



# TRANSPARENCY INTERNATIONAL

the global coalition against corruption

**A Forest Governance Integrity Programme**

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# Forest Governance Integrity



- The Forest Governance Integrity (FGI) Programme was established in January 2009
- Goal: to work towards a society where corruption-free forest governance and sustainable management enable increased economic development, poverty reduction and environmental protection.

# Based on the premise that...

Corruption -

*The misuse of entrusted power for private gain*

- is the primary driver of illegal logging

- **Research and Analysis**
  - Analysis and Mapping of Stakeholder and Corruption Systems provide a firm bases for the development of targeted regional and national programme strategies. They also help build purposeful partnerships towards the development of cooperative relations in target countries.
  - Policy papers and diagnostic reports global, regional and national advocacy strategies and campaigns in target countries.

## ■ Capacity Development

- Anticorruption tools promoting transparency, accountability and integrity are adapted or developed to provide target groups with concrete solutions to address integrity in forestry governance issues
- Technical training workshops increase stakeholders' knowledge of the corruption effecting forestry governance and support the implementation of preventative or remedial actions

# Key activities

- **Monitoring and Measurement**
  
- **Monitoring tools developed on the basis of anticorruption and forest governance standards and legislation provide qualitative information on anticorruption efforts and progress of target groups in the region.**
  
- **Risk map and its implementation plays a dual role:**
  - **Advocacy, and a baseline for monitoring**

# Key activities

## ■ Cooperation

- Cooperation in the form of partnerships and networks enable both beneficiaries and target groups to exchange with and learn from each other's information, knowledge, expertise and best practices
- Cooperation increases mutual awareness of stakeholders of their institutions and interventions, potentially also increases mutual trust, efficiency and effectiveness in achieving anticorruption goals and objectives
- Reduces duplication of anticorruption efforts and makes optimal use of available resources.

# Key activities

- Outreach

- Outreach activities enable other stakeholders within and beyond the region to benefit from the technical and operational knowledge, tools and other expertise developed through the Programme.

# Advocacy

- TI's working definition of advocacy:

“Critical but constructive engagement with all stakeholders (including local communities)” focusing on a process of change in

- **who** makes the decisions: participation of civil society, representation of community
- **what** is decided: legislation, policies, budgets, programs
- **how** it is decided: transparency; participation of civil society
- **ways** of enforcement or implementation: accountability, awareness raising, international/regional conventions

- REDD is an incentive mechanism to preserve forests by compensating countries for **R**educing **E**missions from **D**eforestation and **F**orest **D**egradation
  - developing countries would be financially compensated by developed countries for conserving their forests.
  - the cost of halving emissions from the forest sector up to 2030 could be between US \$17 billion and \$33 billion per year
  - *Project: Preventive Anti-Corruption measures in Reducing Emission through Deforestation and Degradation mechanisms (PAC REDD)*
- Build capacity and empower civil society to advocate for anti-corruption measures in REDD payment mechanisms

## **PAC REDD approach**

- Government and donor communities are approached to ensure anti-corruption measures are considered during REDD negotiations on payment mechanisms.
- Tools to ensure transparency and integrity in REDD payments are developed.
- Transparency and due diligence in payments made under REDD scheme are monitored by local CSO groups in target countries

# Why risk mapping?

- The methodology will allow us to propose and advocate for reforms to reduce corruption in various aspects of REDD.
- To identify what recommendations should be made, we need to know first
  1. what the major corruption risks are (*risk map*) module four, steps 2-3
  2. then identify and monitor anti-corruption tools already put in place by the public sector, companies, and NGOs (*monitoring tool*). Module four, step 4

- Gaps and weaknesses spotted in this monitoring exercise will highlight what kind of reforms are needed.
- But both the risk map and the monitoring tool need to fit country contexts
  - *Hence they need to be ‘adapted’ and ‘implemented’ at a country level*

# Purpose of the Manual

- A Resource
- Assessing risks to *integrity* (avoidance of “corruption”)
- Support building transparent and accountable systems
- *Forest Carbon Projects* (REDD+ still at readiness phase)
- National REDD+ strategies (current status)

# Scope of the Manual

- National Focus
- Manual to be used by national and local groups
- Results should inform:
  - National Policy
  - National Planning
  - National Project Implementation

# Context

- REDD is new, complex and constantly changing
- Actors go beyond forestry sector
- Manual is flexible

# Structure of the Manual

Module 1 – Introduction to Corruption Risks and Practices

Module 2 – Introduction to REDD+ and Forest Carbon

Module 3 – Introduction to the assessment framework

## Module 4 – Step by Step Assessment (5 steps)

Step 1- Why do an assessment?

Step 2 – Identifying and prioritizing risks

Step 3 – Analyzing risks

Step 4 – Identifying instruments

Step 5 – Developing an Integrity Strategy

## Annexes

**A** – Active: To be actively used in carrying out the assessment

**B** – Additional Information

# Objectives of Module 1

## Target Audience:

Stakeholders who

- a) have not worked with corruption before
- b) are not familiar with corruption risk assessments
- c) were not involved in the phase 1 project

## What they can learn about:

- What is corruption?
- What are the main impacts of corruption?
- Why do a corruption risk assessment?
- What a corruption risk assessment looks like?
- What are the main instruments to address corruption risks?

# Layout of Module 1

- Introduction: why corruption is an issue in natural resources
- Definition of corruption: sets context
  - Includes description of key terms e.g. integrity, transparency etc.
- Description of key corruption impacts
- Elements of a corruption risk assessment
  - Identifying risks
    - Identify the activities under assessment
    - Identify corruption risks associated with these activities
    - Identify the associated corrupt practices
  - Analyzing root causes of risks
  - Analyzing instruments to address corruption risks

# How to use module 1

- Identify stakeholders (SH) needs
- Use module to engage with SHs according to needs
- Possible approaches\*
  - *Brainstorm* on definition of corruption
  - *Game* matching corruption term to definition
  - *Presentation* on elements of risk assessment
  - *Create* table 1 for water sector\*
  - Adapt table 3 to the national context before discussing or...
  - Extract Module 2 and provide as stand-alone learning tool



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## **PAC REDD: Introduction to Module 2**

### **Concepts of Forest Carbon and REDD+**

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[www.transparency.org](http://www.transparency.org)

# Contents

- Objective of Module 2
- Layout of Module 2
- How to use Module 2

# Objectives of Module 2

## Target Audience:

- a) Forestry Units
- b) SHs who are not familiar with REDD+ / Forest Carbon (FC)

## What they can learn about:

- Background to REDD+
- Overall concepts of REDD+ and FC
- Overall process of national REDD+ development & readiness
- Organizations supporting REDD+
- Links between REDD+, FC and Forest Governance
- FC projects funded through the voluntary carbon market

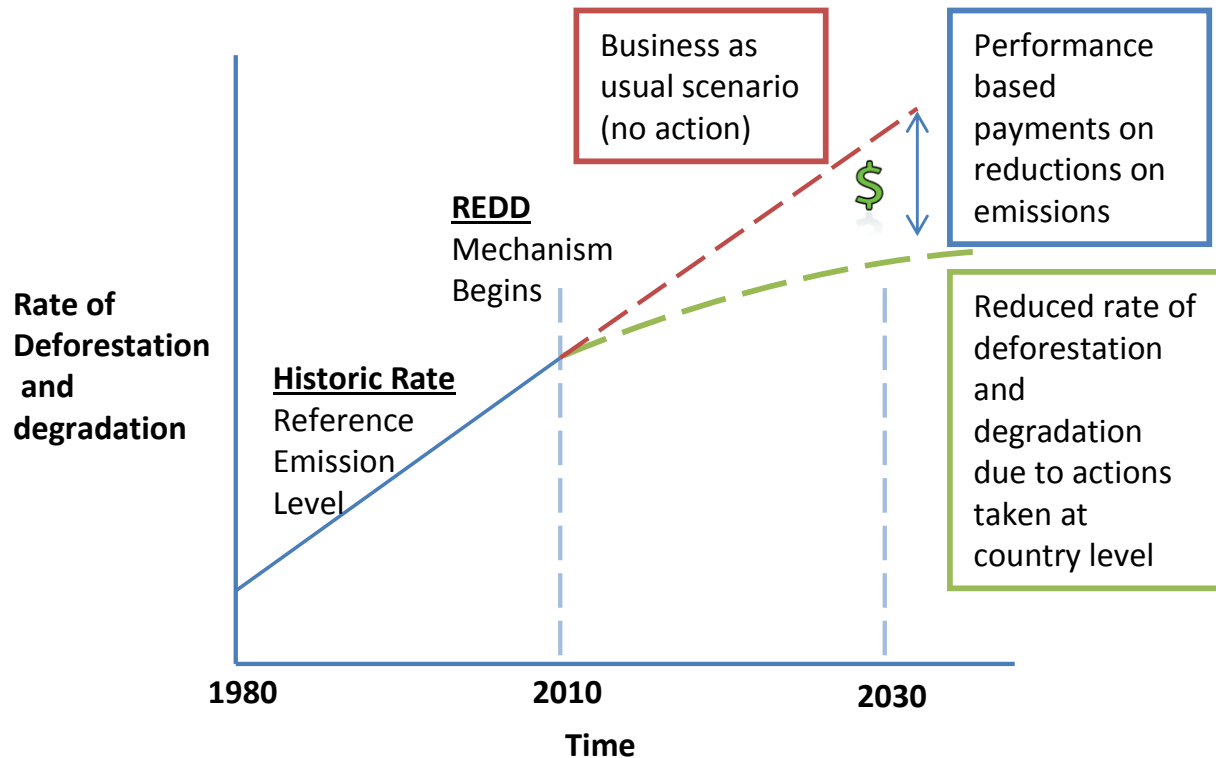
# Background to REDD+

## Where did the idea for REDD come from?

- The Climate Change Challenge
- Government Agreement on Action
  - Rio 1992 – UNFCCC
  - Kyoto 1997 – 2012
  - Conference of Parties, Bali, Copenhagen, Cancun...Durban
- Forests and Carbon Storage
  - 31% of earths surface
  - 13 million hectares per year removed
  - 15-20% of GHG emissions
  - Also wider benefits – adaptation, environmental services

# Overall concepts of REDD+ and FC

## What are REDD & REDD+? What does the mechanism look like?



# Overall concepts of REDD+ and FC



## Characteristics of REDD+

- Lots of \$
- Forest protection in remote areas
- Complex
- Evolving
- Range of actors
- About emissions reductions not governance
- Uncertainty remains on existence of REDD+

# National Level REDD+

## Three Phases



# National Level REDD+ - Readiness



## Our Focus: Readiness Phase

- Forest Carbon Partnership Facility (FCPF) – 37 Countries
- UN REDD Programme – 13 Countries
- Others including Norway (globally and specific countries)

## Readiness includes addressing issues in

forest governance structures,

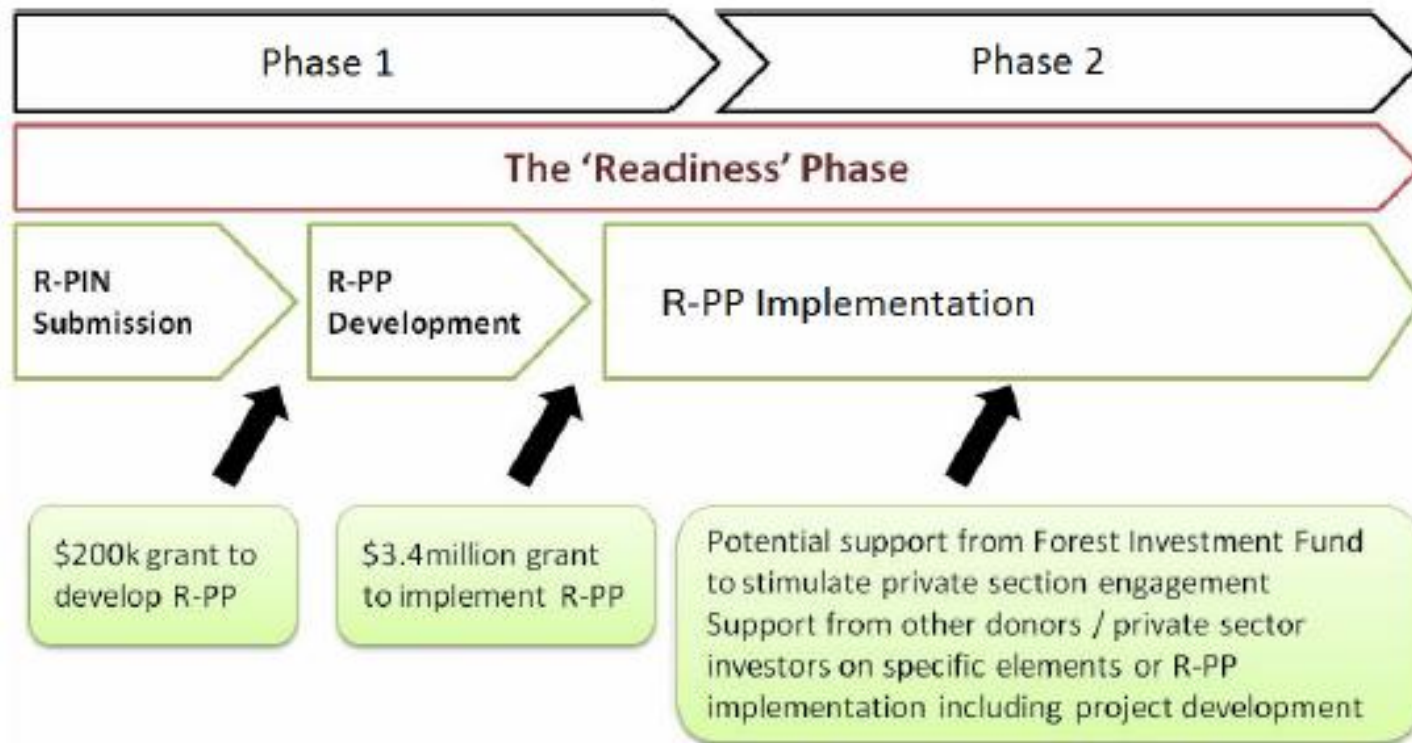
land tenure,

law enforcement,

engagement with forest communities,

And designing systems to measure and monitor changes

# National Level REDD+ Readiness Process



**R-PIN:** Initial Concept note

**R-PP:** National Roadmap towards readiness = (UN-REDD: **National Programme Document**)

6 sections setting out main decision and action areas (p.20)

Fill in steps / decisions taken as well as process to take other decisions (corruption risk here)

# The Voluntary Carbon Market (VCM)



- Individuals and companies choose to “off-set” their emissions
- They buy carbon credits reflecting a verified emission reduction
- The \$ paid finances part of one of these projects
- VCM = 0.1% of Global Carbon Market (rest compliance)
- Compliance market only includes carbon credits from plantation projects
- Benefits of VCM:
  - Forest Carbon projects related not just to plantations
  - Flexibility
  - Innovation (financing, monitoring, methodologies)
    - E.g. Voluntary Standard Development (carbon and co-benefits)

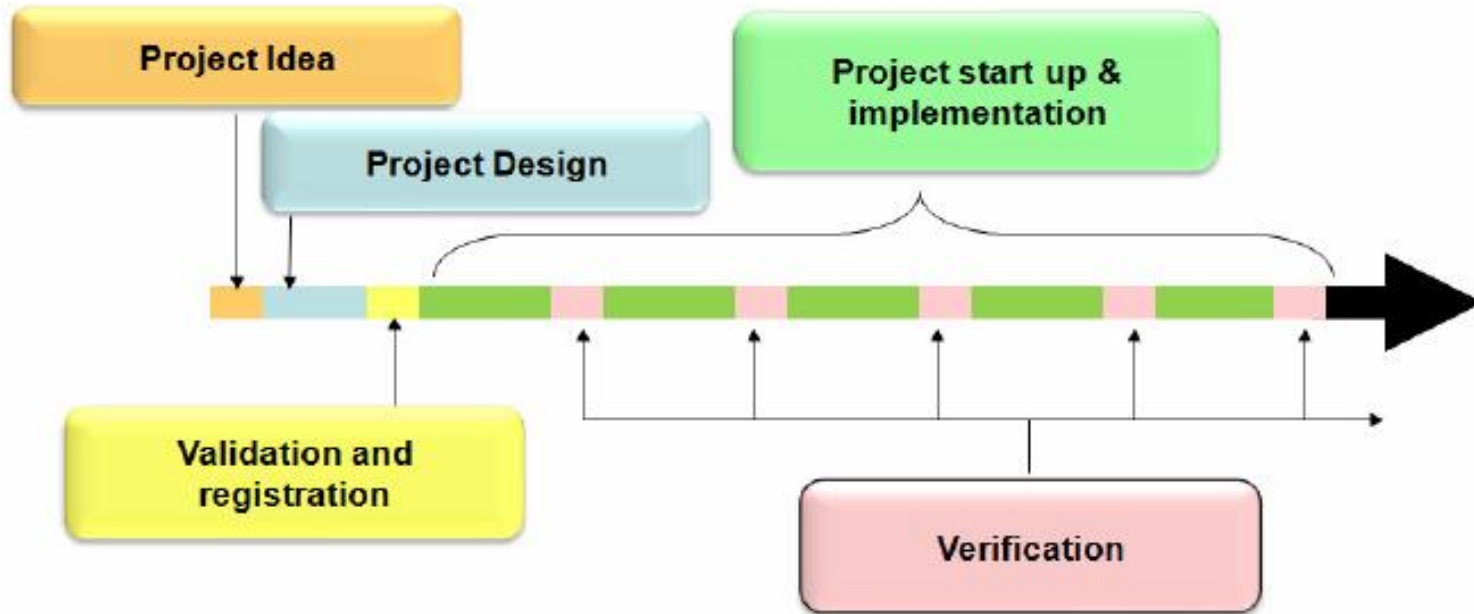
## Forest Carbon Projects (FCPs)

- AF, REDD (29% of VCS) and IFM

### Key features:

- Projects have other objectives e.g. poverty alleviation
- Scale (100-100,000s hectares) – local, sub-national
- **Not** National: absence of national level carbon accounting system\*
- financial return for local resource holders / investors
- Complex alliances between different groups
- Challenges: additionally, leakage, double-counting, permanence, accounting, co-benefits, safeguards
- Number of standards support implementation and monitoring (p.26)
  - the way in which project is developed (addressing key challenges)
  - the way in which emissions reductions are measured and monitored

# FCP Development Process



**Project Idea** – Initial Concept Note

**Project Design** – 5 sections setting out major decision areas page 25

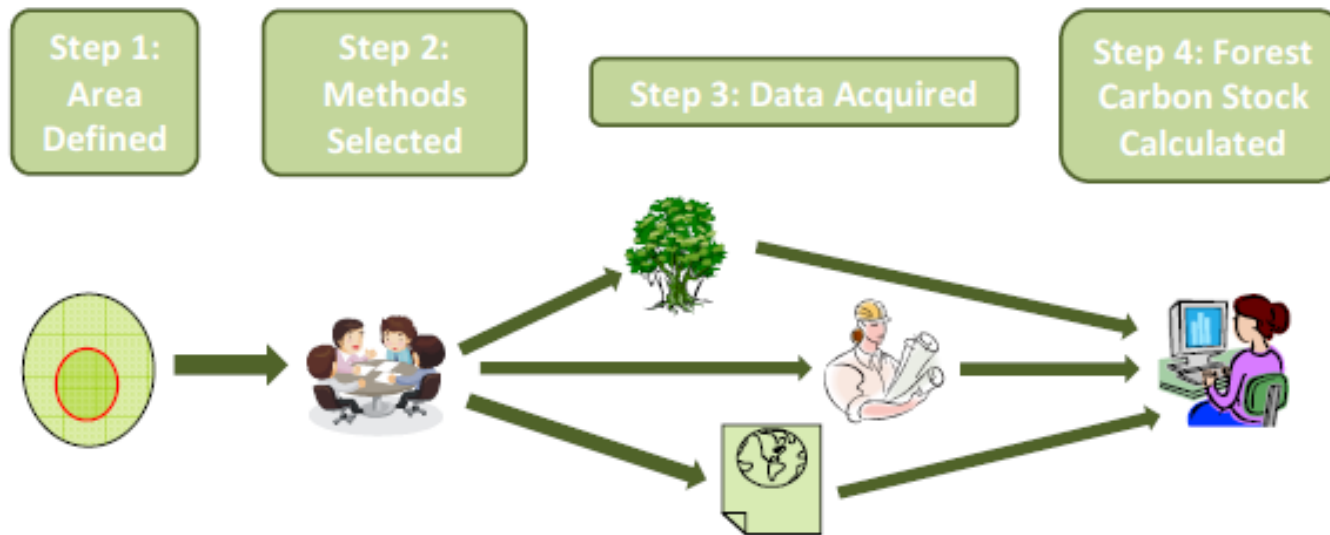
Concerns (corruption): again in process followed to reach decisions

## Forest Carbon versus national REDD+

	Forest Carbon Projects	National REDD+ Strategies
<b>Scale</b>	Projects are implemented at the sub-national or local levels, involving discrete and defined land areas. Current examples of forest carbon projects range from 1,000s ha to 700,000 ha and upwards in size.	Strategies are developed for an entire country, this may include specific strategies for different regions as well as discrete pilot projects designed to test strategies and methodologies (these pilot projects can also be referred to as REDD+ projects and can either form part of the voluntary carbon market or be fully donor funded)
<b>Financing</b>	Start up costs covered through private finance, multilateral, bilateral or NGO funding. Emission reduction credits can later be sold on the voluntary carbon market to provide further finance / profit.	Multilateral and bi-lateral support particularly for national level governance and approaches as well as strategy development. Private or third party finance often sought for pilot projects. There is no market yet for national level emission reductions but there are moves for them to be included within a future agreement and thus a compliance market. Pilot projects included in voluntary market.
<b>Standards</b>	Projects can adhere to a number of voluntary standards such as the Voluntary Carbon Standards	Standards have yet to be finalised but the UN-REDD Programme is developing social and environmental principles, and FCPF are developing safeguards and now include a requirement to abide by World Bank safeguards.

## Measuring success in reducing emissions

Current proposal: relies on calculation of forest carbon (ton)

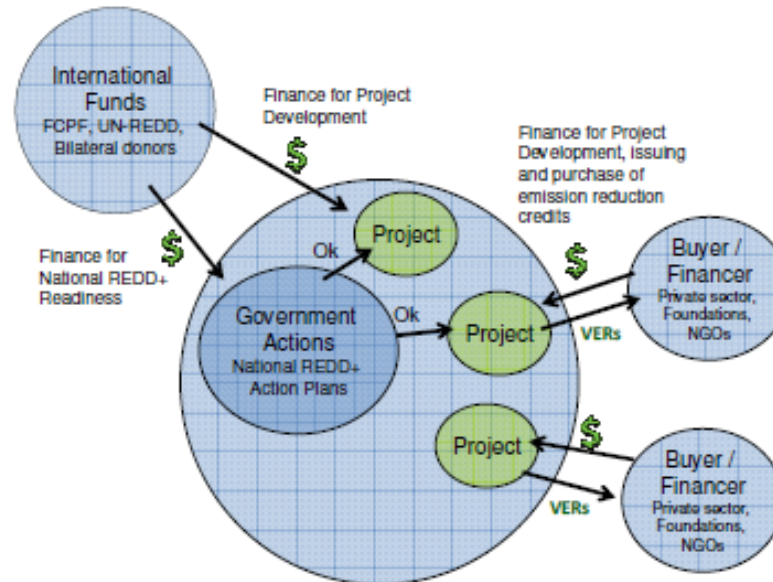


Concern over inaccuracies and scope for alterations:

- Complexity of steps
- Number of decisions involved
- Accumulation of primary and secondary data involved
- Process is costly and time-consuming when speed is priority of those involved

# Linking Forest Carbon and REDD+

## Current Landscape



Challenge when two levels running concurrently:

How carbon credits are accounted for (ongoing debate)

Options: national only approach, sub national only approach, **combination**



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**PAC REDD: Introduction to Module 3**

**Corruptions Risks in Forest Carbon and REDD+**

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# Contents

- Why REDD+ / Forest Carbon may attract corruption
- Framework for assessing REDD/FC corruption risks
- Introduction to actors/stakeholders

# Susceptibility to Corruption

- Large influx of money
- Need to develop legislation and processes:
  - Development of new government bodies
  - Allocation of REDD+ project areas
  - Allocation of carbon rights
  - Development of benefit sharing mechanisms
- Existing levels of corruption in the country
- Characteristics of REDD can tempt corruption (see next)

# These key characteristics:

## **STRUCTURES**

- Geographical location of resources
- Physical characteristics – intangible
- High Rents

## **INSTITUTIONS**

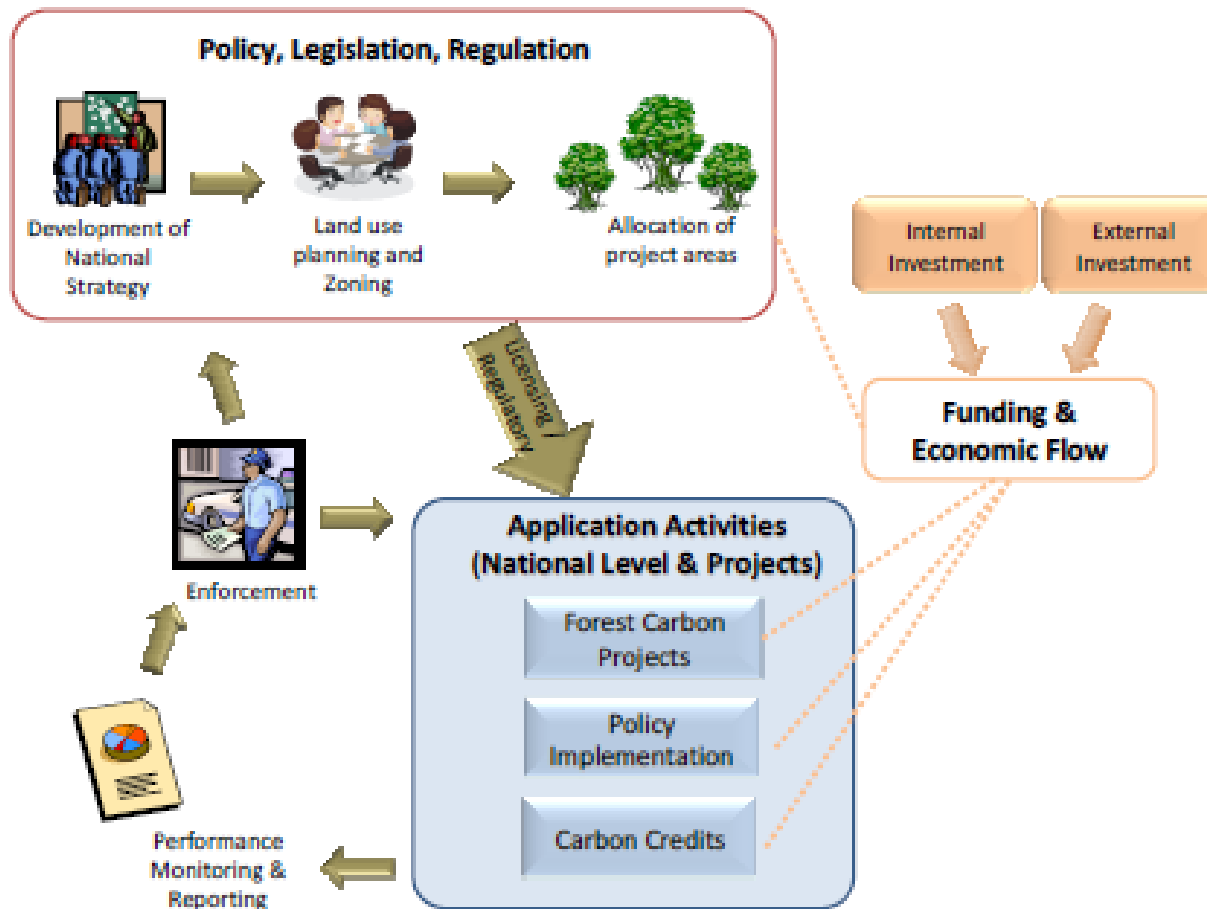
- Complex Processes
- International Nature

## **POLITICAL PROCESS**

- Uncertainty over future of REDD+

# Framework for assessment

Why do we need a framework?



(For both REDD+ and forest carbon projects)

# Policy, Legislation, Regulation

Overarching policies, rules, regulations governing how actors operate

Examples - Use with Annex A3 & A4

Activity areas	Areas of potential corruption risk
Allocation of Carbon Rights	Decisions on who owns the carbon held in forests and who has the right to buy and sell carbon credits
Changes to land tenure	Potential reforms to existing land tenure legislation – this will likely be coupled to decisions on how carbon rights are held
Land-use zoning plans	Developing plans of where actions for REDD+ and forest carbon projects can taken place
Contractual and Legal Obligations	Quality and equity of contracted agreements

Others?

# Funding and Economic Flow

\$ for strategy development, \$ for performance, \$ from taxes, \$ used to benefit forest communities

Examples - Use with Annex A3 & A4

Activity areas	Areas of potential corruption risk
Use of Donor funds	Donor funds are entering countries to support Readiness activities – there may be a pressure to utilise these rapidly to meet international deadlines
Sale of credits in the voluntary market	Some credits are being sold to the voluntary market from projects – important to monitor how are these credits calculated and by whom, who is selling these and to where, and what happens to the revenue
Benefit sharing within projects	Benefit sharing mechanisms have been developed in a number of projects – how these funds are being utilised and who gains access to them
Due diligence of external investments	Many new firms are entering the market for climate investment, some will be reputable, others potentially corrupt

Others?

# Application Activities

Decisions made and activities undertaken in developing and implementing a forest carbon project and a national level strategy

Activity areas	Areas of potential corruption risk
Establishment of a regulatory agency	A regulatory agency may be developed to manage and monitor the developments at national and project levels – who is responsible for this and its relationship with the government will be key to the credibility of REDD+ and forest carbon projects
Development of reference emission levels	Reference levels – which may be based not only on tonnes of CO2 emissions but also forest area, ecosystem values, etc. - need to be developed by project developers and at the national level. This requires transparent measurements and calculations, trusted data sources and means of verification methodology against a standard as there is much room for manipulation at this point.
Implementation of consultation processes	Consultations on both national and project developments should form integral parts of both processes and must include safeguard activities

Others?

# Performance monitoring and reporting

Helps ensure the operation of the other four chains:  
policy, funding, application, enforcement

Examples - Use with Annex A3 & A4

Activity areas	Areas of potential corruption risk
Monitoring of changes in emission levels	Changes in emission levels are the core element of REDD+ and forest carbon projects it is essential that these are effectively monitored and reported on
Monitoring of financial flows	Monitoring and reporting on financial flows will be critical to maintaining an effective and transparent system
Monitoring of adherence to standards	Voluntary standards exist at present with others being debated at international and national levels – monitoring that these standards are adhered to and reporting successes and failures will be critical

Others?

# Enforcement

Without enforcement there is little incentive for actors to adhere to legislation and forego corruption

Examples - Use with Annex A3 & A4

Activity areas	Overview of activity
Prosecution of illegality	Prosecution of illegality is the most fundamental element of enforcement – it can be broken down into more specific areas but will require an effective and appropriately trained police force and judiciary
Removal of award of performance based payments	Standards are issues to provide guarantees of quality – if these are not met certifications, and subsequent performance based payments, must be retracted even if this can be damaging in the short term
Retraction of donor funds	Donors are looking to provide initial incentives to promote action – this will shift increasingly to performance based payments – if these payments continue without evidence or contrary to agreed performance targets they will cease to be effective

Others?

# Actors and Stakeholders

## Actors:

Those that are directly responsible for the implementation of a practice or activity

## Stakeholders:

A group or individual that feels the impacts of that activity / decision but is not necessarily directly engaged in it

Both groups will be important to applying the framework:

Active: they will fill out the framework with you (have knowledge)

Passive: actors need to be mapped alongside risks identified

# Actors and Stakeholders

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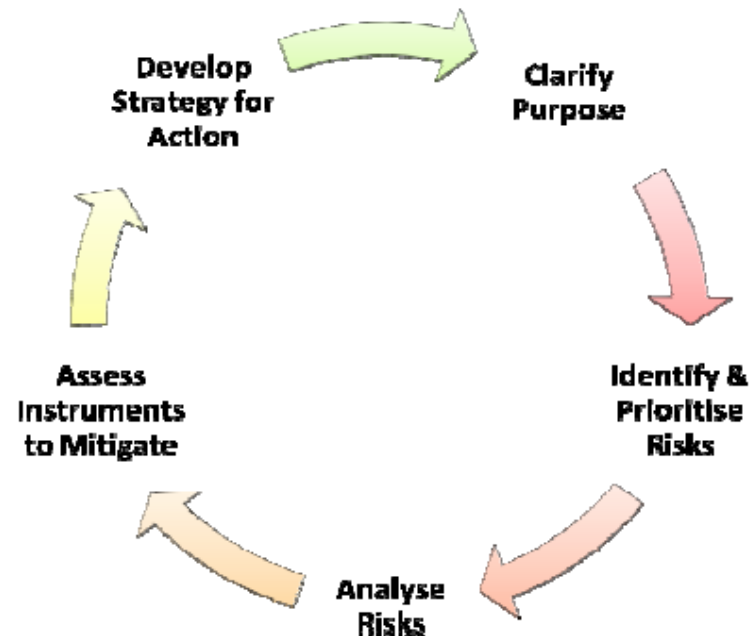
Passive: actors need to be mapped alongside risks identified

# Review SH analysis

- Review SH analysis conducted by unit
- Are all SH groups covered?
- Power / Interest grid completed?
- Do you understand SHs? (Annex B2, section 3 questions)

# Contents

- Step 1 – Identify purpose, scope and approach
- Step 2 – Identify and prioritize corruption risks
- Step 3 – Analyze root causes of priority corruption risks
- Step 4 – Identify instruments to support integrity
- Step 5 – developing a strategy for action



# Step 1 – What do we want to achieve and how?

## Outputs:

- Map of key actors in forest carbon & REDD (updated)
- Clear outline of the objectives and scope of the assessment
- Clear outline of potential approaches

## Key Questions:

Why do we want to do this assessment?

Who will use the results?

Is there a particular aspect of REDD+ / FC we want to address?

Who should be involved in the assessment, for what purpose?\*

What approaches should we use in the assessment?

# Step 1 – What do we want to achieve and how?

**What approaches should we use in the assessment? NB p.50**

## **Options:**

Expert Analysis	potential starting point (p.49)
Workshops	transparent, costly, contentious
Small Scale Meetings	comfortable for SHs, feed in to broader workshop
Expert Working Group	engagement throughout the process

## **In choosing approach questions to ask:**

- Which approach is most relevant for the SH group in question?
- How does the approach contribute to the achievement of your objective?
- What extra information do they need to know? How?
- What information do you need from them?

# Step 2 – Identify and Prioritize Risks

Outputs:

- Stakeholders introduced to the assessment\*
- Agreement on status of REDD+ and FC in the country
- Key risks identified through stakeholder meetings
- Persons likely to be engaged in associated activities identified
- Key risks prioritized

Note: at each step the manual should be adapted for local situation

# Step 2 – Identify and Prioritize Risks

## Key Preparation

- Stakeholders introduced to the assessment framework (M3)
  - Introduction of framework as method of facilitating thinking
  - Go through each element individually
  - Apply framework to other sector if useful to aid understanding
  
- Agreement on status of REDD+ and FC in the country
  - Using annex A1, A2 present draft
  - Seek input and finalize the picture (remains live document)

# Step 2 – Identify and Prioritize Risks

- Key risks identified through stakeholder meetings

Using completed A1&/A2, fill in A3 &/ A4 (the framework)

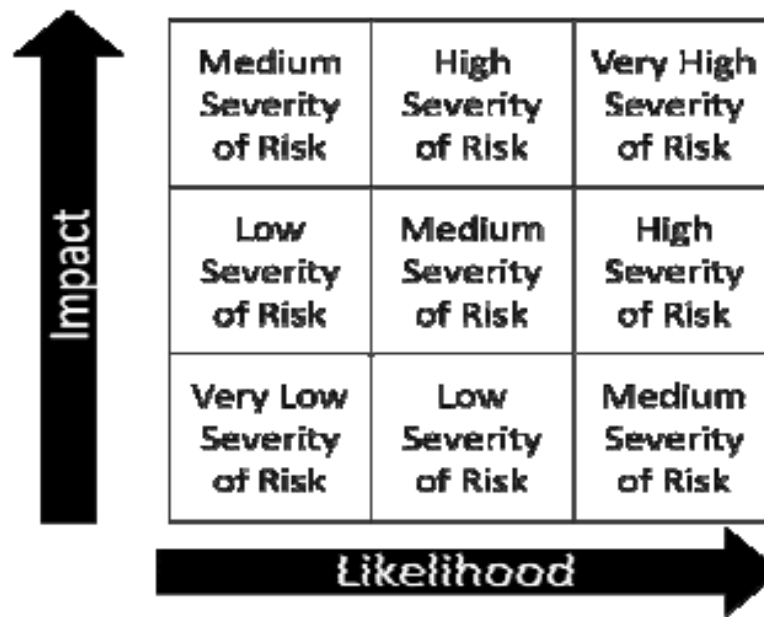
- activities
- corruption risk
- corrupt practices
- actors

Activity	Actors Involved		Corruption Risk	Associated Corrupt Practice
	National	Sub-National / Local		
<b>Policy Legislation and Regulation</b> – areas of policy formulation required during the 'readiness' phase				
<b>Allocation of Carbon Rights - Licensing</b>	MoF and/or Min Environment/Other authority; Political elites, international and national logging companies, agribusiness	Project developer, local elite, Indigenous communities, forest dependent communities,	Inequitable allocation of carbon rights to favour political elites.  Implementation compromised by regulatory agency activity already present – i.e. forest management, public sector auctions	<b>Undue Influence or bribery</b> – to link carbon rights to state-owned land titles or logging concessions excluding customary rights or communities from having control over the carbon and potentially the revenues.

# Step 2 – Identify and Prioritize Risks

- Key risks prioritized

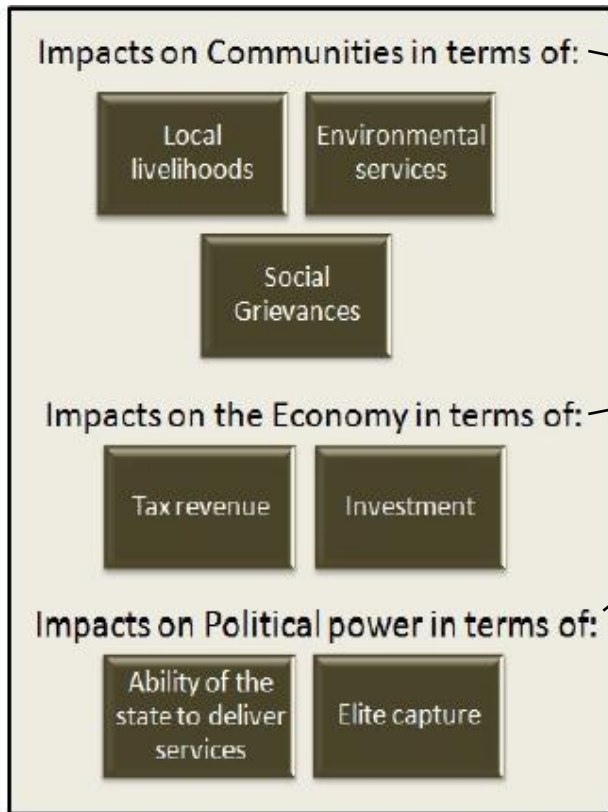
Severity of Risk = Impact x Likelihood



Concern: subjective exercise

# Step 2 – Identify and Prioritize Risks

## ■ IMPACT (Annex A4)

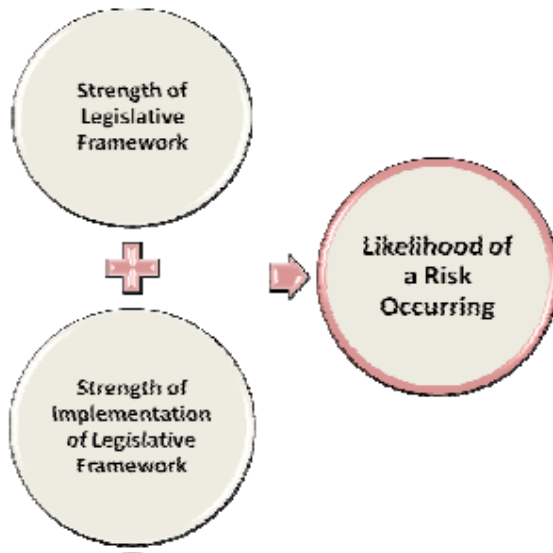


RANK	Level Of Impact	Consequence		
		Governance	Human	Financial
1	INSIGNIFICANT/NIL	No impact	None	\$0
2	MINOR	No undermined	Few individuals	< \$ thousand
3	MODERATE	If stopped, would recover rapidly	Many individuals	\$ thousands - millions
4	MAJOR	Even if corrected, would be compromised for some time	Many individuals	\$ millions - billions
5	CATASTROPHIC	Irreparably undermined	National	\$ billions

Important: keep comments on how scores reached

# Step 2 – Identify and Prioritize Risks

## ■ Likelihood (Annex A4)



RANK	OCCURANCE	PROBABILITY	DESCRIPTION
5	ALMOST CERTAIN	1 in 10 chance	LIKELY TO OCCUR
4	LIKELY	1 in 100 chance	WILL PROBABLY OCCUR
3	POSSIBLE	1 in 1000 chance	MAY OCCUR OCCASIONALLY
2	UNLIKELY	1 in 10,000 chance	DO NOT EXPECT TO HAPPEN
1	RARE	1 in 100,000 chance	DO NOT BELIEVE WILL EVER HAPPEN

Important: keep comments on how scores reached

# Step 2 – Identify and Prioritize Risks

- Impact x Likelihood Ranking

			Insignificant	Minor	Moderate	Major	Catastrophic
LIKELIHOOD	5	Almost Certain	Low	Significant	High	High	High
	4	Likely	Low	Significant	Significant	High	High
	3	Possible	Low	Low	Significant	High	High
	2	Unlikely	Very Low	Low	Significant	Significant	Significant
	1	Rare	Very Low	Very Low	Low	Low	Significant
IMPACT			1	2	3	4	5
RISK	Impact X Likelihood 1 - 25						

# Step 2 – Identify and Prioritize Risks

Output at this stage:

Activity	Actors Involved		Corruption Risk	Associated Corrupt Practice	Ranking (1-5)		Risk
	National	Sub-National / Local			Impact	Likelihood	Impact x Likelihood
<b>Policy Legislation and Regulation</b> – areas of policy formulation required during the 'readiness' phase and how they interact with existing policy and regulation							
<b>Design and development of National REDD+ Strategy</b>	Political elites, international and national logging companies, agribusiness (oil palm, sugar cane, jatropha etc), military	Logging and agribusiness companies - local and international, political elite	Design a REDD+ strategy that is preferential to specific actors Can result in identification of strategies favourable to particular interests only. Skewing land use policy	<b>Undue influence; Bribery:</b> to officials to ignore information <b>Bribery or Fraud:</b> by international consultant to influence REDD+ planning and gain contract	5	3	15

Note: Validation of the results will be critical in order to build consensus on where efforts should be focused!

# Step 3 – Analyzing root causes of priority risks



## Why do we analyse the root causes?

Analyzing root causes facilitates identifying strategies to address corruption

### Outputs:

- Commonalities between priority risks identified
- Root causes of corruption identified for each priority risk
- Stakeholders and their roles in addressing risks identified

# Step 3 – Analyzing root causes of priority risks

**Root Causes = Motivations + Situational Factors**

Motivation                      Subjective and hard to change

Situational Factors            Influence whether an individual can act on corrupt motives

## **Motivation**

- Whose interests are served by a corrupt practice continuing / being stopped?
- How powerful is the key actor identified as associated with this risk? Who do they influence?

## **Situational Factors**

### *Structures*

- What is the governance structure impacted by this risk?
- Where is the resource located and how important is it to national / regional economics?
- What effect does regional security have on the stability of the political stability of the country?

### *Institutions*

- What type of state exists – democratic, autocratic?
- What is more important in the running of the state – formal regulations or informal alliances?
- What type of capacity is there / lacking (e.g. technical capacity, operational capacity)?
- Which specific activities are affected by the lack of capacity? (e.g. detection, investigation, enforcement/levying of sanctions)

### *Political processes*

- What are the political barriers to implementation of legislation?
- Where does the power to maintain/stop corruption come from – economic support, political support, social ties?
- What trends can influence this power?
- What other social groups do the ruling elite have to listen to?

# Step 3 – Analyzing root causes of priority risks

Priority Corruption Risk	Level at which Risk occurs	Possible Root Cause(s)
<b>Policy Legislation and Regulation</b>		
<p><i>Design of a REDD+ strategy</i></p> <p>Strategy designed that is preferential to specific actors with vested interest, skewing land use policy.</p>	National	<p>Highly valuable resource with complex management as it is not physical (<i>situational</i>)</p> <p>Institutions / authority for managing REDD+ not clearly defined (<i>institutional</i>)</p> <p>Legislation specifically relating to management of forest carbon is not in place (<i>political</i>)</p>

## Step 4 – Identifying instruments to support integrity



Outputs:

- Current instruments addressing these risks identified
- Gaps in these instruments identified
- Options for strengthening existing instruments identified
- Potential new instruments required identified

# Step 4 – Identifying instruments to support integrity



Current instruments addressing these risks identified (Annex A5, 6)

- Legal Instruments
- Non-Legal Initiatives
- Independent Monitoring and Research
- Citizen centered anti-corruption programmes / projects

## ■ Why identify instruments?

- To identify whether an “instrument” is missing
- To identify whether the problem is in implementation

# Step 4 – Identifying instruments to support integrity



## Useful questions in assessing the instruments / identifying gaps:

1. What instruments are currently in place for each risk area?
2. Have they been reformed recently?
3. How are they available to the public?

Existence of Instrument

## Additional Questions for Legal Instruments:

4. Who makes the laws and regulations?
5. Who enforces them?
6. How high is their capacity (operational and technical)?
7. What is their political will in terms of implementing?
8. How are the laws implemented?
9. How are they enforced?
10. What role does Civil Society play?

People involved with  
design & enforcement

Implementation and  
enforcement

# Step 4 – Identifying instruments to support integrity

## Format – A7

Priority Corruption Risk	Level at which Risk occurs	Possible Root Cause(s)	Instruments to address cause	Effectiveness of Instrument	Change Required (New Instrument /improved instrument)
<b>Application Activities</b> – to cover all activities likely to be part of implementation of the forest carbon project, including safeguards.					
<p><i>Development of project baseline reference emission levels:</i></p> <p>False baseline given to enhance emissions derived from project</p> <p>Provision of false information or monopoly of national or local data</p>	Project level	<p>High potential market value of resource and complex methodology for measuring (<i>situational</i>)</p> <p>No qualified national institutions for oversight (<i>institutional</i>)</p> <p>No legislation specifically addressing carbon measurement (<i>political</i>)</p>	Voluntary standards for forest carbon projects	<p>Methodology still in development</p> <p>Standards are voluntary and methodology complex so difficult to assess.</p>	<p>Independent monitoring to ensure standards are followed</p> <p>Agreement or treaty on methodology for establishing reference levels.</p>

# Step 5 – Developing a Strategy for Action



## Outputs:

- A clear action plan identified for follow up on the results of the research – where to take action for maximum impact

## Critical issues:

- Review original objectives
- Review resources
- Big or small wins?
- Include advocacy, role of Civil Society, development of instruments

# Annexes

## Active Templates – Annex A

**A1** Checklist for REDD+ Status

**A2** Checklist for FC status

**A3** Generic map for REDD+ risks

**A4** Generic map for FC risks

**A5** Existing anti-corruption instruments

**A6** Legislation checklist

**A7** Map for root causes and instruments

## Resources – Annex B

**B1** FC and National REDD+ Links

**B2** Stakeholder Mapping

**B3** Other resources and Glossary