

10/3/2019

Dear Mary,

Per our email exchange please find the combined comments from the following people:

Jeff Silverman, Senior Manager Sustainable Finance, USAID Greening Prey Lang  
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Jeff is a REDD+ practitioner since 2008 having worked on REDD+ projects in South America, East Africa, and Southeast Asia. I have been working on REDD+ in Cambodia since 2010 with the last 5 years in country. I am currently with the USAID Greening Prey Lang Project in Cambodia which includes an effort to support the development of nested REDD+ in way that meets national objectives and provides critical finance towards forest conservation.

Carlos Riano, MRV Specialist, UNDP  
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Carlos was the REDD Chief Technical Advisor for FAO Cote D'Ivoire country office for about 2 years where he involved in the preparation of the National REDD Strategy and provision of technical support on the legal and institutional aspects of REDD. Prior to that, he worked with FAO Congo Republic in the capacity of technical advisor for more than 3 years. He also has some consultancy experiences in REDD with various institutions including working with the government of Colombia. As the REDD+ MRV Specialist in Cambodia, he ensure timely delivery of outputs and activities under FCPF, provide quality advice and technical guidance on issues related to forest monitoring and inventory, remote sensing of land use, and GHG inventory compilation, and support to project management team.

Quentin Renard, Technical Specialist, UNDP  
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Currently working as a REDD+ Technical Specialist for UNDP in Cambodia, Quentin provides technical advisory support to the Government of Cambodia to move from REDD+ readiness to REDD+ implementation, notably through the development of the REDD+ Action and Investment Plan and through mobilizing resources for its implementation. Prior to joining UNDP, Quentin worked as a forestry expert for FAO in various regional and country offices in West and Central Africa as well as in South-East Asia, where he was directly involved in the design of REDD+ national strategies and national forest monitoring systems. In its capacity of Chief Technical Advisor in DR Congo between 2016 and 2018, Quentin was notably responsible for the development and implementation of the DR Congo National Forest Inventory.

#### Combined Comments

The Royal Government of Cambodia is making important strides by nesting REDD+ projects within the national REDD+ program. Aligned with national Forest Reference Level, MRV accounting and including a national safeguards framework, these nested projects will avoid double counting, emissions displacement and over/under estimation of emission reductions,

while empowering local communities to sustainable work in forest lands and support national commitments on emission reductions like the ones described in the NDC.

The scale of these projects is manageable for aligning activities with demonstrable avoided deforestation results, and for the complex task of ensuring equitable and effective benefit sharing and robust safeguards. Prior experience with many REDD+ projects is not an indicative of the potential these represent due to the historic lack of carbon finance – they were simply donor supported conservation programs. However, the advent of increased commercial voluntary interest and emerging compliance markets carbon finance is becoming a reality and an engine to properly and sustainably operate project scale REDD+ activities that can be better support with the operationalization of the Paris Agreement, specially the article 6. For example, the governments Seima REDD+ project in Mondulkiri province of Cambodia has been sustainably financed through carbon sales since 2016. In fact, the project allows the government to pay their own management costs, covering conservation activities like ranger patrols and park operations. Moreover, the 50% of carbon sale net after operating costs project's sales are reinvest into the community.

Site based monitoring provides transparent accounting of results that assure investors of the success avoid avoided deforestation and community livelihood improvements as well providing important data to the National Forest Monitoring System and the Safeguards Information System. We find that combining the top down policy-based approach more recently spearheaded by Norway and represented in the TREES draft with a bottom up project approach results in the best of both worlds allowing targeted critical finance to specific conservation areas while also supporting the broader enabling environment for national improvements in land use management for forest conservation. We strongly feel that TREES will provide a more resourceful toolkit to broaden the impact of the standard by including these nesting mechanisms in a way that is aligned and harmonized with the overall national approach.