Deforestation and Forest Degradation (REDD+). This was validated by the DRC Council of Ministers, to protect one of the largest areas of rainforest in the world. The REDD+ strategy aims to stabilise the DRC's forest cover to 63.5 per cent of national territory by 2030 and to maintain it subsequently. (In 2000, forest cover represented 67 per cent.)¹¹

The REDD+ strategy is based on seven pillars: land-use planning, land tenure security, sustainable agriculture and forestry, compensation for the negative effects of logging and mining, promotion of access to sustainable energy, control of population growth and governance improvement. The strategy seeks to address the drivers of deforestation, informed by land-use planning, to guide activities aimed at protecting forests and increasing agricultural productivity.

In 2013, the DRC adopted the REDD+ Investment Plan that identifies the priority policies and measures to be implemented and constitutes the first programmatic framework of the REDD+ strategy for the period 2015-2020. The Investment Plan is therefore a coordination tool that aims to align existing funding and support additional fundraising to finance the National REDD+ Strategy for the 2015-2020 period.



photo: Pixabay.com / Janyka Mitchell

OVERVIEW OF CAFI AND FONAREDD

CAFI is an initiative that supports strategic, holistic and country-level REDD+ and Low Emission Development Investments focusing on Central African countries with high forest cover.

DRC's REDD+ National Fund, FONAREDD, serves as a financial vehicle for implementation of the national REDD+ strategy in the DRC and is responsible for channelling CAFI's funds, currently amounting to US\$231 million in total.

CAFI

Brief history

Following the 17th Conference of the Parties in Durban in 2011, the Central African countries and several major international donors committed to support policy and governance reforms to reduce deforestation in the Congo Basin region and raise funds for this purpose. The Joint Declaration of Intent on REDD+ in the Congo Basin laid the foundation for the Central African Forest Initiative set up by a group of donors to coordinate efforts and address transboundary issues related to deforestation. The CAFI declaration was signed in September 2015 between the six Congo Basin¹² countries and seven donors.¹³

According to the CAFI declaration,¹⁴ the objective of the initiative is to recognise and preserve the value of the forests in the region and their role in mitigating climate change, reducing poverty and contributing to sustainable development. To achieve this, CAFI's support focuses on:

- + Developing and implementing National Investment Frameworks (NIFs) endorsed at the highest level by national institutions with cross-sectoral mandates.
- + Providing funding based on the achievement of policy and programmatic milestones that are spelled out in Letters of Intent. These letters set out the respective obligations and goals of the parties (i.e. CAFI and each of the partner countries) where the countries are committed to reduce their greenhouse gas emissions from deforestation and forest degradation, in line with their REDD+ strategy. In addition, the letters specify where CAFI is committed to mobilise and secure funding to implement interventions identified in the National REDD+ Investment Plan. They also detail the objectives that must be achieved through the monitoring of sets of milestones.
- + Encouraging donor coordination and alignment of bilateral assistance to partner countries based on NIFs.
- + Promoting inclusive participation of all stakeholders.



photo: Pixabay.com / Kudra Abdulaziz

CAFI Governance structures^{15,16}

The MPTF and MPTF Office

At the signing of the CAFI declaration, the major donors stressed the importance of (i) setting up a fund management system ensuring, as much as possible, secure and transparent management procedures in order to reduce aid fragmentation and (ii) increasing predictability through multi-year country-based financing strategies. A Multi-Partner Trust Fund (MPTF) was then established and hosted by the Multi-Partner Trust Fund Office of UNDP.^{17,18}

The MPTF Office, as administrative agent, is responsible for concluding Standard Administrative Arrangements with contributors.¹⁹ These arrangements have been signed with the governments of Norway and France.

The MPTF Office is also responsible for concluding Memoranda of Understanding (MoUs) with implementing organisations.²⁰ The administrative agent receives, administers and manages financial contributions, and disburses these funds to implementing organisations. It prepares and submits annual consolidated financial reports, as well as regular financial statements, for transmission to donors. So far:

- + In September 2016, an agreement was signed between the MPTF (through UNDP) and the World Bank, represented by the International Bank for Reconstruction and Development and the International Development Association. CAFI funds received by the World Bank for implementing activities in partner countries would be used in accordance with the World Bank's regulations and according to this agreement.²¹
- + In September 2015, UN Organisations (including the Food and Agriculture Organisation and UN Habitat) signed an MoU with UNDP regarding the operational aspects of the CAFI MPTF.
- + Specific MoUs called "Administrative Support Services Agreements" have been signed between UNDP, several International Cooperation Agencies (ICAs) and NGOs that have been entitled to receive funding from the CAFI Fund.

So far, through CAFI, Letters of Intent have been signed for the following countries and respective amounts: DRC, US\$200 million, Republic of Congo, US\$65 million and Gabon, US\$150 million.

TABLE 2: PROGRAMMES AND PROJECTS FUNDED BY CAFI MPTF AS OF JANUARY 2020

Country	ICA	Programme approved (budget)	Start ²² date
Democratic Republic of the Congo	JICA	PIREDD Kwilu (US\$7,000,000)	December 2018
	ENABEL	PIREDD Mongala (US\$7,000,000)	Aug 2019
	AFD	Plateforme pour la Gestion Durable des forêts (PGDF (US\$12,000,000)	N/A (the project was approved in Dec. 2019)
	AFD	Savannahs and degraded forests (US\$15,000,000)	N/A (the project was approved in late 2019)
	Total AFD	<i>US\$27,000,000</i>	
	UNDP	Support to civil society (US\$3,000,000)	December 2016
	UNDP	PIREDD Oriental (US\$33,000,000)	November 2017
	UNDP	Support to land-use planning reform (US\$4,000,000)	April 2017
	UNDP and UNCDF	Sustainable use and substitution of wood energy (US\$15,000,000)	December 2018
	UN Habitat	Support to tenure reform (US\$7,000,000)	April 2017
	FAO	Finalisation and operationalisation of the National Forest Monitoring System (US\$10 000 000)	December 2016
	FAO	Sustainable Agriculture (US\$3,000,000)	April 2019
	FAO	PIREDD Equator (US\$6,000,000)	August 2019
	UNOPS	Family Planning ²³ (US\$8,000,000)	July 2019
	Total UN Organisations	<i>US\$89,000,000</i>	
	World Bank	Sustainable management of forests by Indigenous People (Pygmies) (US\$3,000,000)	April 2017
	World Bank	PIREDD Sud Ubangi (US\$7,000,000)	April 2017
World Bank	PIREDD Mai Ndombé (US\$30,000,000)	April 2017	
Total World Bank	<i>US\$40,000,000</i>		
Total allocated to DRC: US\$170,000,000			
Republic of the Congo	FAO	Proposal to Green Climate Fund (US\$300,000)	July 2019
Total allocated to Republic of Congo: US\$300,000			
Republic of Gabon	AFD	National land-use planning and forest observation to promote sustainable development strategies in Gabon ²⁴ (US\$18,000,000)	July and August 2018
Total allocated to Republic of Gabon: US\$18,000,000			
Republic of Cameroon	World Bank and AFD	Cameroon's National Investment Framework (US\$1,000,000)	September 2016
Total allocated to Republic of Cameroon: US\$1,000,000			
Central African Republic (CAR)	World Bank	CAR National Investment Framework (US\$1,000,000)	September 2016
Total allocated to CAR: US\$1,000,000			
Republic of Equatorial Guinea	FAO	Equatorial Guinea National Investment Framework (US\$1,087,000)	December 2016
Total allocated to Republic of Equatorial Guinea: US\$1,087,000			
Total allocated to Central African Countries: US\$191,387,000			

The CAFI Executive Board

The CAFI Executive Board is the entity through which funding allocation decisions are made – during meetings or between sessions – to support the development and implementation of country REDD NIFs. Donor governments and other entities that have signed the CAFI Joint Declaration and have financially contributed (or intend to contribute) to the CAFI Fund are eligible to be members of the Executive Board.²⁵ The current board members are:

- + Norway
- + France
- + The United Kingdom
- + Germany (currently Chair, as of 1 January 2020)
- + The European Union
- + The Netherlands
- + South Korea

- + UNDP, on behalf of the UN Implementing Organisations, with voting rights on all matters except fund allocation decisions
- + The UN Multi-Partner Trust Fund (ex-officio).

The CAFI Secretariat

The Secretariat function is provided by UNDP, which means its staff fall under UNDP rules and policies. The Secretariat supports the Executive Board and facilitates overall operations of the fund.

The Secretariat is a light structure acting as the central point of contact for CAFI and coordinating with countries with regards to the different submission and reporting processes. It provides the Executive Board with advice and support with strategic planning, and consolidates narrative progress reports, using tools such as a monitoring and evaluation (M&E) scorecard and a risk management dashboard.

CAFI PROJECT MAP

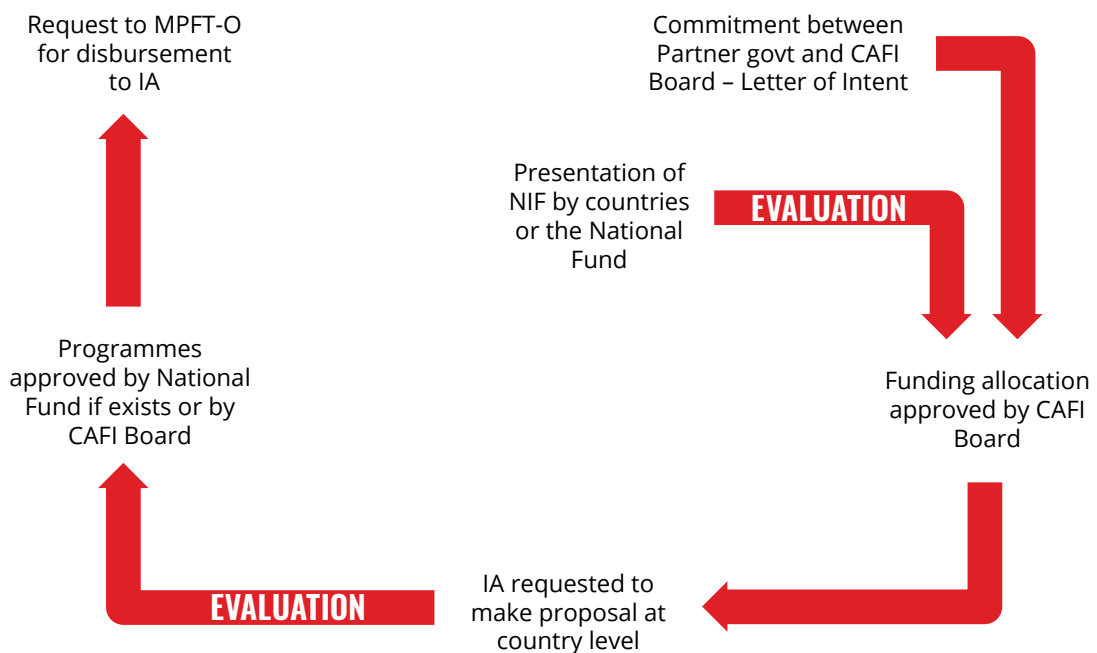


Figure 1

FONAREDD

In 2012, the DRC government decided to set up a financial instrument, Fonds National REDD+ (FONAREDD), to ensure the deployment of the REDD+ investment phase starting from 2013. UNDP was requested to assist the process and to provide fiduciary management services through the MPTF Office. UNDP was also responsible for developing the capacities of the Congolese administration which will eventually be in charge of FONAREDD.

Further information can be found in the FONAREDD Operating Manual.²⁶

The Steering Committee

The Steering Committee is FONAREDD's guiding and decision-making body. It is composed of 13 members:

- + six government representatives
- + two donor representatives
- + two civil society representatives (including one from the indigenous people)
- + one private-sector representative
- + the United Nations Resident Coordinator
- + a representative of the partners²⁷ of the REDD+ process in DRC.

The main responsibilities of the Steering Committee are to:

- + guide and promote, within the framework of the establishment of the National REDD+ Fund, operationalisation of the fund
- + adjust the fund's strategic orientations on a regular basis
- + ensure that the fund is properly managed in accordance with the established rules of procedure
- + conduct a final review of financial and technical proposals for approval and disbursement authorisation
- + validate the reports of funded REDD+ programmes.

The Technical Committee

The Technical Committee is a specific entity dedicated to the review of investment plans, the review and validation of REDD+ programme proposals and the validation of M&E reports of REDD+ programmes. It maintains consistency between the REDD+ features: programme criteria, safeguards and the complaint management mechanism; Measurement, Reporting and Verification,²⁸ and Free, Prior and Informed Consent.²⁹ It conducts systematic evaluations of programme proposals and provides a report with recommendations to the Steering Committee for final approval. It also provides opinions and recommendations to the Steering Committee on all M&E reports and other specific technical issues related to REDD+.

The Technical Committee is composed of a maximum of 11 members from the following organisations and administrations:

- + a representative of the Ministry of the Environment (Coordinator)
- + a representative of the Prime Minister's Office (Vice-president)
- + a university expert
- + a civil society expert
- + two experts made available by the donors
- + an expert from the UN-REDD+ Programme
- + an expert from the World Bank (as an implementing partner of the Forest Carbon Partnership Facility (FCPF))
- + two independent experts
- + a representative of the Executive Secretariat of FONAREDD.

FONAREDD PROJECT MAP

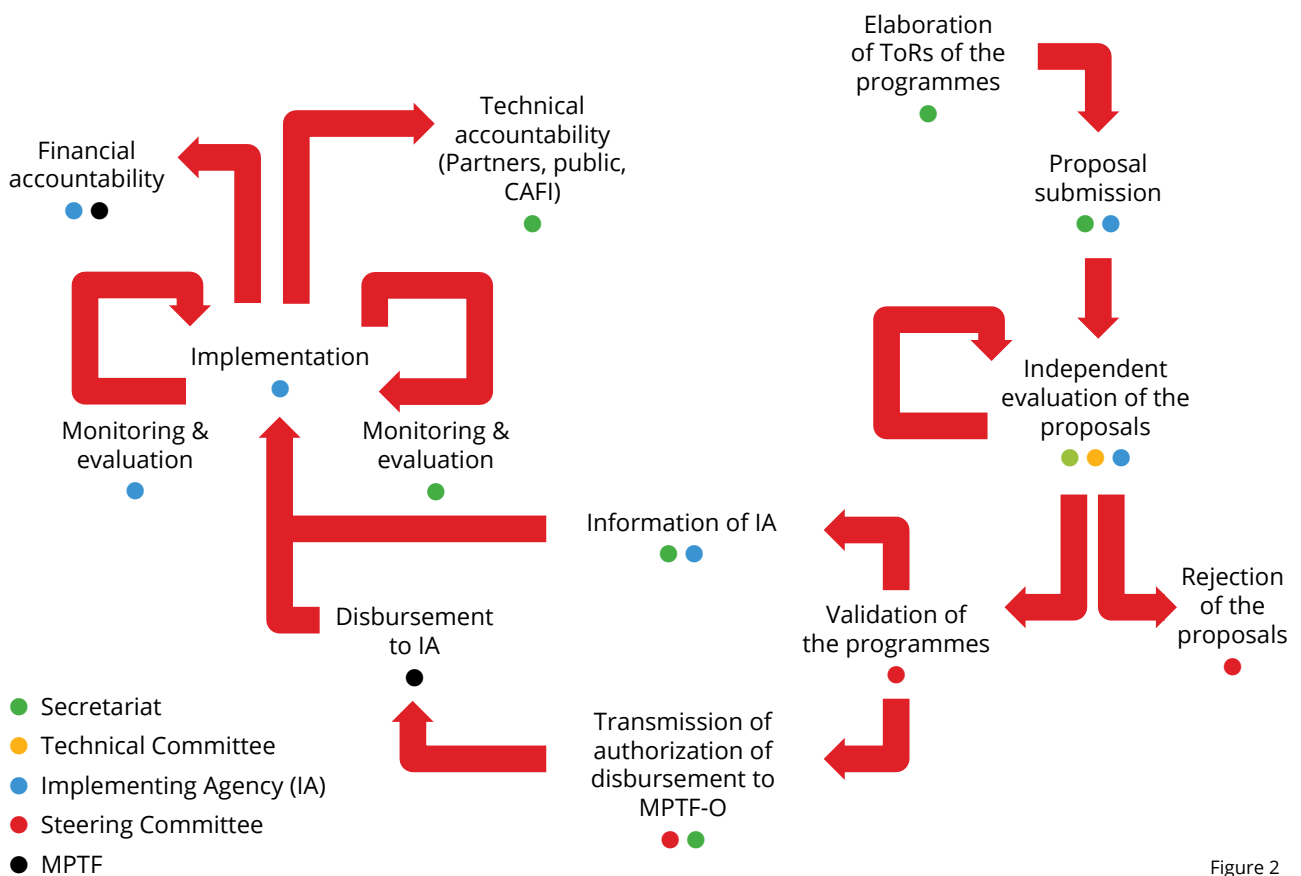


Figure 2

The FONAREDD Executive Secretariat

The FONAREDD Executive Secretariat is the national structure in charge of coordinating and managing the day-to-day activities of the fund. Through external and independent expertise (including a secondment from UNDP), it supports the tendering process and advises the Technical and Steering Committees on evaluations of project proposals. It is in charge of planning, programming, monitoring and evaluating the fund's programme and project portfolio.

The implementing agencies

The implementing agencies are the entities that will potentially be financed by the fund to implement a REDD+ programme or project. They are classified into two categories:

- + Those with direct access to the CAFI fund through the Administrative Agent and the MPTF (UN organisations, ICAs, International NGOs)
- + Those with direct access to other REDD+ funds (Congolesse CSOs, private-sector entities)

The programmes

See relevant programmes under the DRC heading, Table 3, page 19.

ACCOUNTABILITY AND DECISION-MAKING MAP

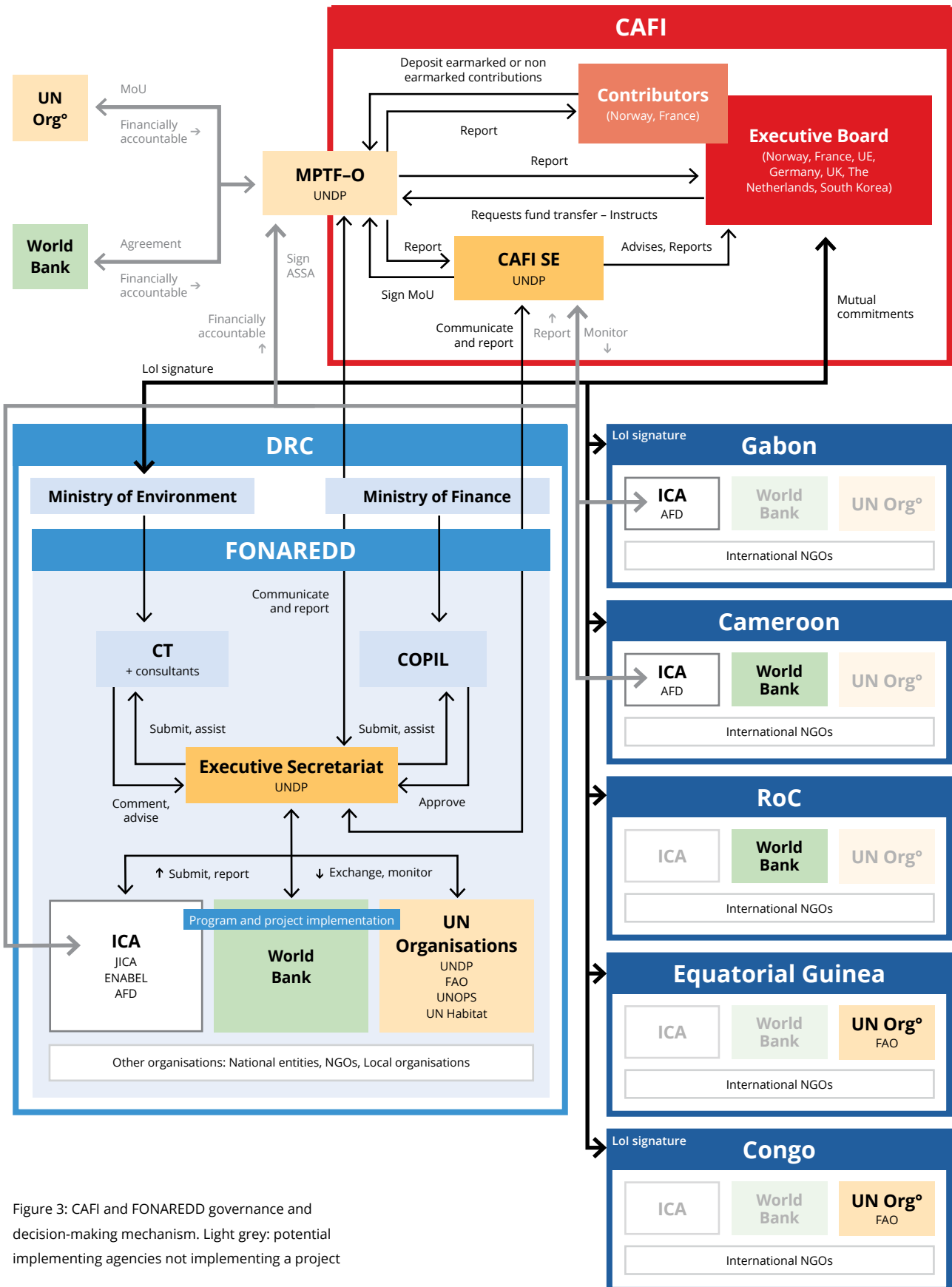


Figure 3: CAFI and FONAREDD governance and decision-making mechanism. Light grey: potential implementing agencies not implementing a project

METHODOLOGY

CAFI and FONAREDD policies and practices were analysed against the following transparency and anti-corruption indicators:

- + Policy-level transparency
- + Practice-level transparency
- + Financial reporting and audits
- + Accountability mechanisms
- + Whistleblower protection
- + Complaints and investigation mechanisms, sanctions
- + Civil society consultation
- + Observer participation
- + Anti-corruption rules
- + Integrity screenings and integrity training.

The study involved desk research and interviews with the CAFI and FONAREDD Secretariats, the MPTF Office, CAFI Executive Board members, FONAREDD governance body members (Secretariat, Technical and Steering Committees), DRC administrations, International NGOs, CSOs and implementing agencies (see Annex 4 for stakeholder organisations contacted). Peer reviews were further engaged to validate or question the findings.

The assessment (see Section 5) was conducted by answering scored guiding questions through reviews of available documents, as well as interviews. These are summarised in Annex 3. The analysis presents ratings for transparency, accountability and integrity, for both CAFI and FONAREDD (but independently of one another³⁰). Performance is rated as **weak** (indicating lack of policies and insufficient practices), **average** (demonstrating that policies and practices exist, but improvements are needed), or **strong** (signalling the sufficient implementation of adequate policy and practices). Gradations in between indicate that certain indicators fall between categories, with **below-average** scores and **above-average** scores.

The assessment was conducted between 1 December 2019 and 30 January 2020. The availability of documents was assessed during this period. This does not preclude their availability outside this period.



FULL FINDINGS AND RECOMMENDATIONS

CAFI

Measured against Transparency International series of benchmarks for climate funds³¹, CAFI's performance in terms of its policies and practices in relation to transparency, accountability and integrity is found to be generally average. Weaknesses exist in certain areas, notably opportunities for civil society and citizen participation, as well as the strength of anti-corruption rules and compliance with them. Other shortcomings include the need for more robust accountability mechanisms and for consideration of external corruption risks. Like other climate investment funds, CAFI should commit to a fund-wide policy of zero tolerance towards corruption and improve access to information.

The multiplicity of actors within CAFI and the resulting complexity and gaps in policy (such as unclear reporting and overlapping mandates) is a critical problem that should be tackled immediately. This is related to the fact that CAFI is an overarching vehicle representing the interests of distinct parties. There are many competing policies in place, as well as concurrent potential conflicts of interest among its constituent members, and it is not always clear which policy should take precedence. Nor are the interests of members disclosed. It should be made clear which policies overrule all others. A distinctive CAFI policy should be made available.

TABLE 3: SUMMARY OF CAFI'S ASSESSMENT PERFORMANCE

TRANSPARENCY	PERFORMANCE
Indicator (1.1): Policy-Level Transparency	Above average
Indicator (1.2): Practice-Level Transparency	Above average
ACCOUNTABILITY	PERFORMANCE
Indicator (2.1): Financial Reporting and Audits	Average
Indicator (2.2): Accountability (Answerability) Mechanisms	Below average
Indicator (2.3): Whistleblower Protection	Below average
Indicator (2.4): Complaints and Investigation Mechanisms	Weak
Indicator (2.5): Sanctions	Below average
Indicator (2.6): Civil Society Consultation	Below average
Indicator (2.7): Observer Participation	Weak
INTEGRITY	PERFORMANCE
Indicator (3.1): Anti-corruption Rules	Below average
Indicator (3.2): Integrity Screenings	Average
Indicator (3.3): Integrity Training	Average

Finding 1: Lack of a CAFI-specific transparency policy

CAFI does not have its own transparency policy and procedures, and relies on UNDP's own policy on transparency. All CAFI Executive Board members that also act as implementing agencies (such as the French Development Agency or UNDP, as well as the World Bank and the Food and Agriculture Organisation (FAO) in their role as observers) have put in place robust transparency mechanisms. These transparency procedures are available online on each of the organisations' websites and provide the necessary information on transparency systems. However, the multiplicity of transparency and accountability systems and the lack of centralised access to the procedures established by different organisations contributes to systemic opacity in the use of CAFI funds. Appropriate reform would make the system much more transparent.

Recommendation 1

CAFI should have an overarching information disclosure policy that is clear and readily available, and provides web links to the existing procedures of its development partners, including the UNDP, World Bank and international cooperation agencies. This policy should cover all information, decisions and reports produced by the Executive Board, the Secretariat and the in-country programmes.

Finding 2: CAFI documentation (including financial reports) is not consistently available on the website

The CAFI website is not always up to date regarding decisions, meetings and reports relevant to fund activities in the DRC. While some links redirect users to the FONAREDD website for current information, there are inconsistencies between the two websites, as some documents are available on only one.

For example, the results of the independent verification of the DRC Letter of Intent milestones completed in early November 2019 were only made available in mid-January 2020.³² In addition, the French version of the CAFI website is not updated as frequently as the English version, hindering Congolese civil society's ability to scrutinise the programme.

Comprehensive financial audits of implementing organisations are difficult to obtain and no detailed, disaggregated data on disbursements is made available either on CAFI's website or the MPTF website, which displays only consolidated information. This severely impedes the oversight ability of external actors, such as civil society groups, citizens and other project partners. Some partner country stakeholders, such as CSOs and administration representatives, point out the absence of transparency when it comes to project-level finances and express their desire to receive more information about fund transfers to the implementing agencies, to enable better monitoring of project activities.³³ On the MPTF Office's website, access to service agreements and MoUs with participating organisations is only available on request.

Recommendation 2a

CAFI should strengthen its commitment to improving transparency by:

- + **Making all information on projects available on its website – in both English and French. This information could encompass ex-ante project evaluations, environmental and social impact assessments, and ex-post evaluations. In addition, disclosure could include a detailed project description, stakeholder engagement efforts, monitoring reviews and the address of a country office where project documentation can be consulted.**
- + **Adopting country-by-country reporting standards for its investments, listing taxes paid, employees, assets, investors and investees' names, type and amount of investment, and number and nature of complaints received. Proactive disclosure of this information will facilitate oversight on the part of civil society and reduce the risk of corruption.**
- + **Enabling full online access to audit and evaluation reports that have been produced but not yet published**
- + **Updating its website regularly by making further information available in a reasonable timeframe, such as audits, evaluations and information on funding (or at least redirecting users to the MPTF website).**

- + **Uploading relevant documents as soon as possible within a reasonable timeframe, such as a maximum of two weeks after their finalisation.**

Recommendation 2b

On CAFI and MPTF websites, MoUs, agreements with partner organisations and detailed financial information on programmes – beyond aggregated data – should be made readily available. Access to MPTF information about CAFI’s programmes is not intuitive and should be made easier. The CAFI webpage could allow direct access to in-country programme information without scrolling through several other pages.

Finding 3: Lack of access to CAFI reports on decision-making meetings

All decisions made by the CAFI Executive Board are available on the CAFI website. Beside the Board members and observers officially accredited according to the CAFI Terms of Reference, no external third party is allowed to participate in the board meetings, although ad hoc observers may be invited on request. No minutes are taken during the meetings. Decision reports are short and do not provide background information about the discussion that preceded the decision. As there is no explanation on how and why the Board took a decision, the absence of minutes of board meetings undermines the transparency and perceived impartiality of fund operations.

Recommendation 3

After each board meeting, minutes should be prepared by the CAFI Secretariat and published on CAFI’s website in order to give non-observers the opportunity to comment on decisions made. In instances in which CAFI decides not to disclose information on board discussions, these exceptions should be clearly justified. CAFI’s Terms of Reference would need to be amended by inserting the exceptions to information disclosure. If observers participate, the list should be published.

Finding 4: A complex formal complaint mechanism

CAFI’s Terms of Reference do not provide for procedures to appeal decisions taken by the CAFI Board. To lodge a complaint about board decisions or CAFI operations, the formal procedures oblige the complainant to use arduous UNDP mechanisms. This could largely explain why this formal mechanism is not used. Rather, national and international NGOs have raised concerns about serious forest governance issues directly with the CAFI Board and Secretariat over the past few years.³⁴

Recommendation 4

CAFI should establish clear grievance channels and accountability mechanisms to allow complainants to file an appeal. This mechanism could replace or give easier access to the complex UNDP appeal procedures and be made available on the CAFI website. The CAFI Secretariat should also establish a complaints register and maintain it in real time. For guidance, the Secretariat could usefully refer to Transparency International’s reference guide on complaint mechanisms.

If CAFI’s having its own mechanism might conflict with agreements made with the participating agencies, it is recommended that CAFI establish a webpage summarising implementing agencies’ policies and procedures regarding complaints and investigations in an accurate, comprehensive and accessible way. This should be done as soon as possible.

Finding 5: Lack of a CAFI-specific whistleblower protection mechanism

While all CAFI’s implementing organisations have established whistleblower protection mechanisms, CAFI itself is silent on requirements for whistleblower protection throughout its project and programme implementation. No information is available at CAFI level to indicate that whistleblowers would enjoy protection. Both the CAFI website and CAFI staff interviewed for this report only referred to UNDP’s whistleblower policy, which applies to CAFI staff only and not to other implementing agency staff.

Although implementing organisations such as UNDP, the World Bank and the French Development Agency have some level of whistleblower protection measures in place, the links between these mechanisms and CAFI are not clear. It is also not evident what real protection is granted to other whistleblowers throughout CAFI Fund operations, particularly downstream, for project staff and affected communities at partner country level, where corruption is more likely to occur.

Recommendation 5

The CAFI Secretariat should clarify which whistleblower protection mechanisms are available to different stakeholders and facilitate access to existing UNDP (and implementing agency) whistleblower protection mechanisms, be these for staff at the CAFI Secretariat or country-level project staff. In addition, it should develop a CAFI-specific whistleblower protection mechanism that should be disclosed on the CAFI website.

Finding 6: Lack of CAFI-specific sanction mechanisms

Each of CAFI's participating organisations has its own sanction mechanisms (for any kind of general wrongdoing, including corruption). However, there is no clear provision on how and by whom sanctions would be enforced if any case of corruption or fraud were to be uncovered in CAFI operations at the local level. CAFI should consider developing a similar approach to the World Bank's investigatory and sanctioning processes, which resemble a judicial model, involving a two-tier review process by independent bodies, the publication of decisions, and development of a sanctions "jurisprudence".³⁵

Even though CAFI establishes strong safeguards to reduce the risk that funds are lost to corruption, it is unclear what sanctions would be possible if a programme or project undertaken by one of the implementing agencies was not delivered or was completed to a sub-standard quality, or if funds were misappropriated. There is no clear provision for what would happen in those cases and how far the implementing agency would be accountable.

Recommendation 6a

More information needs to be provided on what sanctions and enforcement capacities are available to CAFI and implementing agencies at the national level. This kind of instrument must be disclosed on CAFI's website for accountability purposes, and could also potentially act as a deterrent to corrupt acts.

Recommendation 6b

Agreements and MoUs with the World Bank and international cooperation agencies should be revised to insert clauses that make these bodies liable in cases of corruption related to a project they are managing.

Finding 7: Need for improved civil society and observer participation

At CAFI level, CSOs and IPs are not allowed to attend Executive Board meetings, even as observers, unless they are invited to participate in ad hoc sessions and bound by non-disclosure agreements. The CAFI Declaration, which established the initiative, does not place much importance on civil society consultation. This is illustrated by the fact that although civil society representatives are occasionally invited to ad hoc in-country sessions, civil society groups are not permitted to act as permanent observers at Executive Board meetings. This is of concern given that other climate funds such as the Green Climate Fund grant civil society representatives greater opportunities to observe proceedings.

For national programmes directly managed by the CAFI Secretariat, there is a robust requirement for stakeholder consultation during programme preparation and implementation. This seems to be largely adhered to by the implementing agencies.³⁶ However, there are no provisions in place to govern what would happen in cases of their non-compliance. This is particularly problematic when the implementing agencies also perform other functions in the CAFI structure – increasing the risk of conflicts of interest. There is also no monitoring framework to ensure that consultations actually result in meaningful participation.

Recommendation 7a

CAFI internal procedures should be improved to give greater space to civil society and IP observers in fund discussions at board level. In instances where it is not possible for civil society representatives to be “active observers” who can participate in the Board’s decision-making procedure, then they should at least be “passive observers”, able to report on the process to affected stakeholders.

Recommendation 7b

Agreements and MoUs with the World Bank and international cooperation agencies should be amended to expand the scope of civil society consultation, as well as establish a monitoring framework to ensure this translates into meaningful participation. There should also be clear provisions for what should happen where civil society groups and affected communities are not consulted by agencies implementing projects or programmes.

Finding 8: Conflicts of interest

There is a major flaw in CAFI’s decision-making chain, in that UNDP faces significant conflicts of interest, given its triple role as i) the manager of CAFI MPTF ii) a member of the decision-making body, and iii) an implementing agency (and, in DRC, the manager of FONAREDD).

Existing safeguards are limited to one article of the rules and procedures of CAFI’s Executive Board,³⁷ which states that the Board may request a board member to recuse themselves from any deliberation, discussion and/or decision on a national programme in which they are involved as an implementing agency. This is supposed to ensure that the board member may not use their voting rights when decisions are being made about projects where they act as implementing agency. However, this provision does not make it compulsory for board members to recuse themselves where a potential conflict of interest may arise. This is a major shortcoming in CAFI’s governance framework, leaving room for possible conflicts of interest in decision making.

In addition, CAFI does not require any provision for integrity screening or due diligence for members of national bodies involved in the decision-making process.

Recommendation 8a

Several actions could address this issue:

- + **CAFI could make it clear that UNDP is only permitted to participate in Executive Board meetings as an active observer, removing its right to vote on decisions.**
- + **In-country programme allocation to UNDP could be suspended or, at the very least, subject to additional scrutiny.**
- + **Any board member involved in a country programme could be automatically prohibited from participating in discussions and decisions about that programme.**
- + **As in recommendation 3, taking and circulating minutes of Executive Board debates or opening board meetings to external stakeholders would improve transparency and provide an additional layer of oversight. This could act as a brake on potential conflicts of interest.**

Recommendation 8b

A clear statement should be added to the CAFI website to the effect that integrity screening and due diligence are a requirement for any actors seeking to engage the fund, especially recipients of finance from the fund. Declarations of potential conflict of interest should also be published.



photo: MONUSCO/ Myriam Asmani

FONAREDD

FONAREDD performs generally well for transparency and accountability. However, it lacks a strong anti-corruption and integrity policy at the fund level.

UNDP regulations govern FONAREDD operations. In the long run, when national fiduciary management

capacities meet international standards, the DRC national administration will take over the management of FONAREDD. In the meantime, there is need for FONAREDD to develop its own anti-corruption policies independent of UNDP, so it can fully play its role as a competent fund manager.

TABLE 4: SUMMARY OF FONAREDD'S ASSESSMENT PERFORMANCE

TRANSPARENCY	PERFORMANCE
Indicator (1.1): Policy-Level Transparency	Above average
Indicator (1.2): Practice-Level Transparency	Average
ACCOUNTABILITY	PERFORMANCE
Indicator (2.1): Financial Reporting and Audits	Average
Indicator (2.2): Accountability (Answerability) Mechanisms	Above average
Indicator (2.3): Whistleblower Protection	Below average
Indicator (2.4): Complaints and Investigation Mechanisms	Above average
Indicator (2.5): Sanctions	Below average
Indicator (2.6): Civil Society Consultation	Above average
Indicator (2.7): Observer Participation	Above average
INTEGRITY	PERFORMANCE
Indicator (3.1): Anti-corruption Rules	Below average
Indicator (3.2): Integrity Screenings	Average
Indicator (3.3): Integrity Training	Below average

Finding 9: Conflicting transparency policies between FONAREDD and implementing agencies

FONAREDD has developed a comprehensive set of procedures on information disclosure. However, these measures sometimes come into conflict with implementing agencies' own procedures, which, according to the agreements signed with the MPTF, have priority over FONAREDD's policies. In other words, if an implementing agency decides in accordance with its policy not to publish project documents (such as Steering Committee reports), FONAREDD has no means of access to this information and cannot object to that decision.

Recommendation 9

As a national fund, FONAREDD should work at developing its own transparency policies by complementing the MoUs and the agreements between MPTF and implementing agencies with additional transparency mechanisms. A renegotiation of the agreement on this matter between the DRC's Ministry of Finance and MPTF could enable a FONAREDD transparency policy to take precedence over any other policy.

Finding 10: Delays in updating the FONAREDD website

Most internal documents related to FONAREDD's activities can be found on its website. These include FONAREDD's annual report, social and environmental safeguarding standards,³⁸ Steering Committee reports and most of the Technical Committee's reports (although Reports 1 to 6 are missing). However, several inconsistencies have been observed, as well as delays in keeping the FONAREDD website up to date. There are also inconsistencies with information available on the CAFI website.

Recommendation 10

The FONAREDD website should be more regularly updated. Careful attention should be paid to the dead links that are supposed to redirect users to existing documents.³⁹

Finding 11: Lack of specific FONAREDD whistleblower protection and anti-corruption mechanisms, in line with Finding 5 above:

In terms of anti-corruption rules, as well as of integrity screenings, due diligence and integrity training, there is a worrying discrepancy between the FONAREDD Secretariat and the Steering and Technical Committees. While FONAREDD Secretariat staff fall under UNDP rules of "zero tolerance for fraud and corruption", there are no defined FONAREDD rules for committee members (other than the signature of a declaration of impartiality and confidentiality). This means that in a context like the DRC, in which corruption is widespread,⁴⁰ little thought seems to have been given to preventing corruption at committee level through the establishment of anti-corruption rules, integrity screening and training.

There is also no clarity on how FONAREDD would act to protect a DRC administration officer revealing corrupt activities in relation to FONAREDD programmes.

Recommendation 11a

There should be a commitment to zero tolerance for corruption and FONAREDD should establish clear codes of conduct setting out ethical and anti-corruption rules and standards. All committee members should pledge not to engage in corruption and to declare potential conflicts of interest, undergo screening for past wrongdoing and receive mandatory integrity training.

Recommendation 11b

FONAREDD should include its own whistleblower protection system as part of the broader anti-corruption mechanism detailed above.

Finding 12: A civil society consultation system which could be improved

FONAREDD has produced a road map for transparent and effective participation throughout the whole project management cycle (elaboration of Terms of Reference, tendering process, attribution phase and project implementation). Despite considerable civil society involvement in the development of a civil society participation manual, it remains unclear how this is used and complied with by implementing agencies in FONAREDD projects. In addition, there is no effective control of adherence to the participation guidelines: FONAREDD's role is in fact extremely limited, making the overall assessment of effective participation more difficult.

Recommendation 12

FONAREDD should increase its funding support to enhance civil society participation during programme implementation. It should also develop a comprehensive monitoring mechanism to assess how implementing agencies facilitate civil society consultation and participation, and Free, Prior and Informed Consent requirements while executing fund projects.

Finding 13: The need for a more transparent decision-making process

Some stakeholders point out the strong influence of CAFI on FONAREDD bodies, which might alter decision-making capacity at FONAREDD level and transparency in allocating resources.

Recommendation 13

FONAREDD's decision-making bodies (the Technical and Steering Committees) should operate openly and transparently. The debates leading to decisions should not reflect CAFI's agenda only, but also the country's interests. There is an urgent need to find common ground on which consensual decisions could be made.



photo: UNESCO / Wikimedia

THE ASSESSMENT

In this section, the main findings of the assessment are set out under each of the three criteria. The specific performance is reflected by the colour scale. The assessment process is further detailed in “Global Climate Finance: A Governance Risk Assessment Toolkit” (accessible upon request) and summarised in Annex 3 of this report.

CAFI

Transparency

Overview of the Transparency Performance Assessment

TRANSPARENCY	PERFORMANCE
<p>Indicator (1.1): Policy-Level Transparency. Are there policy provisions in place for public access to information regarding the funds’ administration and operations, including activities, outputs and decisions?</p>	Above average
<p>Indicator (1.2): Practice-Level Transparency. In practice, can members of the public obtain relevant and timely information on the funds’ policies, procedures, activities, outputs and decisions throughout the project cycle?</p>	Above average

The CAFI Fund is assessed as above average regarding **its policies and procedures to provide access to information**. From the outset, the CAFI Secretariat and participating donors who signed the CAFI Declaration have shown a continuous commitment to ensuring transparency in the fund operations. There is no divergence between what is set out in the policy documents and the effective access to information. However, CAFI does not have its own transparency policy and relies on the participating organisations’ own policies. This multiplicity of transparency standards makes access

to information more complicated with respect to programme implementation.

In terms of **transparency practice**, CAFI is assessed as above average, as the participating organisations establish clear guidelines for those seeking accurate, comprehensive and coherent information regarding fund programmes and projects. However, information is not fully comprehensive (some documents are not in French) and not always timely. Interested parties do not have access to the fund’s proceedings.

Analysis

Indicator (1.1)

Policy-Level Transparency

Are there policy provisions in place for public access to information regarding the Fund's administration and operations, including activities, outputs and decisions?

This general scoring question was complemented by the following specific guidance questions:

- + Do general guidelines or specific guidelines regarding public access to information/information disclosure exist? Are these guidelines publicly available?
- + Do these guidelines or any kind of open public access system apply to all phases of the project cycle (elaboration of programme Terms of Reference, programme attribution and agreement between implementing agencies and MPTF, project documents – PRODOC validation, programme reporting, disbursements, management, implementation, monitoring and evaluation)?
- + Are there deadlines for making such information available?
- + Do the provisions allow for any exemptions of information disclosure and confidentiality? If so, to what extent are these exemptions justified?
- + Do the guidelines or any kind of open public access system allow for an appeal procedure to request non-disclosed information? Are there stated deadlines for making such information available? If so, is the information available within a reasonable timeframe (20-30 working days)?

CAFI is a Pass-Through Fund⁴¹ managed by the MPTF Office hosted by UNDP. All of CAFI's management rules, including those of transparency and access to information, are those of UNDP and are publicly available.

The Standard MoU for the CAFI MPTF (between participating UN organisations and UNDP) describes in Section IX on Communication and Transparency the desire to maintain a transparent functioning of the fund in accordance with the regulations, rules, policies and procedures of the participating UN organisations.⁴² This specification is also included in the Standard Administrative Agreements⁴³ that govern the relationship between the donors and CAFI MPTF and in the agreements with international cooperation agencies. The CAFI MPTF Terms of Reference 2015-2022 and the proposed result indicators complete the fund's transparency approach.

As UNDP-dependent offices, the MPTF Office and the CAFI Secretariat must comply with the UNDP Information Disclosure Policy,⁴⁴ which sets out the following four principles: i) maximisation of access to information ii) limited exceptions to disclosure of information iii) simple and broad access to information and iv) explanations of decisions and right to review.

Beside UNDP procedures, it is stated that implementing agencies are committed to principles of transparency with regards to the implementation of the fund, consistent with their respective regulations, rules and policies.

Table 5 summarises the existing information regarding transparency policies of the various CAFI actors:

TABLE 5: TRANSPARENCY POLICIES OF CAFI ORGANISATIONS

Organisations	Transparency and access to information policy available	Clear guidelines available	Apply to all phases	Exemptions of information disclosure
UNDP and UN organisations ⁴⁵	Yes ⁴⁶	Yes – see UNDP Programme and Operations Policies and Procedures ⁴⁷	Apply to all UN programmes and projects	Yes
World Bank	Yes ⁴⁸	Yes ⁴⁹	Yes	Yes
AFD	Yes ⁵⁰	See policy	Yes	Yes
ENABEL	No ⁵¹	No	N/A	N/A
JICA	No ⁵²	No	N/A	N/A
GIZ	Yes ⁵³	Yes – see policy	Yes	Yes

Most organisations linked to CAFI programmes have clear policies regarding transparency, although some are not available online (for instance, the Belgian Development Agency (ENABEL)). Procedures are also available on the UN and World Bank websites. Exemptions of information disclosure exist in all agencies' policies and guidelines. However, these mainly apply to very specific issues such as:

- + “crisis, conflicts or humanitarian disasters that pose challenges in terms of Country Office relations with government and other stakeholders” (UNDP Information Disclosure Policy)
- + “security classification” (World Bank)
- + “confidential information covered by professional secrecy” and “protection of the public interest” (French Development Agency)
- + “sensitive and confidential information (including corporate and business secrets)” (German Agency for International Cooperation (GIZ)).

Most of these cases do not apply to CAFI programmes, although “professional secrecy” could be used to prevent information disclosure when private companies are involved in a project.

CAFI relies on the policies and regulations of its participating organisations, including the UN, World Bank, international cooperation agencies and implementing agencies. As such, it does not have its own transparency policy or procedures. Most of CAFI's participating organisations generally provide extensive public access to information and robust information transparency mechanisms. However, the multiplicity of these systems in CAFI's case can lead to confusion as to which one applies to CAFI programmes, reducing systemic coherence.

The CAFI website should provide access to information procedures and downloadable summarised guidelines for all partner agencies. This would actively contribute to improved transparency of the fund.

Indicator (1.2) Practice-Level Transparency

In practice, can members of the public obtain relevant and timely information on CAFI's policies, procedures, activities, outputs and decisions throughout the project cycle, such as CAFI Executive Board decisions or implementing agency financial and progress reports?

This general scoring question was complemented by the following specific guidance questions:

- + Is this information: freely available online (CAFI, implementing agency or MPTF website) or available on request; accurate and complete; coherent and understandable; timely and reliable within a certain timeframe or by a specific deadline if one exists, or within a reasonable timeframe if no deadline exists; regularly updated?
- + If access to information provision allows for confidentiality/non-disclosure of information, in practice are these provisions interpreted and applied with good justification with regard to the greater public interest and the right to be informed?

In terms of its transparency practice, CAFI performed well. Most policies and procedures (including CAFI Terms of Reference) are available and can be easily found on the CAFI website. All Executive Board meetings, agenda and decisions are available – but not the meeting minutes, nor information on partner country programmes and the project cycle (for instance, call for proposals, Terms of Reference, approved programmes, biannual and annual reports). The fund publishes on its website detailed information regarding its governance structure, including the roles of the different actors and a clear reporting framework. It also explains how accountability is organised within the fund. Unfortunately, CAFI has not made information available regarding the fiduciary, transparency, accountability and anti-corruption safeguards of the participating organisations.

In addition, the website is not always up to date regarding decisions, meetings and reporting in DRC, although some links redirect users to the FONAREDD website for updated information. One example is striking: the result of the independent verification of the DRC Letter of Intent milestones that was completed in early November 2019 was not made available on the CAFI website until January 2020, which generated suspicion from external actors about the effective independence of the study.⁵⁴

The database on programmes and projects funded is quite comprehensive and easily accessible through the website, enabling the public to understand the activities supported by the fund. However, there are some discrepancies between the English version of the website and the French version, as the latter is not always up to date, although decisions taken by the Executive are always translated and uploaded to the website within a few days. All CAFI partner countries are French-speaking countries (except Equatorial Guinea), therefore it should be the rule, not the exception, to have every official document in the French language. This concern was also underlined in the report on the verification of achievement of the DRC Letter of Intent milestones. Differences between the English and French translations of the Letter of Intent left room to for diverging interpretations, making it more difficult to reach a common understanding of the agreement by various stakeholders.

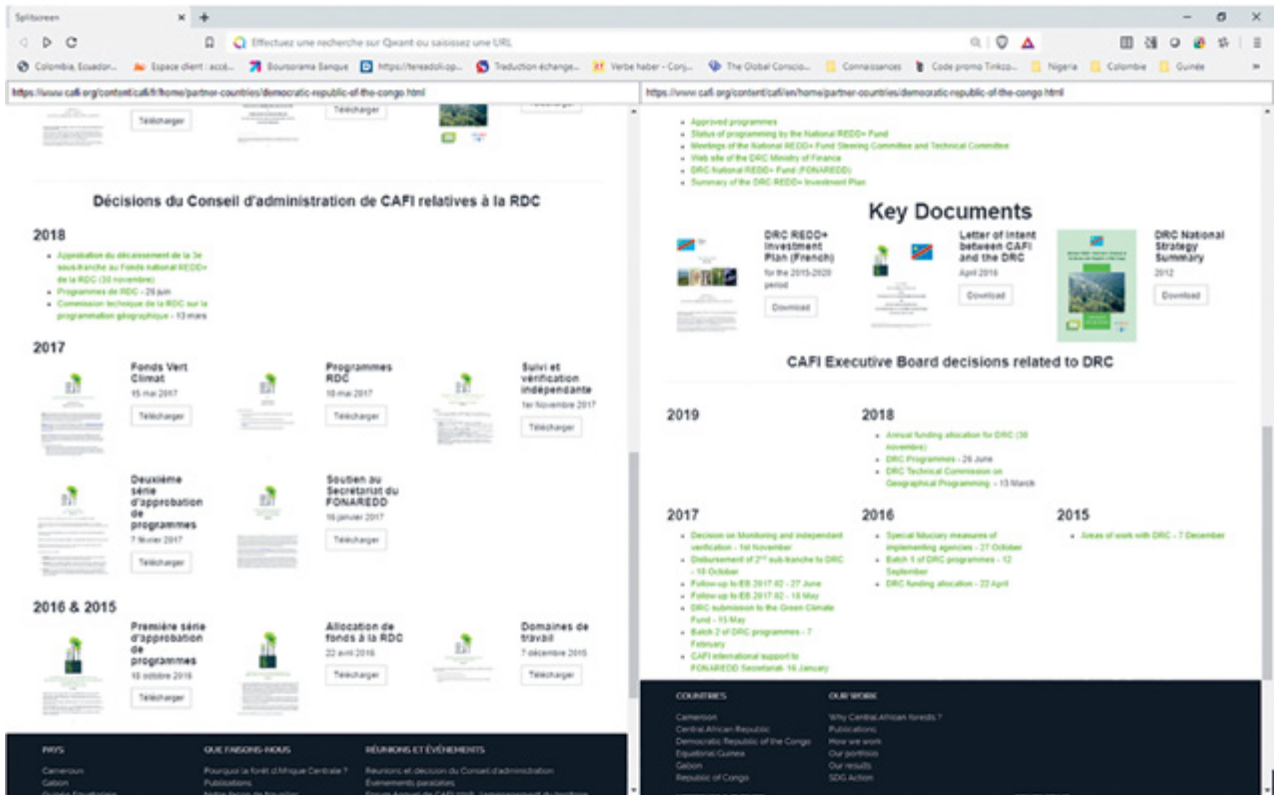


Figure 5: Screenshot of the CAFI website (DRC page) illustrating the differences between the English and French versions with respect to the availability of some documents in the French version

In order to provide administration services to CAFI, the MPTF Office has developed a public website, the **MPTF Office Gateway**, freely accessible to all. Reportedly updated in real time, the MPTF Office Gateway provides transparent and accountable fund administration services, although finding the relevant documents is not always straightforward. The gateway provides financial information on CAFI fund management, including contributor commitments and deposits, approved programme budgets, transfers to and expenditures reported by participating organisations, interest, income, and other expenses.

In addition, the Gateway provides access to key documents such as templates for service agreements, MoUs with the World Bank or Standard Administrative Arrangements. While the signed agreements are not made publicly available on the website due to security concerns, they can be accessed via the MPTF Office on request.⁵⁵ Comprehensive financial audits of partner organisations are more difficult to obtain and no detailed data on disbursements is made available. While this may be standard practice for multilateral development banks generally, it represents a gap in transparency with respect to the use of public funds.

Although consolidated financial data is provided in annual reports, some partner country stakeholders lament the lack of transparency when it comes to project-level finances. They have expressed the desire to receive more information about fund transfers to implementing agencies, to enable better monitoring of project activities.⁵⁶

Accountability

Overview of the Accountability Performance Assessment

ACCOUNTABILITY	PERFORMANCE
<p>Indicator (2.1): Financial Reporting and Audits. Does the CAFI Fund have effective financial reporting guidelines in place? Are the activities of relevant organisational decision-making bodies, such as the CAFI Board, Technical and Steering Committees, and implementing organisations subject to audits?</p>	Average
<p>Indicator (2.2): Accountability (Answerability) Mechanisms. Are CAFI's decisions governed by clear and effective accountability mechanisms?</p>	Below average
<p>Indicator (2.3): Whistleblower Protection. Throughout CAFI programme development and implementation, are there mechanisms to handle whistleblowing or the exposure of wrongdoing by CAFI or implementing agency staff, member state representatives, contractors, subcontractors and consultants?</p>	Below average
<p>Indicator (2.4): Complaints and Investigation Mechanisms. Are there independent and effective mechanisms in place to register and investigate complaints by external actors about corruption or fraud?</p>	Weak
<p>Indicator (2.5): Sanctions. Are there effective policies and procedures in place to penalise corruption and fraud?</p>	Below average
<p>Indicator (2.6): Civil Society Consultation. Is CAFI required to consult with civil society throughout the programmes' elaboration, attribution and implementation?</p>	Below average
<p>Indicator (2.7): Observer Participation. Do independent civil society actors participate meaningfully in CAFI proceedings?</p>	Weak

The CAFI Fund achieves an average performance on **financial matters**, as there are clear financial agreements between the MPTF Office and participating organisations, and regular financial reporting. However, the MPTF Office does not provide public access to implementing organisations' financial audits.

CAFI has put in place fairly robust mechanisms to ensure **accountability** throughout the process from decision making to project and programme implementation. CAFI Executive Board decisions are available, but the decision-making process remains unclear.

Protection of whistleblowers was rated below average. Even though there are provisions in place,

it is unclear whether these would effectively protect a partner country administration officer.

Although **appeal mechanisms** exist through UNDP procedures, they are complex and cannot address Executive Board decisions efficiently. CAFI has not established its own complaint mechanism and does not provide information on the procedures on its website.

While each of CAFI's participating organisations has its own **sanctions** mechanism, there is a lack of clarity as to how sanctions would be enforced if any case of corruption or fraud was uncovered at the local level.

In terms of the **civil society consultation** process, CAFI is given a below-average rating. Despite

weaknesses at fund level to adequately consult stakeholders and address their concerns, the fund is making some efforts to take into consideration recommendations from civil society. This is more easily observable at the local level (DRC is treated in a separate section).

On **observer participation**, CAFI's performance is rated weak, as there is a lack of space given to observers. This is considered a major concern, as it is far from being in line with other climate fund requirements.

Analysis

Indicator (2.1) Financial Reporting and Audits

Does the CAFI Fund have effective financial reporting guidelines in place? Are the activities of relevant organisational decision-making bodies such as the CAFI Board, Technical and Steering Committees, and implementing agencies subject to audits?

This general scoring question was complemented by the following specific guidance questions:

- + Are the executive agencies required to submit financial reports to MPTF and CAFI? If so, how often?
- + What types of expenditure are required to be documented in these reports?
- + Are there mechanisms in place to vet the validity of any financial reports?
- + In practice, are there examples of inadequate or fraudulent financial reports being filed from the CAFI Fund?
- + How often are audits required to be conducted?

- + What activities do these audits cover?
- + Are they performed by internal auditing bodies or external agencies?
- + Are the results of audits available to the public?

The MPTF Office is managing more than 80 Multi-Partner Trust Funds. As such, it has a comprehensive package of provisions already in place to ensure sound financial management.⁵⁷

All CAFI MPTF-supported programmes managed by implementing agencies (including the CAFI Secretariat, hosted by UNDP) must report to MPTF Office on an annual basis.⁵⁸ Other UN agencies report on their expenditures in real time. However, the financial reports submitted by the agencies cannot be found on the MPTF website. Consolidated information is available, although not easy to find. The CAFI Secretariat is the only UNDP-managed CAFI project that provides detailed financial data.⁵⁹ All financial data should be disaggregated in the same way.

All MoUs, Administrative Support Service Agreements and agreements with implementing agencies clearly state that the activities of the organisations "in relation to the Fund will be exclusively audited by their respective internal and external auditors in accordance with their own financial regulations and rules".⁶⁰ This system adds to the complexity of accessing the audit documents unless via sustained research with organisations, even though the agreements mentioned above indicate that "corresponding external and internal audit reports will be disclosed publicly". It seems that the state of restriction to the public disclosure of the reports ("unless the relevant policies and procedures provide otherwise") is the rule rather than the exception.

According to all interviewees (including CSO and NGO representatives), there do not seem to be any examples of fraud or biased financial reports. It is certain that the highly secure procedures implemented by the various organisations eligible for CAFI funding (including direct management for the programmes implemented in DRC) add financial safeguards.

FIGURE 6: EXAMPLE OF FINANCIAL DATA CONSOLIDATED BY MPTF OFFICE (PIREDD MAÏ-NDOMBÉ – DRC)

Data as of 18 Dec 2019; All amounts in US\$; Project Programme Integre REDD+ du Mai

Account	Approved budget (real-time)	Net Funded Amount (real-time)	Transfers (real-time)	Refunds (real-time)	Expenditure (annual)	Delivery rate (annual)
Approved Budget	30,000,000	0	0	0	0	0.00%
UNDG 3.4 Contratual Services	0	0	0	0	1,875,442	0.00%
UNDG-2.0 Indirect costs	0	0	0	0	910,879	0.00%
UNDG-Joint Prog Expend-Transf	0	20,000,000	20,000,000	0	0	0.00%
Totals	30,000,000	20,000,000	20,000,000	0	2,786,321	0.00%

**Indicator (2.2)
Accountability (Answerability)
Mechanisms**

Are CAFI's decisions governed by clear and effective accountability mechanisms?

This general scoring question was complemented by the following specific guidance questions:

- + How balanced and transparent is the fund finance mechanism? Do the stakeholders have a clear understanding of how the fund works?
- + Is CAFI required to explain its decisions to relevant external actors?
- + Are the decisions of the fund subject to timely and enforceable review?

- + Are explanations of decisions provided to applicants in a predictable and timely fashion?
- + Are there provisions in place detailing the procedures for affected parties to appeal contested decisions made by the fund?
- + Are those procedures publicly available?
- + In practice, how often are appeals to review decisions granted?

The financial mechanisms of CAFI MPTF are detailed in the agreements with the various partner organisations. Nonetheless, these remain complex financial procedures which are not easy to grasp and require in-depth analysis. The procedures are obscure to most, except for the financial departments of the partner organisations.⁶¹ Similarly, the CAFI MPTF procedures available on the CAFI website remain largely unknown to stakeholders. While it should be up to stakeholders to familiarise themselves with these procedures, CAFI could do a better job in facilitating this.

All decisions made by the CAFI Executive Board are available on the CAFI website. As stated in CAFI's Terms of Reference, apart from board members and

official observers, no external third party is allowed to participate in board meetings (see Indicator 2.7). Decision reports are short and do not provide information about the debates that led to the decision making. Decisions are not subject to any external review. In this context, the lack of minutes of board meetings can be perceived as a lack of transparency. Although some internal exchanges, such as strategic discussions with partner countries, may be considered too sensitive to be published, it would be a great improvement were the transparency rules prescribed by CAFI also applied to meetings of the Executive Board.

The decision adopted at the 11th meeting of the Executive Board illustrates this point. Without further explanation, the Board approved the disbursement to the DRC National REDD+ Fund of a third sub-tranche of US\$25 million that would be considered “as parallel funding in addition to CAFI’s existing unconditional commitment in the LOI [Letter of Intent]” and earmarked for the family planning programme in DRC. Although demographic growth has been identified as one of the main underlying drivers for deforestation in DRC and one of the eight expected outcomes of the Investment Plan, this decision allocates four times more budget to family planning programmes than to the land-use planning reform, considered by all DRC stakeholders as a central issue. This lack of debate – especially with DRC FONAREDD and national civil society – indicates the top-down nature of decision-making by CAFI’s Executive Board.⁶²

It is striking that there is no appeal mechanism to contest a board decision directly, other than the protracted UNDP procedures. While specific complaints can be sent to the Secretariat, which will forward them to the Executive Board for further consideration, there is no evidence so far that board decisions have been overturned or revised as a result of external demands. In addition, there is no available register of complaints.⁶³

Indicator (2.3) Whistleblower Protection

Throughout CAFI programme development and implementation, are there mechanisms to handle whistleblowing or the exposure of wrongdoing by CAFI or implementing agency staff, member state representatives, contractors, subcontractors and consultants?

This general scoring question was complemented by the following specific guidance questions:

- + Is there any official policy or system for whistleblowing or the exposure of wrongdoing? How is the policy or system enforced?
- + What are the procedures for handling disclosures from whistleblowers and other types of reports of wrongdoing?
- + Are whistleblowers protected from termination, harassment or other forms of reprisals?
- + Have whistleblowers faced adverse consequences for their actions?
- + Are there effective policies and procedures in place to penalise wrongdoing by CAFI or implementing agency staff, member state representatives, contractors, subcontractors and consultants (corruption, fraud, mismanagement, etc.)? Is a summary of received reports published, as well as actions taken?
- + Have employees, contractors and subcontractors, and independent observers, among others, reported wrongdoing? If so, what were the results of the disclosures?

Although CAFI was set up as a Multi-Partnership Trust Fund between several multilateral and bilateral development agencies, there is neither a specific fund policy nor any existing agreement between partners that requires maintaining effective whistleblower policies. Most of the partners have established

whistleblower protection,⁶⁴ but this information is not accessible through the CAFI website. Interested parties would have to scour the agencies' policies to find out what protection a whistleblower would have. This level of protection differs, from comprehensive policies (UNDP, World Bank) to less detailed ones that refer to keeping the identity of the informant secret, "to the extent possible".

When it comes to local executing agencies (other than executing agencies that are also members of CAFI's Executive Board) it becomes less clear what protection any of their staff would enjoy (see chapter 5.2.2.2), and what consequences whistleblower complaints would have, including what sanctions would be implemented.

Much more clarity is needed from CAFI on what these policies are, and how and for whom they are applied.

Indicator (2.4) Complaints and Investigation Mechanisms

Are there independent and effective mechanisms in place to register and investigate complaints by external actors about corruption or fraud?

This general scoring question was complemented by the following specific guidance questions:

- + Are the existing procedures on how external actors can lodge complaints against CAFI relevant, publicly available and operational?
- + Is there a dedicated body within the fund to handle complaints?
- + Is CAFI required to respond to complaints? In practice, how often does the fund respond to complaints about its activities or actions?

CAFI has not established its own complaint mechanism. Instead of a fund-wide mechanism, CAFI relies on UNDP and other multilateral and bilateral development agencies' own procedures to investigate

complaints made by an individual or an organisation. CAFI policy is to delegate the registration and investigation of complaints to implementing agencies whose internal procedures can officially be used by external actors. As is the case for whistleblower protection and other accountability mechanisms, there is no guidance given to implementing agencies concerning complaint registration, publication, investigation, resolution and the publication of statistics.⁶⁵

Although existing and accessible on the agencies' websites, the various complaint forms are not used by complainant parties, who prefer to personally contact board members, secretariat officers or implementing agency and local executive agency representatives directly.⁶⁶ Without a clear disclosure mechanism, this makes it even more challenging to assess the effectiveness of complaint mechanisms.

In order to make the integrity assurance system a substantive one, CAFI will need to assess the effectiveness of policies and procedures at all levels of the fund and address current weaknesses.

The CAFI website should be more explicit about how and to whom complaints should be made. It is recommended that a webpage be created, summarising policies and procedures regarding complaints and investigations by implementing agencies in an accurate, comprehensive, accessible and understandable way.

Indicator (2.5) Sanctions

Are there effective policies and procedures in place to penalise corruption and fraud?

This general scoring question was complemented by the following specific guidance questions:

- + Does CAFI have policies and procedures which require sanctions or punishments for corrupt or fraudulent behaviour or activity to be imposed and enforced at all levels of the fund and throughout the project cycle?

- + What is the scope of the policy coverage?
- + If a policy exists, to what extent has it been applied? Does the policy require that sanctions are determined in a fair and independent manner? Does the policy allow for an appeals process?
- + Is information on these policies and on sanctions imposed publicly available?

CAFI secretariat staff are UNDP employees who are subject to UNDP policies, as well as its internal investigation and sanctioning procedures for corrupt behaviour. As specified in the agreements between CAFI and the implementing agencies, the agencies' own policies apply with respect to corruption investigation and sanction procedures.⁶⁷ Each of these agencies has comprehensive corruption and fraud penalty procedures. These policies also suggest that contractors should demonstrate a reasonable level of fiduciary and anti-corruption safeguards. In relation to their projects, they also stipulate sanctions against contractors or vendors for corruption or fraud.

This information is embedded in the implementing agencies' websites, but is not readily available on the CAFI website. More information needs to be provided centrally on what sanctions and enforcement capacities exist at the CAFI level and through implementing agencies at the national level. This information should be made public and needs to be disclosed.

Even though CAFI establishes strong safeguards to ensure that funds are not lost,⁶⁸ it is unclear what sanctions would be possible if a programme or project undertaken by one of the implementing agencies was not delivered or was delivered at sub-standard quality, or if funds were lost during implementation. There is no clear provision for what would happen in those cases and how far the implementing agency would be accountable.

The list of sanctions imposed on vendors or implementing agencies is available on the websites of UNDP⁶⁹ and the World Bank⁷⁰ and can be easily accessed. Regarding bilateral development agencies, the information is less accessible, although most European countries follow the restrictive measures laid down by the UN, the EU and other international organisations. No information regarding specific sanctions imposed on local agencies implementing CAFI programmes was found on the various lists available online.

When allegations are made, there is little provision for how the organisation involved should respond to them prior to the imposition of sanctions, or how it should present its explanations. The UNDP procedures only specify that the "vendor will be given a reasonable period to respond to these allegations", without going into more detail about what "reasonable" means.⁷¹

Indicator (2.6) Civil Society Consultation

Is CAFI required to consult with civil society throughout the programme's elaboration, attribution and implementation?

This general scoring question was complemented by the following specific guidance questions:

- + Does it require the fund to actively consult with civil society regarding its decisions or actions?
- + Do the programmes or the implementing agencies have their own participatory manuals and are they implemented?
- + Are there clearly stated and enforced penalties for failures to consult with civil society?
- + In practice, how extensive are consultations between CAFI, the implementing agencies and civil society?
- + In practice, to what extent are civil society recommendations acted on?

The CAFI Declaration, which established the initiative as a collaboration between donor and partner countries, does not place much emphasis on civil society consultation, beyond a few mentions in the Terms of Reference:

- + In CAFI Fund general outcomes: "Interventions are expected to generate better governance locally thanks to green development plans developed in a participatory (including indigenous peoples) and gender equitable manner" and "the investment

frameworks are expected to be developed in a participatory and equitable manner”.

- + In all local key outcomes mentioned in the Terms of Reference and repeated in the Letters of Intent signed with partner countries: (“in a participatory and transparent manner”).
- + There are no specific penalties for failure to consult with civil society.

At CAFI level, only some of the Executive Board members signed the joint declaration. Only board members who have directly contributed to the CAFI MPTF, along with UN board members, are granted voting rights for decisions concerning the Trust Fund and its financial allocations. Civil society organisations and NGOs are not allowed to attend meetings of the Executive Board, even as observers.⁷²

Recent efforts were made to improve consultation with NGOs and civil society groups, but this is not a formal arrangement and occurs in a rather ad hoc manner. For instance:

- + A CAFI INGO roundtable on forest management took place in April 2018. However, the forum was mainly intended for exchange of ideas and lessons learned, leaving little room for stakeholder consultation to improve collaboration.⁷³
- + In April 2019, one day of the 12th Executive Board meeting was dedicated to discussions with INGOs, but no meeting minutes have been published, making it impossible to assess the impact of the consultation process. Despite the important work achieved during this meeting and the opportunity to tackle sensitive issues, the lack of a final statement and written outcomes left the INGOs with the impression of having participated in name only.⁷⁴

Although CAFI Board members seem generally receptive to civil society engagement, there is no evidence that any board decision has been revised following recommendations or comments from NGOs and other affected communities.

At the national level, implementing agencies are expected to engage with relevant domestic stakeholders, including civil society (see Section 4.2 on the FONAREDD and DRC case). This is important to ensure that projects are needs-driven and

accountable to citizens. Two cases illustrate how this operates in practice in partner countries:⁷⁵

- + In Gabon, in March 2018, a CAFI programme, called “National land-use planning and forest monitoring to promote sustainable development strategies for Gabon” was launched with the support of the French Development Agency, and approved by the Executive Board. Several consultations were carried out during the programme preparation phase, making it possible to address specific questions relating to the programme and to review its activities and budgets in coordination with Gabonese stakeholders. The programme incorporates ambitious stakeholder consultation objectives, including from the private sector and CSOs. One of the programme activities is entirely dedicated to consultation and communication with various stakeholders at national and local levels. To what extent these consultations will contribute to decision making is yet unknown.
- + In the Republic of the Congo, preparation of the REDD+ Strategy Investment Plan was carried out with the support of CAFI funding through several consultations involving numerous civil society representatives. How these consultations were taken into account and how the issues raised have been addressed in the final document is not clear as there is no formal system to engage with stakeholders.

In short, for national programmes directly managed by the CAFI Secretariat, there is a robust requirement for stakeholder consultation during programme preparation and implementation, which seems to be largely adhered to by implementing agencies.⁷⁶ However, there are no provisions in place to govern what would happen in cases of non-compliance by implementing agencies. There is also no monitoring framework to ensure that consultations result in meaningful participation. In addition, no reporting systems exist to verify that comments from civil society were taken into account in decision making.

Indicator (2.7) Observer participation

Do independent civil society actors participate meaningfully in the proceedings of CAFI?

This general scoring question was complemented by the following specific guidance questions:

- + Are members of civil society allowed to participate in CAFI board meetings or any other programme meetings?
- + If so, is that role primarily participatory or observational?
- + In practice, are members of civil society allowed meaningful access to CAFI's proceedings?
- + Which civil society actors regularly participate? How are they selected? Do they have ties to appointed members?

The CAFI Terms of Reference do not provide for civil society representatives to join Executive Board meetings, even as observers. Only the World Bank and FAO are invited to participate as observers.⁷⁷

The Executive Board may also organise specific in-country sessions, where national government, civil society, indigenous peoples and private-sector representatives are invited to discuss progress with respect to the Letters of Intent.⁷⁸ However, there are no specific timelines or session reports available on the CAFI website, which makes the assessment of CSO participation difficult.

This lack of space for observers is a major concern, as it is far from being in line with other climate finance fund^{79,80} requirements. In other funds, civil society representatives can join as “active observers” of the decision-making bodies, even if in these cases there is room for improvement. As active observers, they are able to make verbal interventions at meetings, add agenda items and recommend experts to speak on specific issues. They also receive all proposals and documents sent to committee members. Comments received from observers and other CSOs are posted on the funds' website, along with committee members' comments. These other funds also provide an orientation programme for new groups of observers to assist them in carrying out their roles and responsibilities as fund observers.

CAFI internal procedures must be improved to give better space to civil society observers in the fund discussions – if not as “active observers” who can participate in board decision-making, at least as “passive observers” who can report to outsider organisations.

Integrity

Overview of the Integrity Performance Assessment

INTEGRITY	PERFORMANCE
<p>Indicator (3.1): Anti-Corruption Rules. Does CAFI have a policy and respective guidelines that require individual employees or approved members, but also the implementing agencies and their collaborators, to be bound by an effective code of conduct which requires ethical and anti-corrupt behaviour and prohibits corrupt or fraudulent behaviour (including conflicts of interest)?</p>	<p>Below average</p>
<p>Indicator (3.2): Integrity Screenings. Are appointed members and technical staff subject to integrity screenings or background checks prior to employment?</p>	<p>Average</p>
<p>Indicator (3.3): Integrity Training. Are appointed members and technical staff trained in issues of integrity?</p>	<p>Average</p>

On **anti-corruption rules**, CAFI’s performance is below average. Existing UNDP rules are applied to CAFI Secretariat staff. Implementing organisations are requested to display a high level of awareness with regards to the risk of fraud and corruption. However, these procedures are not easily accessible on the CAFI website and the implementation of policies is not assessed. UNDP is also involved in a major conflict of interest, as it simultaneously fulfils the function of fund manager, decision-maker and implementing agency.

On **integrity screenings**, CAFI performs averagely, not least because the importance of personal integrity is absent from fund policies.

On **integrity training**, CAFI performs averagely. While UN organisations and the World Bank offer mandatory capacity building on integrity at both headquarters and local offices, no evidence could be found to indicate that other bilateral donor agencies provide compulsory integrity training.

Analysis

Indicator (3.1) Anti-Corruption Rules

Does CAFI have a policy and respective guidelines that require individual employees or approved members, but also implementing agencies and their collaborators, to be bound by an effective code of conduct which requires ethical and anti-corrupt behaviour and prohibits corrupt or fraudulent behaviour (including conflicts of interest)?

This general scoring question was complemented by the following specific guidance questions:

- + Are there comprehensive codes of conduct written into the guiding documents for the fund and the implementing agencies? Are those documents publicly available? If they do exist, how are existing codes of conduct enforced?

- + In practice, do appointed members and technical staff comport themselves according to widely accepted standards of professional conduct? What are the existing sanctions (if any) in case of non-compliance?
- + Does CAFI have a conflict of interest policy? If so, what does it cover (including additional employment, inside information, private/business interests, policy advice, gifts and other forms of benefits, and personal, family and community expectations and opportunities)?
- + Are appointments of CAFI members based on a clear set of professional criteria? In practice, are the professional backgrounds of nominated members relevant to the mandate of the fund or body they would be serving under?
- + Who appoints these members? Are sitting members in the fund subject to disclosure requirements?
- + Are there any procedures to verify given disclosure reports as accurate?

The CAFI Fund does not have its own anti-corruption policy. This means there is no fundamental principle or commitment of the fund to ensure anti-corruption at all levels of decision-making and operations. However, in April 2019, the CAFI Executive Board adopted a Risk Management Strategy that identifies the risks of fraud and corruption and other kinds of risk related to the fund programme and project implementation. This strategy is not available online.⁸¹

CAFI Secretariat staff (and implementing partners, as well as responsible parties) are bound by the UNDP's policy of "zero tolerance for fraud and corruption".⁸² Detailed information is provided on the UNDP website, including on fraud and corruption definitions,⁸³ fraud prevention measures, roles and responsibilities, fraud reporting, investigation and remediation. It covers a wide range of non-compliant conduct and integrity requirements, such as family relationships, conflicts of interest, and falsification or forging of documents.

Regarding conflicts of interest, CAFI relies on UNDP policy, which is mainly oriented toward UNDP staff activities when it comes to recruitment.⁸⁴ Conflicts of interest at the level of the organisation are not clearly addressed. However, UNDP's management of the use of CAFI funds clearly seems to represent a conflict of

interest. UNDP is simultaneously a fund administrator (through MPTF), a fund management facilitator (through the CAFI Secretariat), a fund allocation decision maker (as a member of the Executive Board) and an implementing agency (in DRC). In short, UNDP manages the fund, decides how and to whom it should be allocated and implements the programmes. So far, UNDP has been allocated US\$74 million from CAFI Fund⁸⁵ (out of US\$231 million already deposited by the funding partners). Executive Board (EB) procedures mention that "The EB determines whether the involvement of the EB member and/or observer is such that the EB member and/or observer making the disclosure should recuse itself from the deliberation, discussion and/or decision by the EB with respect to the national investment framework or national programme concerned, and will advise such EB member and/or observer accordingly". However, this is not a sufficient safeguard measure, as this article is in no way an obligation for UNDP representatives (or any Executive Board members) to withdraw from the decision-making process even when UNDP is directly involved in a country programme. In addition, UNDP representatives can participate in the debates that would lead to the final decision, given that there are no minutes for these meetings.

The same statement could be made, to a lesser extent, to France's participation in the CAFI Fund, both as a board member and as an executive agency (although in this case, the Executive Board member is the Ministry of Foreign Affairs and the implementing agency is the French Development Agency).

At **local level**, implementing organisations have pledged to display a high level of awareness with regard to the fraud, corruption and other risks identified in the Risk Management Strategy.⁸⁶ They are expected to be proactive in reporting these risks to the Board and mitigating them. These procedures are only available on the implementing agencies' websites and cannot be found easily (see previous indicators). CAFI's website does not provide any consolidated information on the various fraud and corruption policies. In addition, there is no evidence that suggests an active review or performance evaluation of how anti-corruption or conflict-of-interest requirements have been applied by implementing agencies.⁸⁷

Indicator (3.2) Integrity Screenings

Are appointed members and technical staff subject to integrity screenings or background checks prior to employment?

This general scoring question was complemented by the following specific guidance questions:

- + Is there a comprehensive code of conduct/ ethics and a conflict-of-interest policy for CAFI personnel and CAFI supported programmes? Are integrity screenings or background checks required to be conducted?
- + If so, what do they cover (for example, education, employment history, reference checks, credential verification, criminal records, sanctioning by relevant regulatory authorities, identification as a possible politically exposed person, adverse media coverage, and conflicts of interest, among others)?
- + Are they conducted by internal or external bodies?

At CAFI level, there is no information available from fund documentation or the fund's website suggesting that integrity screening is a requirement or is encouraged for any actors engaging in the fund, including recipients of finance.

For CAFI Secretariat staff, considered as UNDP employees, the UNDP Recruitment and Selection Framework applies. Staff recruitment processes should consider a set of criteria for the selection of candidates, including their qualifications, demonstrated competencies and performance, integrity and diversity. New staff are required to fill in a "Conflict of Interest Declaration Form". The recruitment and selection criteria and all phases of the recruitment process should be to the fullest extent possible transparent to staff and candidates. There is, however, no clear definition of what the "fullest extent possible" means.

Each implementing agency has its own system in place. There seems to be no requirement for the agencies to conduct integrity screening of implementing entities locally or of any other third-party contractors.

Indicator (3.3) Integrity Training

Are appointed members and technical staff trained on issues of integrity?

This general scoring question was complemented by the following specific guidance questions:

- + Are there requirements for staff to be trained on codes of professional conduct or integrity as part of their integration?
- + Are appointees and staff required to attend any classes or briefings explaining in detail the respective codes of conduct they are subject to? What, if any, sanctions exist for non-compliance?

There is no specific or systematic CAFI-wide initiative around integrity training. This is therefore not a requirement and no sanction exists for non-compliance.

According to available information, integrity and ethics training are accessible online for UNDP staff. For World Bank employees,⁸⁸ training on issues of integrity is mandatory. This does not seem to be the case for the other implementing organisations.

FONAREDD

Transparency

Overview of the Transparency Performance Assessment

TRANSPARENCY	PERFORMANCE
<p>Indicator (1.1): Policy-Level Transparency. Are there policy provisions in place for public access to information regarding FONAREDD administration and operations, including activities, outputs and decisions?</p>	Above average
<p>Indicator (1.2): Practice-Level Transparency. In practice, can the general public obtain relevant and timely information on FONAREDD policies, procedures, activities, outputs and decisions throughout the project cycle?</p>	Average

FONAREDD is assessed as above average regarding its policies and procedures to provide access to information. These procedures are comprehensive and are available on the FONAREDD website. They have been drafted in plain, intelligible language. However, they may not be sufficient to ensure dissemination of information at the community level. They also conflict with the implementing agencies' own procedures.

In terms of transparency practice, FONAREDD is assessed as average, as the website is not regularly updated and some information is missing.

Analysis

Indicator (1.1) Policy-Level Transparency

Are there policy provisions in place for public access to information regarding FONAREDD's administration and operations, including activities, outputs and decisions?

This general scoring question was complemented by the following specific guidance questions:

- + Do general guidelines regarding public access to information/information disclosure exist? Are these guidelines publicly available?
- + Do these guidelines or any kind of open public access system apply to all phases of the project cycle (elaboration of programme Terms of Reference, programme attribution, PRODOC validation, programme reporting, disbursements, management, implementation, monitoring and evaluation)?
- + Are there deadlines for making such information available?
- + Do the provisions allow for any exemptions of information disclosure and confidentiality? If so, to what extent are these exemptions justified?

Do the guidelines or any kind of open public access system allow for an appeal procedure to request non-disclosed information? Are there specified deadlines for making such information available? If so, is the information available within a reasonable timeframe (20-30 working days)?

Two main documents govern the functioning of FONAREDD. Both are available on the FONAREDD website and easily accessible:

- + The FONAREDD⁸⁹ **Terms of Reference** describe the objectives and the fund management mechanism. One specific chapter is dedicated to transparency and accountability, and lists the documents that should be publicly released on the FONAREDD website. These Terms of Reference are very clear about public disclosure: The Ministry of Finance, the Ministry of the Environment, the FONAREDD steering committee and the MPTF Office will work together in order to ensure full transparency and accountability of the fund operations”.
- + The **Operations Manual**⁹⁰ describes the rules and procedures applicable to FONAREDD. This details the REDD+ programme and project cycle, the role of institutional mechanisms and the REDD+ quality measures. It provides a solid mechanism for evaluating both programmatic and financial performances. It also describes the governance system to ensure the transparency and fiduciary credibility of the fund. There is no mention of any non-disclosed information policy, which implies that all fund operations should be disclosed. In Annex 6, the Operations Manual provides a comprehensive description of the complaint mechanism. Any party aggrieved or affected by a FONAREDD programme can file a complaint following this process.

Although the FONAREDD procedures are quite comprehensive and ensure the transparency of fund operations, there are two clear shortcomings:

- + The available procedures contain very limited explanation of how programme and project information can be disseminated at the community level. Accessing the internet in remote parts of a country is sometimes impossible, and no other mechanism is foreseen to make the fund information available to everyone.
- + These measures conflict with agreements between MPTF and the implementing agencies that specify that the agencies’ procedures supersede any other transparency system.

Indicator (1.2) Practice-Level Transparency

In practice, can members of the public obtain relevant and timely information on FONAREDD’s policies, procedures, activities, outputs and decisions throughout the project cycle?

This general scoring question was also complemented by the following specific guidance questions:

- + Is this information: available freely online (FONAREDD, CAFI, implementing agencies or MPTF website) or available on request; accurate and complete; coherent and understandable; timely and reliable, as in required within a certain timeframe or by a specific deadline if one exists, or within a reasonable timeframe if no deadline exists; and regularly updated?
- + If access to information provisions allows for confidentiality/non-disclosure of information, in practice are these provisions interpreted and applied with good justification with regard to the greater public interest and the right to know?

All programme and project documents are supposed to be made available on the FONAREDD website. However, in some cases the information has not been updated or is missing. In addition, the documents regarding the tendering process for contracting an implementing agency are not fully available. This is also the case for the financial reports submitted by the implementing agencies to the MPTF.

Table 5 summarises which information is missing and which documents are available on the FONAREDD website in relation to programmes and projects. Some documents may also be available on the CAFI website.

TABLE 5: PROGRAMME AND PROJECT DOCUMENTS AVAILABLE ON THE FONAREDD WEBSITE, DECEMBER 2019

Current programmes/ projects	Tendering process			PRODOC ⁹¹	Implementation Reports ⁹²
	Terms of Reference	Proposals	Committee Decisions		
PIREDD Mai Ndombé	Yes ⁹³	No	Technical Committee (TC): No Steering Committee (SC): Yes ⁹⁴	Yes	Annual: Yes; Semestrial: Partial Financial: No; SC ⁹⁵ : No
PIREDD Province Orientale	Yes	No	TC: Partial SC: Yes ⁹⁶	Yes	Annual: No; Semestrial: Partial Financial: No; SC: No
PIREDD Sud Ubangi	Yes	No	TC: Partial SC: Yes	Yes	Annual: Yes; Semestrial: Partial Financial: No; SC: No
PIREDD Kwilu	Yes	Yes (JICA, CTB)	TC: Yes SC: Partial	Yes	Annual: –; Semestrial: Yes Financial: No; SC: No
PIREDD Mongala	Yes	Yes (WB, UNOPS, ONUDI ENABEL)	TC: Yes SC: Yes ⁹⁷	Yes	Annual: N/A ⁹⁸ ; Semestrial: N/A Financial: N/A; SC: N/A
PIREDD Equator	Yes	No	TC: No SC: Yes	Yes	Annual: N/A; Semestrial: N/A Financial: N/A; SC: N/A
SNSF ⁹⁹	Yes ¹⁰⁰	Yes (FAO)	TC: Partial SC: Yes	Yes	Annual: Yes; Semestrial: Yes Financial: No; SC: Yes
Land-use planning	Yes ¹⁰¹	No	TC: Yes SC: Yes	Yes	Annual: Yes; Semestrial: Yes Financial: No; SC: No
Land tenure	Yes ¹⁰²	No	TC: Yes SC: Yes	Yes	Annual: Yes; Semestrial: Yes Financial: No; SC: Partial
Capacity building of civil society	Yes ¹⁰³	Yes (PNUD)	TC: Partial SC: Yes	Yes	Annual: Yes; Semestrial: Partial Financial: No; SC: Partial
Indigenous people	Yes ¹⁰⁴	Yes (WB)	TC: No SC: Yes	Yes	Annual: Yes; Semestrial: Yes Financial: No; SC: No
Energy	No	Yes (UNDP)	TC: Partial SC: Yes ¹⁰⁵	Yes	Annual: Yes; Semestrial: – Financial: No; SC: No
Family planning	Yes	Partial	TC: Yes SC: Yes	Yes	Annual: N/A; Semestrial: N/A Financial: N/A; SC: N/A
Sustainable agriculture	No	No	TC: Yes	Yes	Annual: N/A; Semestrial: N/A Financial: N/A; SC: N/A
Savannas	No	Yes (AFD and ONU Habitat)	TC: Yes SC: Yes ¹⁰⁶	Yes	Annual: N/A; Semestrial: N/A Financial: N/A; SC: N/A
Forest management	Yes (AMI n°4)	No	TC: Yes SC: Yes ¹⁰⁷	Yes	Annual: N/A; Semestrial: N/A Financial: N/A; SC: N/A

Most FONAREDD internal documents (related to FONAREDD activities) can be found on the website, including FONAREDD’s annual report, safeguarding standards, Steering Committee reports, most of the Technical Committee reports (although Reports 1 to 6 are missing). However, several inconsistencies have been found, such as the wrong versions of committee reports, draft versions without the final version of the reports, or lack of update between committee decisions and the programme webpage.

In general, there is a willingness to disclose information publicly and the FONAREDD Secretariat shares additional documents on request. There are no specific exemptions that would prevent the disclosure of any particular information. Nonetheless, delays in updating the website are detrimental to transparency, especially as the deadlines for putting the information online are not always respected.¹⁰⁸ For instance, while the Operations Manual stipulates that FONAREDD annual reports should be made available by May of the following year, the FONAREDD 2018 report was not uploaded until July 2019. Likewise, the programming synoptic table has not been updated since September 2017.

Accountability

Overview of the Accountability Performance Assessment

INTEGRITY	PERFORMANCE
<p>Indicator (2.1): Financial Reporting and Audits. Does FONAREDD have effective financial reporting guidelines in place? Are the activities of relevant organisational decision-making bodies such as the Technical and Steering Committees and implementing organisations subject to audits?</p>	Average
<p>Indicator (2.2): Accountability (Answerability) Mechanisms. Are FONAREDD decisions governed by clear and effective accountability mechanisms?</p>	Above average
<p>Indicator (2.3): Whistleblower Protection. Throughout FONAREDD programme development and implementation, are there mechanisms to handle whistleblowing or the exposure of wrongdoing by FONAREDD or implementing agency staff, member state representatives, contractors, subcontractors and consultants?</p>	Below average
<p>Indicator (2.4): Complaints and Investigation Mechanisms. Are there independent and effective mechanisms in place to register and investigate complaints by external actors about corruption or fraud?</p>	Above average
<p>Indicator (2.5): Sanctions. Are there effective policies and procedures in place to penalise corruption and fraud?</p>	Below average
<p>Indicator (2.6): Civil Society Consultation. Is FONAREDD required to consult with civil society throughout programme elaboration, attribution and implementation?</p>	Above average
<p>Indicator (2.7): Observer Participation. Do independent civil society actors participate meaningfully in the proceedings of FONAREDD?</p>	Above average

The FONAREDD Secretariat relies on financial data provided by the MPTF Office to prepare its consolidated reports. Due to CAFI MPTF procedures, FONAREDD does not receive the comprehensive financial reports elaborated by the implementing agencies, which use their own internal rules and are not accountable to FONAREDD.

FONAREDD has put in place reasonably robust mechanisms to ensure **accountability**, from decision making through to project and programme implementation, but in practice some information is still missing.

Protection of whistleblowers was rated below average because, although there are provisions in place, it is unclear whether these would effectively protect a partner country administration officer.

Complaint mechanisms exist and are available on the FONAREDD website. However, they are not well suited for collecting complaints from local communities.

While there is a policy in place on sanctions for FONAREDD Secretariat staff, no information is provided on **sanctions** for Technical or Steering Committee members. There seems to be no system in place to address a situation in which committee members were involved in corrupt or fraudulent behaviour in relation to their role within FONAREDD.

For **civil society consultation** and **observer participation**, FONAREDD was given an above-average rating. Civil society representatives are permanent members of the various decision-making bodies at both national and local levels. There remain, nevertheless, uncertainties on how to better address the issues of representativeness and independence of CSO participants.

Analysis

Indicator (2.1) Financial Reporting and Audits

Does FONAREDD have effective financial reporting guidelines in place? Are the activities of relevant organisational decision-making bodies, such as the FONAREDD Board, Technical and Steering Committees, and implementing organisations subject to audits?

This general scoring question was complemented by the following specific guidance questions:

- + Are the Executive Agencies required to submit financial reports to FONAREDD? If so, how often?
- + What types of expenditure are required to be documented in these reports?
- + Are there mechanisms in place to vet the validity of any financial reports?
- + In practice, are there examples of inadequate or fraudulent financial reports being filed from the CAFI Fund?
- + How often are audits required to be conducted?
- + What activities do these audits cover?
- + Are they performed by internal auditing bodies or external agencies?
- + Are the results of audits available to the public?

FONAREDD has no control over the management of the funds. It relies on the financial data provided by MPTF Office for the consolidated data it publishes in its annual reports (for more information, see Section 5.1.2.2).

Participating international organisations (United Nations organisations, multilateral development

banks and other international organisations) can provide capacity-building and project implementation services on request from the DRC government. These organisations sign an MoU with the MPTF Office, as the CAFI Fund administrator. The organisations then have direct access to the fund if their project or programme proposal is approved by the FONAREDD Steering Committee. In this case, they assume full financial and programmatic responsibility for the funds transferred directly to them by the MPTF Office, and implement the approved activities in accordance with their own rules and procedures, including with regards to audits and procurement.

Indicator (2.2) Accountability (Answerability) Mechanisms

Are FONAREDD's decisions governed by clear and effective accountability mechanisms?

This general scoring question was complemented by the following specific guidance questions:

- + How balanced and transparent is the FONAREDD finance mechanism? Do the stakeholders have a clear understanding of how FONAREDD works?
- + Is FONAREDD required to explain its decisions to relevant external actors?
- + Are the decisions of the fund subject to timely and enforceable review?
- + Are explanations of decisions provided to applicants in a predictable and timely fashion?
- + Are there provisions in place detailing the procedures for affected parties to appeal contested decisions made by the fund?
- + Are those procedures publicly available?
- + In practice, how often are appeals to review decisions granted?

FONAREDD's Technical and Steering Committee mechanisms are very clearly described in the FONAREDD Terms of Reference and Operations Manual (both available on its website). Decisions of both committees are also available on the website, but some of the reports might not be available on the relevant webpage (for example, Technical Committee Reports 1 to 6) and others are missing (2018 Steering Committee reports), making information more complicated to gather. These meeting documents contain an elaborate explanation or justification of decisions made. Although they do not contain information on the deliberations taking place within the decision-making bodies, they provide comprehensive information on how and why the final resolutions were made.

The programme Steering Committee reports are also missing. These are considered by some of the implementing agencies as internal documents that do not need to be disclosed.

The external actors interviewed did not report any difficulties in obtaining access to FONAREDD decisions. However, there is a major concern that some decisions made might be guided by CAFI Executive Board resolutions, rather than being the outcomes of FONAREDD committee internal discussions. The decision was taken at the 11th meeting of the Executive Board to approve the disbursement of US\$25 million to the DRC National REDD+ Fund to complement the family planning programme, without further explanation and debate with the DRC administration. This calls into question the ability of FONAREDD decision-making bodies to make transparent and independent decisions in accordance with the REDD+ Investment Plan commitments, if they are subject to CAFI veto. The upstream determination of where resources should go is a key aspect of transparency in allocating resources.

External parties can file complaints regarding FONAREDD decisions and programmes. There is a specific section ("Plaintes et recours" on the FONAREDD website) dedicated to the appeal process.¹⁰⁹ The complaint mechanism is explained and the complainant can file a complaint form directly online or print it and mail it to the FONAREDD Secretariat's office. In addition, each of the implementing agencies has its own specific mechanisms (See Section 5.1.2.2). So far, at country level, no major objection has been officially made to FONAREDD by the national organisations.

International organisations prefer to contact the CAFI Secretariat and Executive Board members directly about DRC matters, rather than FONAREDD.

Indicator (2.3) Whistleblower Protection

Throughout FONAREDD programme development and implementation, are there mechanisms to handle whistleblowing or the exposure of wrongdoing by FONAREDD, implementing agency staff, member state representatives, contractors, subcontractors and consultants?

This general scoring question was complemented by the following specific guidance questions:

- + Is there any official policy or system for whistleblowing or the exposure of wrongdoing? How is the policy or system enforced?
- + What are the procedures for handling disclosures from whistleblowers and other types of reports of wrongdoing?
- + Are whistleblowers protected from termination, harassment or other forms of reprisals?
- + Have whistleblowers faced adverse consequences for their actions?
- + Are there effective policies and procedures in place to penalise wrongdoing by FONAREDD, CAFI or implementing agency staff, member state representatives, contractors, subcontractors and consultants (corruption, fraud, mismanagement, etc.)? Is a summary of received reports published, as well as actions taken?
- + Have employees, contractors and subcontractors, and independent observers, among others, reported wrongdoing? If so, what were the results of the disclosures?

CAFI Executing Agencies implementing FONAREDD programmes have their own whistleblower protection mechanisms (see Section 5.1.2.2).

When it comes to local executing agencies (other than executing agencies that are also CAFI Executive Board members) and partner country national or provincial agencies, it becomes less clear what protection any of their staff would enjoy if they were to report a case of corruption. It is also unclear what protection would be afforded to any national or local public official who reports a case of corruption or fraud in the implementation of a CAFI- or FONAREDD-financed programme, and by whom this protection would be guaranteed. It is assumed that the whistleblower should directly contact the appropriate government agency, which would provide protection. However, in countries with weak governance, this is unlikely to be provided. The FONAREDD Terms of Reference and Operations Manual do not provide any clarification on how such a situation could be handled.

This gap may reflect the issue of agencies' procedures superseding those of FONAREDD. Much more clarity is needed from FONAREDD on its policy in this regard, and how and for whom it applies. FONAREDD should also identify any significant gaps in whistleblower protection, especially where incidents of corruption are more likely to occur. This would contribute to a more comprehensive anti-corruption system.

According to the various stakeholders interviewed, no specific wrongdoing has been reported so far.

Indicator (2.4) Complaints and Investigation Mechanisms

Are there independent and effective mechanisms in place to register and investigate complaints by external actors about corruption or fraud?

This general scoring question was complemented by the following specific guidance questions:

- + Are the existing procedures for how external actors can lodge complaints against FONAREDD relevant, publicly available and operational?
- + Is there a dedicated body within the fund body to handle complaints?
- + Is FONAREDD required to respond to complaints?
- + In practice, how often does the Fund respond to complaints about its activities or actions?

FONAREDD has put in place a comprehensive complaint mechanism that is easily available on its website.¹¹⁰ The FONAREDD Secretariat is in charge of the registration and investigation of these complaints. Following receipt of a message, the secretariat's Monitoring and Evaluation Officer liaises with the project secretariat and the Steering Committee to agree the best way to manage the complaint and seek resolution. An email from the Monitoring and Evaluation Officer briefly explains to the complainant how the complaint will be dealt with. The Steering Committee or the Monitoring and Evaluation Officer has a period of 30 days from receipt of the complaint to acknowledge receipt and to propose measures for its resolution. This period may be extended by an additional month if the investigation of the complaint requires, once the complainant has been informed.

According to the process laid out on FONAREDD's website, after a two-week investigation, the stakeholders directly involved (FONAREDD and the project or programme supervisor) decide the proposals for resolving the problems and the complainant is informed. If the resolution proposed by the stakeholders is not accepted by the complainant, the case must be presented to the Steering Committee.

So far, only two complaints have been made to FONAREDD through the existing mechanism, but no record of complaints has been published. It could be that this system is better designed for receiving complaints from Kinshasa-based organisations than from local community groups, who may have greater difficulty communicating with the FONAREDD Secretariat and Steering Committee. The delivery of the final complaint mechanism was delayed until early 2019, which may also explain why so few complaints have been received. It is therefore difficult to assess how these complaints are or could be addressed.

As with the CAFI fund, FONAREDD relies on implementing agencies' own procedures to investigate complaints made by an individual or an organisation. To some extent, this is also a way to delegate the registration and investigation of complaints to implementing agencies whose internal procedures can officially be used by external actors. However, having several unconnected complaint mechanisms can lead to a loss of information and reduce the capacity of FONAREDD and the programmes to trigger action.

Indicator (2.5) Sanctions (see also CAFI Indicator)

Are there effective policies and procedures in place to penalise corruption and fraud?

This general scoring question was also complemented by the following specific guidance questions:

- + Does FONAREDD have policies and procedures which require that sanctions or punishments for corrupt or fraudulent behaviour or activity be imposed and enforced at all levels of the fund (including the Technical and Steering Committees) and throughout the project cycle?
- + What is the scope of the policy coverage?
- + If a policy exists, to what extent has it been applied? Does the policy require that sanctions are determined in a fair and independent manner? Does the policy allow for an appeals process?
- + Is information on these policies and on sanctions imposed publicly available?

The employees of the FONAREDD Secretariat are employees of UNDP and, as such, fall under its policies and are subject to its internal investigation and sanctioning procedures for corrupt behaviour. As specified in the agreements with the implementing agencies, their own policies apply with respect to corruption investigation and sanction procedures.

Each of these agencies has relatively comprehensive corruption and fraud penalty procedures.

There is no specific sanction mechanism for the Technical and Steering Committee members. There seems to be no system in place to address corrupt or fraudulent behaviour by committee members in relation to their role within FONAREDD.

No information regarding specific sanctions imposed on local agencies implementing FONAREDD programmes was found in the various lists available online.

Indicator (2.6) Civil Society Consultation

Is FONAREDD required to consult with civil society throughout programme elaboration, attribution and implementation?

This general scoring question was complemented by the following specific guidance questions:

- + Is the fund required to actively consult with civil society regarding its decisions or actions?
- + Do the programmes or the implementing agencies have their own participatory manuals and are they implemented?
- + Are there clearly stated and enforced penalties for failures to consult with civil society?
- + In practice, how extensive are consultations between FONAREDD, the implementing agencies and civil society?
- + In practice, to what extent are civil society recommendations acted on?

One of the principles of FONAREDD activities listed in the Terms of Reference states that there must be, “a broad participation of the Fund’s stakeholders in the governance process, including the participation of donors and civil society”.

Annex 5 of the FONAREDD Operations Manual repeats this information and asks for, “full and effective participation of relevant stakeholders, in particular indigenous peoples and local communities” in the REDD+ programmes.¹¹¹

Civil society has one seat in each of the FONAREDD decision-making bodies (the Technical and Steering Committees). According to the civil society representatives interviewed, their voices are consistently and well listened to by the other members, and no decision can be made without their approval. However, criticisms have been levelled by some NGO representatives regarding the selection of the civil society representative attending the meetings. This is a legitimate concern, as DRC civil society is composed of hundreds of organisations and is very weakly organised. The extent to which one person can represent the whole of Congolese civil society is open to question.

In addition, as the CSO representative is also a member of the REDD+ Working Group (GTCR-R),¹¹² there are concerns regarding a possible conflict of interest and lack of independence,¹¹³ as GTCR-R is financially sponsored by FONAREDD through a programme implemented by UNDP.¹¹⁴

At the operational level, FONAREDD has produced a roadmap for transparent and effective participation throughout the whole project management cycle (elaboration, attribution and implementation). This roadmap did not aim to define the detailed modalities of participatory processes, but to identify the broad outlines of such processes. In addition, a manual was developed that provides more specific recommendations to FONAREDD programme and project executive agencies for conducting participatory processes. However, despite strong civil society involvement in the development of this manual, it remains unclear how it is used and implemented by the executive agencies. This is underlined by the Independent Assessment of the milestones in the Letter of Intent,¹¹⁵ which found that:

- + “While the FONAREDD programmes have coherent and complementary objectives, the operational rules vary from one implementing agency to another, in accordance with their own internal procedures. This highlights the weakness and limits of FONAREDD’s role in the system.”

- + “There is no effective control of the [civil society consultation] mechanism and FONAREDD’s role is in actual fact extremely limited, making the assessment of effective participation more difficult.”
- + “There is very limited involvement of the private sector in the mechanism.”

Although the implementing agencies are only accountable to the MPTF, the FONAREDD Secretariat and governance structures have been increasingly involved in oversight and holding the agencies to account.

Most agencies implementing a project at the provincial level have put in place a steering committee that includes provincial or local CSO representatives. This does not seem to be the case for institutional programmes, such as land planning reform.¹¹⁶

Indicator (2.7) Observer participation

Do independent civil society actors participate meaningfully in the proceedings of FONAREDD?

This general scoring question was complemented by the following specific guidance questions:

- + Are members of civil society allowed to participate in FONAREDD meetings or any other programme meetings?
- + If so, is that role primarily participatory or observational?
- + In practice, are members of civil society allowed meaningful access to FONAREDD’s proceedings?

- + Which civil society actors regularly participate? How are they selected? Do they have ties to appointed members?

Civil society actors generally participate actively in the various decision-making bodies at FONAREDD national programme and provincial levels. Although, according to interviewees, they are more than simple observers, it is difficult to assess the real influence of civil society on final decisions.

The independence and representativeness of civil society organisations participating in decision-making meetings is also regularly questioned by other organisations.¹¹⁷ This concern is shared by other initiatives and major programmes, such as Forest Law Enforcement, Governance and Trade Voluntary Participation Agreement (FLEGT VPA) negotiation. However, FONAREDD is addressing this issue by financing a civil society programme that aims at helping CSOs better organise.

Integrity

Overview of the Integrity Performance Assessment

INTEGRITY	PERFORMANCE
<p>Indicator (3.1): Anti-Corruption Rules. Does FONAREDD have a policy and respective guidelines which require individual employees or approved members, but also the implementing agencies and their collaborators, to be bound by an effective code of conduct, which requires ethical and anti-corrupt behaviour and prohibits corrupt or fraudulent behaviour, including conflicts of interest?</p>	<p>Below average</p>
<p>Indicator (3.2): Integrity Screenings. Are appointed members and technical staff subject to integrity screenings or background checks prior to employment?</p>	<p>Average</p>
<p>Indicator (3.3): Integrity Training. Are appointed members and technical staff trained in issues of integrity?</p>	<p>Below average</p>

On **anti-corruption rules**, FONAREDD's performance is below average. Existing UNDP rules are applied to FONAREDD Secretariat staff. Implementing organisations are required to have a proactive approach to the risk of fraud and corruption, through the agreements signed with CAFI MPTF.¹¹⁸ However, these procedures are not easily accessible on the FONAREDD website and the implementation of these policies is not assessed. Critically, FONAREDD does not clearly address corruption at the national administration level, which is a critical issue given the rampant corruption in the Congolese administration.

Worryingly, UNDP is also involved in a major conflict of interest, being the fund manager, one of the decision makers and one of the implementing agencies (through FONAREDD and several projects).

On **integrity screenings**, FONAREDD performed averagely, as it relies on UNDP and other implementing agency policies. However, integrity screening does not apply to Technical and Steering Committee members.

On **integrity training**, FONAREDD also performs below average. Although FONAREDD staff, as UN staff, are required to undergo online training on integrity issues, there is no evidence that local implementing organisations that are not international cooperation agencies or partner country administrations have participated in any training programme on this matter. FONAREDD has not made such training compulsory for implementing agencies.

Analysis

Indicator (3.1) Anti-Corruption Rules

Does FONAREDD have a policy and respective guidelines which require individual employees or approved members, but also the implementing agencies and their collaborators, to be bound by an effective code of conduct, which requires ethical and anti-corrupt behaviour and prohibits corrupt or fraudulent behaviour, including conflicts of interest?

This general scoring question was also complemented by the following specific guidance questions:

- + Are there comprehensive codes of conduct written into the guiding documents for the fund and the implementing agency? Are those documents publicly available? If they do exist, how are existing codes of conduct enforced?
- + In practice, do appointed members and technical staff comport themselves according to widely accepted standards of professional conduct? What, if any, sanctions exist for non-compliance?
- + Does CAFI have a conflict of interest policy? If so, what does it cover (including additional employment, inside information, private/business interests, policy advice, gifts and other forms of benefit, and personal, family and community expectations and opportunities)?
- + Are appointments to FONAREDD made on a clear set of professional criteria? In practice, are the professional backgrounds of nominated members relevant to the mandate of the fund or body they would be serving under?
- + Who appoints these members? Are sitting members in the fund subject to disclosure requirements?

- + Are there any procedures to verify given disclosure reports as accurate?

This indicator is further described in the section on CAFI.

UNDP rules apply to all FONAREDD Secretariat staff (who are also UNDP staff). However, it is not clear whether the members of the FONAREDD Committees are bound by the rules and procedures of their respective governments (where they exist) or internal FONAREDD rules. The implementing organisations have also pledged to display a high level of awareness with regards to the fraud, corruption and all other risks identified in the Risk Management procedures.¹¹⁹

In DRC, corruption among national authorities is a major concern. Transparency International ranked DRC 168 out of 180 countries in its Corruption Perception Index 2019. Another indicator is the World Bank 2013 corruption index (Graft Index), which gives DRC 44 per cent – far above the Sub-Saharan African average of 20.4 per cent.¹²⁰ In spite of this particularly sensitive context, the risk matrix, drafted by FONAREDD in a participatory manner, gives very limited space to the identification of corruption cases and mitigation measures.¹²¹ It merely recommends targeting efforts toward supporting civil society. There are no specific provisions, such as a code of conduct, in place for administrative staff participating in programme execution.

Such provisions should also apply to all committee members, including CSO representatives, who should be required to follow a strict code of conduct and declare potential conflicts of interest.

As discussed in the Transparency International report on “Anti-corruption Assessment of Climate Investment Funds”,¹²² this approach can leave room for potential disparities in interpretations of corruption. It also relies on competent national institutions mandated to monitor the professional conduct of government representatives sitting on the FONAREDD Committees.

Indicator (3.2) Integrity Screenings

Are appointed members and technical staff subject to integrity screenings or background checks prior to employment?

This general scoring question was complemented by the following specific guidance questions:

- + Is there a comprehensive code of conduct/ ethics and a conflict of interest policy for FONAREDD personnel and FONAREDD-supported programmes? Are integrity screenings or background checks required to be conducted?
- + If so, what do they cover (for example, education, employment history, reference checks, credential verification, criminal records, sanctioning by relevant regulatory authorities, identification as a possible politically exposed person, adverse media coverage, and conflicts of interest, among others)?
- + Are they conducted by internal or external bodies?

This indicator is further described in the section on CAFI.

Each implementing agency has its own system in place. There seems to be no requirement for the agencies to conduct integrity screening of implementing local entities or of any other third-party contractors. Nor is there any integrity screening for the Technical and Steering Committee members. However, members must sign a declaration that they have no conflicts of interest before joining a committee.¹²³ In this declaration, the members recognise that they have no conflict of interest, that they will show impartiality when making decisions and that they will treat all documents as confidential.

In addition, committee members involved in a FONAREDD programme or project cannot participate in decision making about that particular programme or project. For example, CSO representatives did not participate in decisions over the programme to support to civil society.

In November 2018, at the 11th CAFI Executive Board meeting, members made the decision that International NGOs or research institutions could also be selected by the Executive Board to sign an Administrative Support Services Agreement with UNDP.¹²⁴ If FONAREDD were to open CAFI Fund programme implementation to international NGOs, there would be a need for more requirements on their respective anti-corruption and integrity policies.

Indicator (3.3) Integrity Training

Are appointed members and technical staff trained on issues of integrity?

This general scoring question was complemented by the following specific guidance questions:

- + Are there requirements for staff to be trained on codes of professional conduct or integrity as part of their integration?
- + Are appointees and staff required to attend any classes or briefings explaining in detail the respective codes of conduct they are subject to? What, if any, sanctions exist for non-compliance?

As UNDP staff, FONAREDD staff are required to follow UNDP's online training on integrity issues.

Main implementing agencies have such programmes, but it is unclear if it is compulsory for national employees to take these online courses. National administration officers who are partnering with implementing agencies to carry out FONAREDD programmes are not required to take the courses.



photo: Muhammad Wasi / Wikimedia

ANNEXES

ANNEX 1: OVERVIEW OF THE ORGANISATIONS INVOLVED IN CAFI AND FONAREDD

MPTF Office

- + A UNDP structure responsible for administering the CAFI Fund.
- + The MPTF Office signs agreements with participating organisations.
- + It approves the financial report provided by implementing agencies.
- + The office transfers funds to the implementing agencies' bank accounts.

CAFI Executive Board

- + Members are donor governments and other entities which have signed the CAFI Joint Declaration and contributed to the CAFI Fund (or through parallel funding). The current members are Norway, France, the United Kingdom, Germany, the European Union, the Netherlands, South Korea and UNDP on behalf of the UN implementing organisations.
- + Permanent observers are the UN Food and Agriculture Organisation and the World Bank.

- + The CAFI Executive Board concludes the Letters of Intent with partner countries and makes decisions about funding allocation.
- + With the support of the CAFI Secretariat, it organises intersessional meetings targeting specific topics.

CAFI Secretariat

- + The CAFI Secretariat is hosted by UNDP and composed of UNDP staff.
- + It assists the Executive Board by organising meetings, preparing the progress and financial reports, and facilitating the dialogues with partner countries.
- + It informs the MPTF Office about funding allocation decisions and funding disbursements to programmes.
- + The secretariat also manages programme implementation directly or through a national fund (such as FONAREDD in DRC).

Implementing agencies (also called implementing partners or organisations)

- + There are four types of implementing agencies: UN Organisations, the World Bank, International Cooperation Agencies and other organisations, such as NGOs and research institutes.
- + Agencies that have signed an agreement with the CAFI MPTF Office can be selected by a partner country to support the development or implementation of their National Investment Frameworks.
- + In March 2020, these agencies were:
 - + Japanese International Cooperation Agency
 - + Belgian Development Agency
 - + Food and Agriculture Organisation (Member of the CAFI Board through UNDP)
 - + French Development Agency (Member of CAFI Board)
 - + United Nations Capital Development Fund (Member of the CAFI Board through UNDP)
 - + UNDP (Member of the CAFI Board)
 - + United Nations Settlements Programme (Member of the CAFI Board through UNDP)
 - + United Nations Population Fund (Member of the CAFI Board through UNDP)
 - + United Nations Office for Project Services (Member of the CAFI Board through UNDP)
 - + World Bank (Member of CAFI Board as observer)
- + These agencies implement programmes for which they have been selected by the Board
- + They report financially only to the MPTF Office.

Partner countries

- + These are the six Central African countries supported by CAFI to address the challenge of sustainable economic development and the fight against climate change, rampant deforestation and forest degradation.
- + They are Cameroon, Central African Republic, Republic of the Congo, Equatorial Guinea, Gabon and Democratic Republic of the Congo.

FONAREDD

- + FONAREDD is the DRC mechanism established to carry out the REDD+ Strategy
- + The fiduciary management of the fund has been delegated to MPTF Office by the Government of DRC through its Ministry of Finance
- + The fund is governed by the DRC Ministry of Finance.

FONAREDD Steering Committee

- + The Steering Committee is FONAREDD's guiding and decision-making body. It is composed of:
 - + The Ministry of Finance (Chair)
 - + The Ministry of Environment (Co-chair)
 - + Four ministry representatives (Agriculture, Energy, Land tenure and Land-use planning)
 - + Two donor representatives
 - + Two CSO representatives
 - + One private-sector representative
 - + The UNDP Resident
 - + A representative of the partners of the REDD+ process in DRC
 - + The Executive Coordinator of the UNDP MPTF Office.

Among several other duties, the Steering Committee is more specifically responsible for:

- + Conducting a final review of programme proposals for approval and disbursement authorisation
- + Authorising, on the basis of its decisions, and through the Executive Secretariat, the disbursement of funding to implementing agencies by the MPTF Office
- + Responding to complaints
- + Adopting socio-environmental criteria and procedures to be considered in the selection, implementation, monitoring and evaluation of programmes.

FONAREDD Technical Committee

The Technical Committee constitutes a specific entity for the review of investment plans, programme proposals, validation of programme monitoring and evaluation reports, and reporting and verification related to the REDD+ process. The committee is composed of:

- + The Ministry of the Environment (Chair)
- + A Prime Ministerial representative (Co-chair, vice-president)
- + A representative of the REDD+ programme in DRC
- + One academic expert
- + One civil society expert
- + Two donor representatives
- + One expert from the UN REDD+ programme
- + One expert from the World Bank
- + Two independent experts.

Among several duties, the COPIL is more specifically responsible for:

- + Conducting a systematic and detailed evaluation of programme proposals
- + Issuing recommendations on REDD+ programme documents and requesting a second review before submission to the Steering Committee
- + Issuing opinions and recommendations to the Steering Committee on all REDD+ country reports.
- + Monitoring and evaluation submitted to the Executive Secretariat
- + Providing a report with recommendations to the Steering Committee regarding the programme proposals.

FONAREDD Executive Secretariat

Under the coordination of the Minister of Finance, the FONAREDD Executive Secretariat is the national structure in charge of the management of the fund. It has the following functions:

- + Manage the fund's operating activities
- + Assist the Technical Committee in the evaluation of programme proposals
- + Support implementing agencies in the formulation of programme proposals following the Expression of Interest process
- + Plan, implement, monitor and evaluate the fund's portfolio.

ANNEX 2: MAIN BIBLIOGRAPHY

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- Letter of Intent to Establish the Partnership between the Government of the Gabonese Republic (Gabon) and the Central African Forest Initiative (CAFI) to implement the National Investment Framework of Gabon, 2017
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Projet de compte-rendu de la 2^{ème} réunion du Comité de Pilotage du Fonds National REDD+ - FONAREDD, October 2016

Compte-rendu et décisions de la 3^{ème} réunion du Comité de Pilotage du Fonds National REDD+ - FONAREDD, February 2017

Compte-rendu et décisions de la 4^{ème} réunion du Comité de Pilotage du Fonds National REDD+ - FONAREDD, July 2017

Compte-rendu et décisions de la 5^{ème} réunion du Comité de Pilotage du Fonds National REDD+ - FONAREDD, October 2018

Compte-rendu et décisions du premier Comité de Pilotage restreint du Fonds National REDD+ - FONAREDD, May 2019

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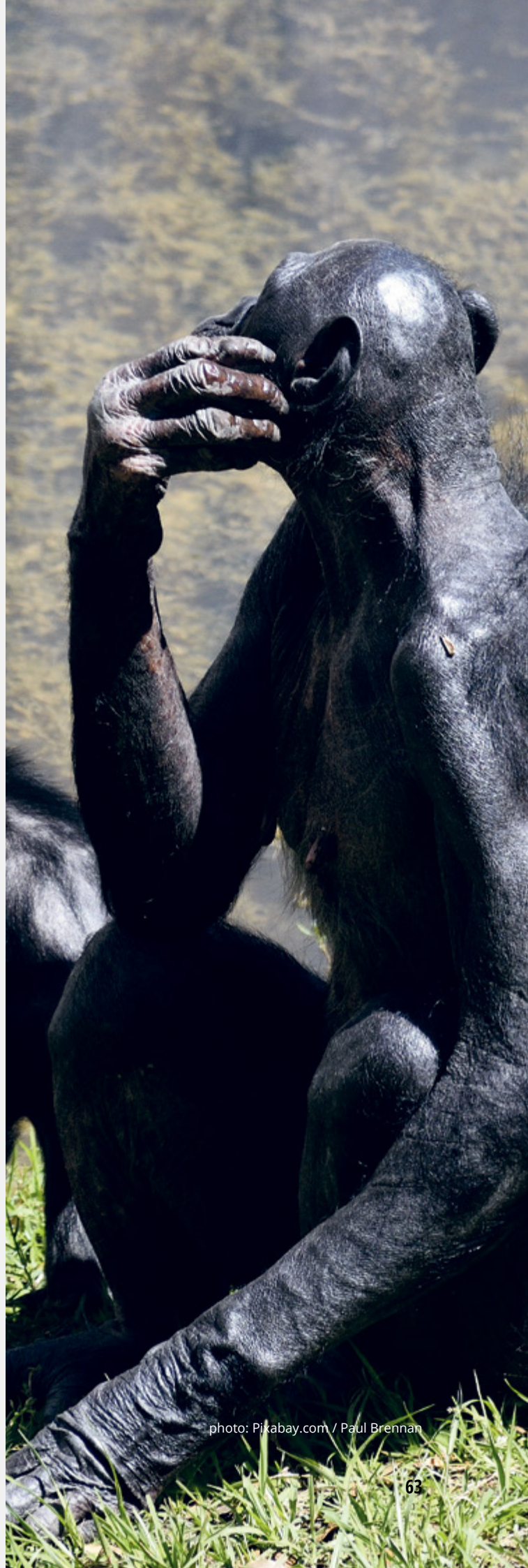


photo: Pixabay.com / Paul Brennan

ANNEX 3: INDICATOR SCORING AND GUIDING QUESTIONS

Assessment Indicators	Guidance questions
Transparency	
Indicator (1.1): Policy-Level Transparency	<p>Scoring question: Are there policy provisions in place for public access to information regarding the FONAREDD and CAFI administration and operations, including activities, outputs and decisions?</p> <p>Specific Guidance Questions: Do general guidelines (elaborated by FONAREDD) or specific guidelines (elaborated by the Executive Agencies) regarding public access to information/ information disclosure exist? Are these guidelines publicly available?</p> <p>Do these guidelines (such as the FONAREDD operational guidelines) or any kind of open public access system (FONAREDD website contents, for example) apply to all phases of the project cycle (elaboration of programme Terms of Reference, programme attribution and agreement between implementing agencies and MPTF, PRODOC validation, programme reporting, disbursements, management, implementation, monitoring and evaluation)? Are there deadlines for making such information available? Do the provisions allow for any exemptions of information disclosure and confidentiality? If so, to what extent are these exemptions justified?</p> <p>Do the guidelines or any kind of open public access system allow for an appeal procedure to request non-disclosed information? Are there stated deadlines for making such information available? If so, is it available within a reasonable timeframe (20-30 working days)?</p>
	<p>Weak</p> <p>There are no provisions available to disclose information publicly or on request, or information provided is not comprehensive or timely.</p>
	<p>Average</p> <p>There are provisions in place, or the information is either available publicly or on request and is reasonably comprehensive and timely (maybe not time-bound).</p>
	<p>Strong</p> <p>There are clear provisions in place and the information is freely available in the public domain, comprehensive and timely.</p>
Indicator (1.2): Practice-Level Transparency	<p>Scoring Question: In practice, can members of the public obtain relevant and timely information on the funds’ policies, procedures, activities, outputs and decisions throughout the project cycle, such as: FONAREDD Technical Committee reports and decisions, FONAREDD Steering Committee decisions, CAFI Board decisions, implementing agency and FONAREDD progress reports.</p> <p>Specific Guidance Questions: Is this information: available freely online (FONAREDD, CAFI, implementing agency or MPTF website) or available on request; accurate and complete; coherent and understandable; timely and reliable, as in required within a certain timeframe or by a specific deadline if one exists, or within a reasonable timeframe if no deadline exists, and regularly updated? If access to information provisions allow for confidentiality/non-disclosure of information, in practice are these provisions interpreted and applied with good justification with regard to the greater public interest and the right to be informed?</p>
	<p>Weak</p> <p>There is no provision available to disclose information publicly or on request, or the information provided is not comprehensive or timely. Interested parties have no/very limited access to the fund’s proceedings.</p>
	<p>Average</p> <p>There is a provision in place, or the information is either available publicly or on request and is reasonably comprehensive and timely. Interested parties have some access to the fund’s proceedings</p>
	<p>Strong</p> <p>The information is freely available in the public domain and is comprehensive and timely. Interested parties have full access to the fund’s proceedings.</p>

Accountability	
<p>Indicator (2.1): Financial Reporting and Audits</p>	<p>Scoring Question: Does the Fund (CAFI Fund and/or FONAREDD as an intersectoral coordination tool) have effective financial reporting guidelines in place? Are the activities of relevant organisational decision-making bodies such as the CAFI Board and FONAREDD Technical and Steering committees subject to audits?</p> <p>Specific Guidance Questions: Are the Executive Agencies and FONAREDD required to submit financial reports to MPTF and CAFI? If so, how often? What types of expenditure are required to be documented in these reports? Are there mechanisms in place to vet the validity of any financial reports? In practice, are there examples of inadequate or fraudulent financial reports being filed from the CAFI Fund? How often are audits required to be conducted? What activities do these audits cover? Are they performed by internal auditing bodies or external agencies? Are the results of audits available to the public?</p>
Weak	There are no financial reporting requirements.
Average	Financial reporting requirements exist, but are insufficiently thorough or inconsistently applied.
Strong	Explicit reporting guidelines are in place and effectively enforced.
<p>Indicator (2.2): Accountability (Answerability) Mechanisms</p>	<p>Scoring Question: Are CAFI or FONAREDD's decisions governed by clear and effective accountability mechanisms?</p> <p>Specific Guidance Questions: How balanced and transparent is the fund finance mechanism? Do the stakeholders have a clear understanding of how the fund works? Are CAFI and FONAREDD required to explain decisions to relevant external actors in the DRC? Are the decisions of the fund subject to timely and enforceable review? Are explanations of decisions provided to applicants in a predictable and timely fashion? Are there provisions in place detailing the procedures for affected parties to appeal contested decisions made by the fund? Are those procedures publicly available? In practice, how often are appeals to review decisions granted?</p>
Weak	The fund's finance mechanism is complex, opaque and does not support either a balanced representation of interests or effective regulatory oversight. The fund is not required to explain its decisions.
Average	Procedures for the provision of explanations of decisions, as well as for appeal of decisions, are in place, but they are unclear and/or ineffective.
Strong	The fund provides comprehensive, clear and transparent explanations of its decisions on a regular and predictable basis. Clear appeal procedures are publicly available and are consistently adhered to.

<p>Indicator (2.3): Whistleblower Protection</p>	<p>Scoring Question: Throughout CAFI and FONAREDD programme development and implementation, are there mechanisms to handle whistleblowing or the exposure of wrongdoing by FONAREDD, CAFI or implementing agency staff, member state representatives, contractors, subcontractors and consultants?</p> <p>Specific Guidance Questions: Is there any official policy or system for whistleblowing or the exposure of wrongdoing? How is the policy or system enforced? What are the procedures for handling disclosures from whistleblowers and other types of reports of wrongdoing? Are whistleblowers protected from termination, harassment or other forms of reprisals? Have whistleblowers faced adverse consequences for their actions? Are there effective policies and procedures in place to penalise wrongdoing by FONAREDD, CAFI or implementing agency staff, member state representatives, contractors, subcontractors and consultants (corruption, fraud, mismanagement, etc.)? Is a summary of reports received published, as well as actions taken? Have employees, contractors and subcontractors, independent observers, among others, reported wrongdoing? If so, what were the results of the disclosures?</p>
<p>Weak</p>	<p>There is no protection for whistleblowers.</p>
<p>Average</p>	<p>Provisions exist to protect whistleblowers, but they are incomplete or poorly enforced, and/or individuals who expose wrongdoing are still subject to reprisals in practice.</p>
<p>Strong</p>	<p>Whistleblowers are provided with comprehensive protection, both on paper and in practice.</p>
<p>Indicator (2.4): Complaints and Investigation Mechanisms</p>	<p>Scoring Question: Are there independent and effective mechanisms in place to register and investigate complaints by external actors about corruption or fraud?</p> <p>Specific Guidance Questions: Are the existing procedures for how external actors can lodge complaints against FONAREDD and/or CAFI relevant, publicly available and operational? Is there a dedicated body within the fund body to handle complaints? Are FONAREDD and/or CAFI required to respond to complaints? In practice, how often does the fund respond to complaints about its activities or actions?</p>
<p>Weak</p>	<p>There are no provisions to handle complaints and no procedures for imposing sanctions for wrongdoing.</p>
<p>Average</p>	<p>There are provisions in place to manage complaints, but recipients do not respond in a consistent manner and sanctions are rarely imposed.</p>
<p>Strong</p>	<p>There is a clear and accessible complaints procedure, including the imposition of sanctions, that is consistently applied.</p>
<p>Indicator (2.5): Sanctions</p>	<p>Scoring Question: Are there effective policies and procedures in place to penalise corruption and fraud?</p> <p>Specific Guidance Questions: Do FONAREDD and CAFI have policies and procedures which require sanctions or punishments for corrupt or fraudulent behaviour or activity to be imposed and enforced at all levels of the funds and throughout the project cycle? What is the scope of the policy coverage? If a policy exists, to what extent has it been applied? Does the policy require that sanctions are determined in a fair and independent manner? Does the policy allow for an appeals process? Is information on these policies and about sanctions imposed publicly available?</p>

Weak	There are no effective policies and procedures in place to penalise corruption and fraud.
Average	There are policies and procedures in place to penalise corruption or fraud, but they are insufficient and/or inconsistent.
Strong	There are effective policies and procedures in place to penalise corruption and fraud at all levels of the fund.
Weak	<p>Scoring Question: Are CAFI and FONAREDD required to consult with civil society throughout programme elaboration, attribution and implementation?</p> <p>Specific Guidance Questions: Is there any evidence that the participatory manual elaborated by FONAREDD is implemented? Does it require the fund to actively consult with civil society regarding its decisions or actions? Do the programmes or the implementing agencies have their own participatory manuals and are they implemented? Are there clearly stated and enforced penalties for failures to consult with civil society? In practice, how extensive are consultations between FONAREDD, CAFI, the implementing agencies and civil society? In practice, to what extent are civil society recommendations acted on?</p>
Average	<p>Indicator (2.6): Civil Society Consultation</p>
Weak	There is no consultation between FONAREDD, the implementing agencies and civil society.
Average	There are provisions requiring consultation, but consultation is irregular and limited, and/or recommendations are rarely acted on.
Strong	There is regular and meaningful consultation between FONAREDD, the implementing agencies and civil society
Weak	<p>Scoring Question: Do independent civil society actors participate meaningfully in the proceedings of FONAREDD and CAFI?</p> <p>Specific Guidance Questions: Are members of civil society allowed to participate in FONAREDD Technical and Steering Committees, CAFI Board meetings or any other programme meetings? If so, is that role primarily participatory or observational? In practice, are members of civil society allowed meaningful access to FONAREDD's proceedings? Which civil society actors regularly participate? In which FONAREDD programmes? How are they selected? Do they have ties to appointed members?</p>
Average	<p>Indicator (2.7): Observer Participation</p>
Weak	Civil society representatives are not allowed to participate in any of FONAREDD's proceedings
Average	Civil society representatives may attend proceedings, but their participation is largely passive
Strong	Civil society representatives are afforded access and provided the opportunity to contribute meaningfully to proceedings

Integrity

Indicator (3.1): Anti-Corruption Rules

Scoring Question: Do FONAREDD and CAFI in DRC have a policy and respective guidelines which require individual employees or approved members, as well as the implementing agencies and their collaborators, to be bound by an effective code of conduct which requires ethical and anti-corrupt behaviour and prohibits corrupt or fraudulent behaviour, including conflicts of interest?

Specific Guidance Questions: Are there comprehensive codes of conduct written into the guiding documents for the fund and the implementing agencies? Are those documents publicly available? If they do exist, how are existing codes of conduct enforced?

In practice, do appointed members and technical staff comport themselves according to widely accepted standards of professional conduct? What, if any, sanctions exist for non-compliance? Do FONAREDD and CAFI have a conflict-of-interest policy? If so, what does it cover (including additional employment, inside information, private/business interests, policy advice, gifts and other forms of benefit, and personal, family and community expectations and opportunities)? Are appointments to FONAREDD made on a clear set of professional criteria?

In practice, are the professional backgrounds of nominated members relevant to the mandate of the fund or body they would be serving under?

Who appoints these members? Are sitting members in the fund subject to disclosure requirements?

Are there any procedures to verify given disclosure reports as accurate?

Weak	<p>There are no guidelines related to professional conduct.</p> <p>There is no conflict-of-interest policy, appointments are not based on a clear process or criteria, and there are no disclosure requirements.</p>
Average	<p>Guidelines exist, but they are not comprehensive and/or actively monitored or enforced.</p> <p>A conflict-of-interest policy exists, appointments are made on the basis of a clear process and criteria, and disclosure requirements exist. However, these are neither sufficient nor comprehensive enough to meet comparable international standards.</p>
Strong	<p>Clearly established, comprehensive guidelines exist, are available publicly and are actively enforced.</p> <p>An effective conflict-of-interest policy exists, appointments are made based on clear criteria, and there are clear and comprehensive disclosure requirements in place and regularly enforced.</p>

Indicator (3.2): Integrity Screenings

Scoring Question: Are appointed members and technical staff subject to integrity screenings or background checks prior to employment?

Specific Guidance Questions: Is there a comprehensive code of conduct/ethics and a conflict-of-interest policy for FONAREDD personnel and for implementing agency personnel working on CAFI-supported programmes? Are integrity screenings or background checks required to be conducted?

If so, what do they cover (for example, education, employment history, reference checks, credential verification, criminal records, sanctioning by relevant regulatory authorities, identification as a possible politically exposed person, adverse media coverage, and conflicts of interest, among others)?

Are they conducted by internal or external bodies?

Weak	<p>There is no requirement for integrity screenings or background checks to be conducted. There are no guidelines related to professional conduct.</p>
Average	<p>Guidelines may exist but they are not comprehensive, and/or actively monitored or enforced. Screenings or checks are required, but they are either not conducted or not comprehensive and/or conducted by independent actors.</p>

Strong	Clearly established, comprehensive guidelines exist and are available publicly and actively enforced. Comprehensive screenings and checks are required prior to employment and carried out by independent actors.
Indicator (3.3): Integrity Training	<p>Scoring Question: Are appointed members and technical staff trained on issues of integrity?</p> <p>Specific Guidance Questions: Are there requirements for staff to be trained in codes of professional conduct or integrity as part of their orientation? Are appointees and staff required to attend any classes or briefings explaining in detail the respective codes of conduct they are subject to? What, if any, sanctions exist for non-compliance?</p>
Weak	There is no integrity training.
Average	Evidence of some actors being trained is available, but for other actors, such training is unknown. Training may be offered, but optional and not required.
Strong	Integrity training is required and there are clear and widely enforced penalties for non-participation.

ANNEX 4: LIST OF STAKEHOLDER ORGANISATIONS CONTACTED

Related Fund Stakeholders

- + CAFI Board members
- + CAFI Secretariat
- + FONAREDD Secretariat

- + Ministry of Land Use Planning, Democratic Republic of the Congo
- + Programmes & Executive Agencies International Forest Investment Program, Ministry of Environment and Sustainable Development, Democratic Republic of the Congo

Civil Society in Democratic Republic of the Congo

- + Ligue Congolaise de Lutte contre la Corruption (LICOLO)
- + Organisation of Accompaniment and Support for Pygmies (Organisation d'Accompagnement et d'Appui aux Pygmées - OSAPY)
- + REDD+ Working Group, Democratic Republic of the Congo

International NGOs

- + FERN
- + Rain Forest Foundation UK
- + Rain Forest Foundation Norway
- + Tropenbos International

Technical and Financial partners in Democratic Republic of the Congo

- + Norway's International Climate and Forest Initiative (NICFI)

ENDNOTES

- ¹ REDD+ is an international framework whose name stands for 'reducing emissions from deforestation and forest degradation, conservation of existing forest carbon stocks, sustainable forest management and enhancement of forest carbon stocks'.
- ² *Global Corruption Barometer Africa 2019*, Transparency International, 2019
- ³ The midterm evaluation of the Central African Forest Initiative (CAFI) Fund was launched in January 2020. The tendering process for the evaluation of FONAREDD is ongoing.
- ⁴ The consultant who conducted this independent verification is also the main author of this report.
- ⁵ *Safeguarding Climate Finance Procurement: National-Level Procurement of the Green Climate Fund, 2018; A tale of four funds, 2017*
- ⁶ *Corruption Perceptions Index 2019*, Transparency International, 2019
- ⁷ Forest Atlas Dashboard, Global Forest Watch, 2019 <https://www.globalforestwatch.org/map?map=eyJjZW50ZXliOmsibGF0ljoyNywibG5nljoxMn0smjYXJpbmciOjAsInBpdGN0ljowLCJ6b29tIjoyfQ%3D%3D>
- ⁸ Forest Atlas Dashboard, Global Forest Watch, 2019 <https://www.globalforestwatch.org/map/country/COD?mainMap=eyJzaG93QW5hbHlzaXMiOnRydwVW9&map=eyJjZW50ZXliOmsibGF0ljoyNC4wODk4OTUyMTQyNDgyMjQsImxuZyI6MjEuNzU2MTA4Mjg1MDEyNzF9LCJiZWZyaW5nIjowLCJwaXRjaCI6MCIwem9vbSI6NC4yNDAYMjg1MTY2MzU3MTYsImNhbG9vbW5kIjpmYXxzZSwiYmJveCI6W119&mapPrompts=eyJvcGVuLjpoOcnVILCjZdGVVvc0tleSI6InN1YnNjcmlhZVRvQXJlYSIsInN0ZXJibmRleCI6MH0%3D&menu=eyJkYXRhc2V0Q2F0ZWdvcnkiOiJmb3Jlc3RDaGFuZ2UuLCJtZW51U2VjdGlvbiI6IiIj9&treeLossPct=eyJoaWdobGlnaHRIZCI6ZmFsc2V9>
- ⁹ *Combating deforestation: Optimizing the implementation of the REDD+ mechanism in Africa*, African Development Bank, Special session COP24, 2018
- ¹⁰ *Stratégie-Cadre Nationale REDD+ De La République Démocratique Du Congo, ONU-REDD*
- ¹¹ *Niveau d'émissions de référence des forêts pour la réduction des émissions dues à la déforestation en République Démocratique Du Congo*, UNCC, 2018
- ¹² The Central African Republic (CAR), the Republic of Cameroon, the Republic of the Congo, the Democratic Republic of the Congo (DRC), the Republic of Equatorial Guinea, the Republic of Gabon
- ¹³ The European Union, the Federal Republic of Germany, the Kingdom of Norway, the Republic of France, the United Kingdom, the Kingdom of the Netherlands, the Republic of Korea.
- ¹⁴ See www.cafi.org/content/cafifr/home/our-work/how-we-work/the-cafi-declaration.html
- ¹⁵ For more detailed information, see: How we work, CAFI website, www.cafi.org/content/cafien/home/our-work/governance.html
- ¹⁶ A synthetic overview of CAFI
- ¹⁷ See: Standard memorandum of understanding for the Central African Forest Initiative Multi-Partner Trust Fund, CAFI MPTF, September 2015, <http://mptf.undp.org/document/download/15351>
- ¹⁸ See: Terms of Reference CAFI Multi Partner Trust Fund 2015-2022, www.cafi.org/content/dam/cafifr/docs/Executive%20Board/CAFI%20Terms%20of%20Reference%20Revised%20November%202018%20.pdf
- ¹⁹ See: Standard Administrative Arrangement for the Central Africa Forest Initiative Multi-Partner Trust Fund, CAFI MPTF, September 2015, available on demand
- ²⁰ CAFI's Implementing Organisations are the World Bank, International Cooperation Agencies, UN agencies and other implementing organisations (such as international Non-Governmental Organisations or research institutions invited by the Executive Board to sign an administrative support services agreement with UNDP).
- ²¹ Administration Agreement between the United Nations Development Programme, the International Bank for Reconstruction and Development and the International Development Association concerning the Central African

Forest Initiative Implementation Single-Donor Trust Fund (No. TF072553), September 2016.

²² The starting date is usually the date when the first transfer of funds from MPTF was made. It is available on the MPTF website.

²³ Norway committed to complete the budget directly with an additional US\$25 million.

²⁴ Official French title: Planification nationale de l'affectation des terres et surveillance forestière pour promouvoir des stratégies de développement durable pour le Gabon

²⁵ For more detailed information, see: How we work, CAFI website, www.cafi.org/content/cafi/en/home/our-work/governance.html

²⁶ www.fonaredd-rdc.org/textes-de-reference-manuel

²⁷ Alternatively, a representative of the UN-REDD programme and a representative of the World Bank (as an implementing partner of the Forest Carbon Partnership Facility).

²⁸ Measuring, Reporting and Verification (MRV) is a critical element necessary for the implementation of any REDD+ mechanism

²⁹ Free, Prior and Informed Consent is a key component of effective stakeholder engagement and consultation to be carried out prior to the implementation of REDD+ projects

³⁰ While DRC is CAFI's first country of intervention, other Congo basin countries have recently signed a Letter of Intent and will receive the corresponding CAFI funds. In order to take into account these advances, the choice was made to separate the performance evaluations of both CAFI and FONAREDD, even if a large part of CAFI's performance has been achieved through the implementation of FONAREDD in DRC. This may lead to duplication of information.

³¹ Safeguarding Climate Finance Procurement: National-Level Procurement of the Green Climate Fund, 2018; A tale of four funds, 2017

³² www.cafi.org/content/cafi/en/home/all-news/Independent-verificationoftheDRCmilestones.html

³³ Source: key informant interviews.

³⁴ Ibid

³⁵ Fariello, Frank, Leroy, Anne-Marie, "The World Bank Group Sanctions Process and Its Recent Reforms", The World Bank Group, 2012

³⁶ Source: key informant interviews.

³⁷ See: www.undp.org/content/dam/cafi/docs/Executive%20Board/CAFI%20Executive%20Board%20Rules%20and%20Procedures.pdf

³⁸ See Annex 5 of the FONAREDD Operations Manual

³⁹ At the time this report's publication, the author has been informed by the Secretariat that FONAREDD is reviewing all information on its website, in order to ensure that there are no dead links and that all information is up to date. New recruitments were reportedly underway, and procedures being established to ensure the timeliness of information posted.

⁴⁰ Transparency International ranked DRC 168 out of 180 countries for corruption in 2019.

⁴¹ Pass-through Management, when UNDP acts as Administrative Agent, 2015: "UNDP is often called upon to play the role of Administrative Agent (AA) for Multi-Donor Trust Funds (MDTFs) [...] using the pass-through fund management modality established by the UN system. The pass-through modality is used for UN inter-agency pooled funds that operate in humanitarian, transition, development and climate change contexts. It is used both for global, regional, sub-regional and country level inter-agency pooled funds."

⁴² Standard memorandum of understanding for the Central African Forest Initiative Multi-Partner Trust Fund, CAFI MPTF, 2015, See: <http://mptf.undp.org/document/download/15351>

⁴³ Standard Administrative Arrangement

⁴⁴ See: UNDP Information Disclosure Policy, UNDP website, www.undp.org/content/undp/en/home/accountability/transparency/information-disclosure-policy.html

⁴⁵ This includes UNDP, FAO, UN Habitat, UNCDF, UNOPS, UNFPA

⁴⁶ See: www.undp.org/content/undp/en/home/accountability/transparency/information-disclosure-policy.html

⁴⁷ See: UNDP: "Making information available to the public", UNDP website, <https://popp.undp.org/SitePages/POPPSubject.aspx?SBJID=207&Menu=BusinessUnit>

⁴⁸ See: The World Bank Policy on Access to Information, 2015, <https://policies.worldbank.org/sites/ppf3/PPFDocuments/Forms/DispPage.aspx?docid=3693>

- ⁴⁹ See: Access to Information Directive/Procedure, 2019, <https://policies.worldbank.org/sites/ppf3/PPFDocuments/Forms/DispPage.aspx?docid=e5c12f4e-7f50-44f7-a0d8-78614350f97c>
- ⁵⁰ See: Politique de transparence et de dialogue du groupe AFD, www.afd.fr/sites/afd/files/2018-03-10-04-11/politique-transparence-afd.pdf
- ⁵¹ An integrity office can be contacted for access to the integrity policy of ENABEL.
- ⁵² JICA website (Compliance and Anti-Corruption page) mentions that "JICA shall improve the transparency and fairness of its operations and financial activities in order to secure public trust". But there is no link to a specific transparency policy.
- ⁵³ See: Transparency: Policy and Information, German International Cooperation Agency (GIZ) website, www.giz.de/en/downloads/giz2011-en-policy-transparency.pdf
- ⁵⁴ Source: key informant interviews
- ⁵⁵ Source: key informant interviews
- ⁵⁶ Source: key informant interviews
- ⁵⁷ <https://popp.undp.org/SitePages/POPPRoot.aspx>.
- ⁵⁸ See MPTF website: "Participating Organisations are required to submit final year-end expenditures by April 30 in the following year; Interim expenditure figures are submitted on a voluntary basis and therefore current year figures are not final until the year-end expenditures have been submitted."
<http://mptf.undp.org/factsheet/fund/JXC00>
- ⁵⁹ MPTF Office Generic Annual Programme, Narrative Progress Report, January-December 2018
- ⁶⁰ As an example, programmes implemented by the World Bank are audited every year by an auditing organisation appointed for a three-year period and in charge of all World Bank projects.
- ⁶¹ Source: key informant interviews
- ⁶² Minutes, 11th CAFI Executive Board Meeting, 30 November 2018
- ⁶³ Source: key informant interviews
- ⁶⁴ See UNDP Policy for Protection Against Retaliation for Reporting Misconduct or Cooperating with a Duly Authorised Audit or Investigation, April 2018, www.undp.org/content/dam/undp/library/corporate/ethics/Protection%20against%20Retaliation%20Policy%20-%20English%20-%20March%202019.pdf; World Bank Protections and Procedures for Reporting Misconduct (Whistleblowing), March 2018, <https://policies.worldbank.org/sites/ppf3/PPFDocuments/c83a861827c14d4e910c4f73ae1246ab.pdf>; Code de Conduite du Groupe AFD, www.afd.fr/fr/ressources/code-de-conduite-anti-corruption-du-groupe-afd; ENABEL Policy regarding Fraud and Corruption Risk Management, June 2019, www.enabel.be/sites/default/files/fraud_policy_fr_final.pdf
- ⁶⁵ Source: key informant interviews
- ⁶⁶ Source: key informant interviews
- ⁶⁷ CAFI Terms of Reference, p.18, Revised 12 July 2019
- ⁶⁸ The CAFI Declaration states that the initiative will finance national investment frameworks on request of the national government at the highest level and based on a strong commitment to reforms that address the drivers of deforestation and forest degradation. The Initiative will take a performance-based approach with disbursements based on agreed targets (Letter of Intent agreed between the partner country and donors).
- ⁶⁹ See: https://popp.undp.org/UNDP_POPP_DOCUMENT_LIBRARY/Public/PSU_Sourcing%20of%20Suppliers_Vendor%20Sanctions.docx
- ⁷⁰ See: www.worldbank.org/en/about/unit/sanctions-system#3
- ⁷¹ UNDP Procurement protest and vendor sanctions
- ⁷² Rules and Procedures of the Executive Board of CAFI
- ⁷³ CAFI INGO Roundtable on Forest Management, 9 April 2018
- ⁷⁴ CAFI Executive Boarding Meeting 12, 4-5 April 2019
- ⁷⁵ Source: key informant interviews
- ⁷⁶ Ibid
- ⁷⁷ Rules and Procedures of the Executive Board of CAFI, 2015
- ⁷⁸ Terms of Reference, CAFI 2015-2022, p.15
- ⁷⁹ See "Protecting Climate Finance: An Anti-Corruption Assessment of the Climate Investment Funds", Transparency International, 2014 www.transparency.org/whatwedo/publication/protecting_climate_finance_climate_investment_funds

- ⁸⁰ Such as the Clean Technology Fund, the Pilot Programme for Climate Resilience, the Forest investment Programme and the Scaling-up Renewable Energy in Low-income Countries Programme.
- ⁸¹ CAFI Executive Board Adoption of Risk Management Strategy, 5 April 2019
- ⁸² See UNDP Policy against Fraud and other Corrupt Practices, June 2015, www.undp.org/content/dam/undp/documents/about/transparencydocs/UNDP_Anti-fraud_Policy_English_FINAL.pdf
- ⁸³ “Fraud is any act or omission whereby an individual or entity knowingly misrepresents or conceals a fact a) in order to obtain an undue benefit or advantage or avoid an obligation for himself, herself, itself or a third party and/or b) in such a way as to cause an individual or entity to act, or fail to act, to his, her or its detriment.” Likewise, the common definition of presumptive fraud for the United Nations system is “Allegations that have been deemed to warrant an investigation and, if substantiated, would establish the existence of fraud resulting in loss of resources to the organisation”. Corruption is the act of doing something with an intent to give an advantage inappropriate with official duties to obtain a benefit, to harm or to influence improperly the actions of another party.
- ⁸⁴ See UNDP Recruitment and Selection Framework, July 2009, https://popp.undp.org/UNDP_POPP_DOCUMENT_LIBRARY/Public/HR_Appointment%20and%20Promotion_UNDP%20Recruitment%20and%20Selection%20Framework.pdf
- ⁸⁵ According to the MPTF website: US\$6 million are allocated to UNDP to support the CAFI Secretariat, US\$6 million to support the FONAREDD Secretariat and US\$60 million for DRC programme implementation.
- ⁸⁶ Risk Management matrix
- ⁸⁷ Source: key informant interviews
- ⁸⁸ World Bank integrity training is further detailed in the Transparency International report, “Protecting Climate Finance: An Anti-Corruption Assessment of Climate Investment Funds”, 2014
- ⁸⁹ See: *Termes de Référence du FONAREDD*, FONAREDD, 2013, www.fonaredd-rdc.org/textes-de-reference-tdr
- ⁹⁰ See: *Manuel d’Opérations*, FONAREDD, 2013, www.fonaredd-rdc.org/textes-de-reference-manuel
- ⁹¹ Project Document
- ⁹² See www.fonaredd-rdc.org/portefeuille
- ⁹³ See www.fonaredd-rdc.org/wp-content/uploads/2019/02/2_TDR-de-IAMI-01-FONAREDD-Programmes-Int%C3%A9gr%C3%A9s.pdf
- ⁹⁴ See www.fonaredd-rdc.org/wp-content/uploads/2019/02/170119_Projet-CR-COPI2-FONAREDD_v2.pdf
- ⁹⁵ SC: Project Steering Committee
- ⁹⁶ See www.fonaredd-rdc.org/wp-content/uploads/2019/02/Compte-Rendu-du-3eme-Comite-de-Pilotage-du-FONAREDD-v.-révisée-17-fev-1.pdf
- ⁹⁷ See www.fonaredd-rdc.org/wp-content/uploads/2019/06/Décisions-proposées-COPI2-Restreint-1.pdf
- ⁹⁸ Not available. The programme or project has just begun and no report is yet available.
- ⁹⁹ *Système National de Surveillance des Forêts*
- ¹⁰⁰ See www.fonaredd-rdc.org/wp-content/uploads/2019/02/2_TDR-de-IAMI-03-FONAREDD-Programme-SNSF.pdf
- ¹⁰¹ See fonaredd-rdc.org/wp-content/uploads/2019/02/2_TDR-de-IAMI-05-FONAREDD-Aménagement-du-territoire.pdf
- ¹⁰² See fonaredd-rdc.org/wp-content/uploads/2019/02/2_TDR-de-IAMI-06-FONAREDD-Réforme-foncière.pdf
- ¹⁰³ See fonaredd-rdc.org/wp-content/uploads/2019/02/2_TDR-de-IAMI-07-FONAREDD-Société-Civile_v4.pdf
- ¹⁰⁴ See www.fonaredd-rdc.org/wp-content/uploads/2019/02/2_TDR-de-IAMI-08-Peuples-Autochtones-Pygm%C3%A9s_v3.pdf
- ¹⁰⁵ See fonaredd-rdc.org/wp-content/uploads/2019/02/Décisions-du-COPI2-6-VF-du-07-11-2018.pdf
- ¹⁰⁶ See www.fonaredd-rdc.org/wp-content/uploads/2019/10/COPI2-R_2_draft_Decisions.pdf
- ¹⁰⁷ See fonaredd-rdc.org/wp-content/uploads/2020/02/COPI2-9_Decisions_Finales.pdf
- ¹⁰⁸ According to the FONAREDD Terms of Reference, project and programme data and reports should be disclosed (quasi) in real-time on the website.
- ¹⁰⁹ See www.fonaredd-rdc.org/plaintes-et-recours, *Plaintes et recours*, FONAREDD, January 2019

¹¹⁰See fonaredd-rdc.org/plaintes-et-recours

¹¹¹See fonaredd-rdc.org/textes-de-reference-manuel

¹¹²Groupe de Travail Climat REDD – Rénové

¹¹³Source: key informant interviews

¹¹⁴*Programme d'Appui à la Société Civile*,
www.fonaredd-rdc.org/wp-content/uploads/2019/04/PRO-DOC-Addendum_programme-SC_vF.pdf

¹¹⁵Vérification indépendante des jalons de la lettre d'intention entre la RDC et la CAFI, TERE A 2019

¹¹⁶Source: key informant interviews

¹¹⁷Source: key informant interviews

¹¹⁸See chapter VII of the Standard Memorandum of Understanding regarding the operational aspects of CAFI MPTF, listed as a compulsory annex of the Administrative Support Service Agreements between UNDP and the international cooperation agencies, <http://mptf.undp.org/document/download/23391>

¹¹⁹CAFI Terms of Reference 2015-2022, p.18, adopted 26 April 2016, revised November 2018

¹²⁰World Bank, Congo, Dem. Rep. Country Profile 2013, Enterprise surveys, October 2015. The Graft Index reflects the proportion of times a firm was asked or expected to pay a bribe when soliciting six different public services, permits or licenses.

¹²¹Risk Management Matrix, 30 May 2017

¹²²"Protecting Climate Finance: An Anti-corruption Assessment of Climate Investment Funds", Transparency International, 2014

¹²³Called *Déclaration d'Impartialité de Confidentialité*

¹²⁴www.undp.org/content/dam/cafi/docs/Executive%20Board/CAFI_EB_Decisions/English/EB.2018.15%20-%20Change%20in%20TORs%20regarding%20other%20implementing%20organizations.pdf

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