Final evaluation of the "REDD+ Governance and Finance Integrity for Africa" programme

16 January 2018





### Glossary

ALAC	Advocacy and Legal Advice Center	NDC	Nationally Determined Contribution
ВСР	Bio Carbon Partners	Programme	TI's programme on REDD+ governance and financial integrity in Africa
BH	Bio-Hub	RDC	Rural District Council
CAFI	Central African Forest Initiative		
CIF	Climate Investment Fund	REDD+	Reducing emissions from deforestation and forest degradation as well as conservation, sustainable
CGA	Carbon Green Africa		management of forests and enhancement of forest carbon stocks
CNB	Community Notice Boards	REDD+IN	REDD+ Governance and Finance Integrity for Africa
СОР	Conference of the Parties	22211	
CRA	Corruption Risk Assessment	RPDH	La Recontre pour la Paix et les Droits de l'Homme
FC	Forestry Commission	SDG	Sustainable Development Goals
FCPF	Forest Carbon Partnership Facility	SNOIE	Standardised External Independent Monitoring System
FD	Forestry Department	TI-C	Transparency International Cameroon
FIP	Forest Investment Partnership	TI-EU	Transparency International European Union
FLEGT	Forest Law Enforcement, Governance and Trade	TI-S	Transparency International Secretariat
GCF	The Green Climate Fund	TI-Z	Transparency International Zambia
GII	Ghana Integrity Initiative	TI-ZW	Transparency International Zimbabwe
HIA	Hotspot Intervention Area	UNDP	United Nations Development Programme
ICCS	Interim Climate Change Secretariat	UNFCCC	United Nations Framework Convention on
IUCN	International Union for Conservation of Nature		Climate Change
LICOCO	Ligue Congolaise de lutte Contre la Corruption	ZCCN	Zambian Climate Change Network
MSP	Multi Stakeholder Platform		

#### Contents



## Introduction

#### Introduction

REDD+ is a climate change mitigation solution being developed by parties to the United Nations Framework Convention on Climate Change (UNFCC).

REDD+ incentivises developing countries to keep their forests standing by offering result-based payments for actions to reduce or remove forest carbon emissions.

Source: www.unredd.net/about/what-is-redd-plus.html

From its outset in 2008, it has been intended that REDD+ not only contribute towards the reduction of carbon dioxide emissions in the atmosphere but also provide benefits to indigenous people, forest dwelling communities and developing countries in which large tracts of tropical forests remain. For this to happen, every effort must be made to ensure that REDD+ works well to achieve these important goals.

Addressing the risks of corruption should be high on the agenda in relation to REDD+. Corruption can not only decrease the effectiveness and efficiency of REDD+ efforts, but also contribute to inequality by unfairly denying certain communities or vulnerable groups (e.g. the poor, ethnic minorities, women, etc.) from participating or benefiting appropriately from REDD+ projects.

Therefore, TI has initiated the programme\*, REDD+ Governance and Finance Integrity for Africa, as part of TI's wider work with integrity and climate finance. The main objective of the programme is to improve the overall governance and financial integrity of the REDD+ projects and processes being run in six African countries (Ghana, Cameroon, Zambia, Zimbabwe, DR Congo and Republic of Congo). The programme comprises three key result areas, set out on the next page together with the related activities and targets.

This report is an independent, final evaluation of the REDD+ Governance and Finance Integrity for Africa programme. The programme commenced in 2014 and focused on the countries of Ghana, Cameroon, Zambia and Zimbabwe. DR Congo and Congo were incorporated in 2016. Global and regional activities, primarily facilitated by the TI secretariat (TI-S) and the TI EU office, are also a significant component. The part of the programme funded by the EC closed on 31 October 2017. Another part funded by AFD will continue until 30 June 2018 in Cameroon, DRC, and RC. This report includes a description of the main programme components and status, together with the usual evaluation criteria, lessons learned and recommendations.

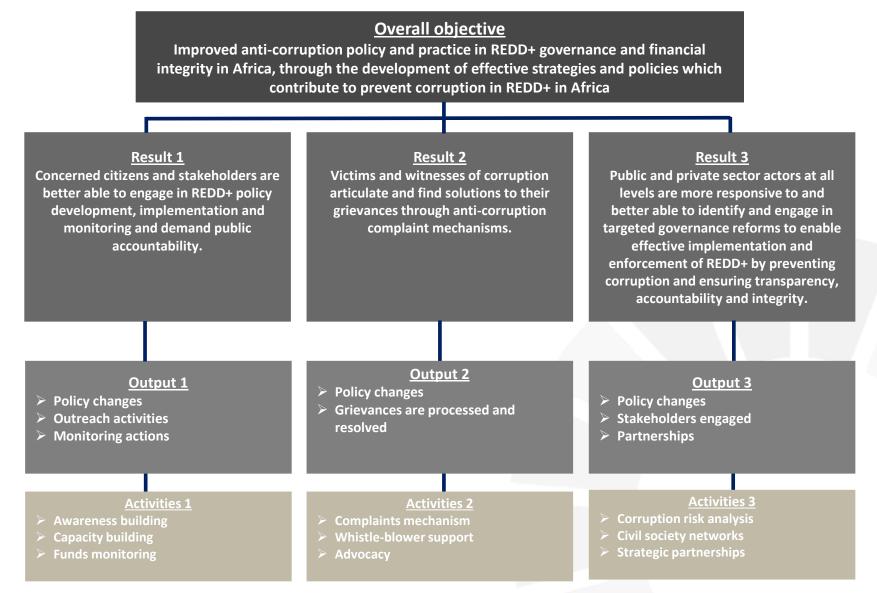
#### **Overview of three phases of REDD+ implementation**



Source: EU REDD Facility: Introduction to REDD+ (2014)

\* The term "programme" is used to refer to TI's "REDD+ governance and financial integrity in Africa" initiative, and the term "project" is used to refer to the REDD+ activities in each country.

## **Programme overview: REDD+ Governance and Finance Integrity (REDD+ Governance and Finance Integrity for Africa)**





Achievements and challenges

The REDD+ Governance and Finance Integrity for Africa programme is a very ambitious programme. Set out here are some of the more important positive aspects of the programme, together with the chief challenges.

#### Positive aspects:

- Both at global and country level, there is now wide recognition of the potential corruption issues in forestry programmes by the public sector and civil society.
- There is also increased recognition of TI as an authority in the area of climate finance and corruption as a result of the programme, and especially the development of the country risk assessments.
- The programme has had visible impact in terms of building awareness among civil society organisations, and helped them to acknowledge and understand the issues of corruption in the forest and land industries
- The programme has enabled **civil society to tackle** the topic of corruption in relation to forests and land.
- There has been some success in **shaping national and international policy** relating to governance and transparency of forestry initiatives, to the extent that the political climate has allowed.
- The country risk assessments (CRAs) developed during country programmes, will serve as an ongoing tool in anti-corruption programmes targeting forestry and land, and has helped cement relations with relevant stakeholders.
- Grievance mechanisms are now actively used in the land sector in the countries involved in the programme. These include TI's own Advocacy and legal advice Centres (ALACs) as well as new channels in the case of Cameroon, DRC and RC.
- Competent and committed teams are engaged within TI at local and global level. They have recognition in the area of anti-corruption and climate finance, and are actively sharing knowledge between themselves.
- All the TI chapters have been successful in setting up relevant partnerships during the programme period. While these partnerships differ in focus and context, they all provide value to the programme in terms of securing the sustainability of the project.

On the following page is a summary of the overall performance in relation to the evaluation criteria. Following that is an overview of the types of recommendations to be addressed.

#### **Challenges:**

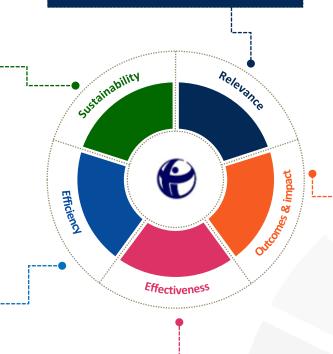
- Identifying the countries where the benefits can be most significant in terms of the combination of forestry activities and countries where TI have sufficient competencies, is complex.
- The breadth of REDD+ activities, in terms of the nature and timing of projects and the geographical locations in the countries concerned, presents considerable logistical efforts and practical difficulties.
- Engagement with the **private sector** in this programme has been limited and requires a particular skill set and experience.
- The **political climate** in the countries concerned means the approach taken to influence policy needs to be tailored and diplomatic.
- **Donor organisations** do not always take sufficient steps to ensure that anti-corruption is inherent in forestry programmes.
- The TI programmes have been limited by the quality of relevant stakeholders in the countries concerned. These limitations include low levels of anti-corruption and REDD+ knowledge among key stakeholders, poorly organised CSO environments, and lack of cooperative public institutions.
- The TI programme has had to address the general lack of information, particularly in communities where there was an unmet need to improve the knowledge of information on forestry matters, corruption and REDD+.
- Developing grievance mechanisms which function well in all cultures is a challenge. In some countries it has been difficult to get the local population engaged in reporting directly through the established grievance channels. In other countries it has been difficult to establish grievance mechanisms which satisfies both local communities and public institutions.
- Most chapters have had difficulties in developing **exit strategies** due to the level of REDD+ activities and other forestry programmes in the countries, as well as the overall delay of the REDD+ process, making it difficult predicting the extent and timing of REDD+ activities.

Evaluation criteria

- The nature and status of REDD+ has been hard to predict throughout the programme, so no formal exit strategy has been developed overall. We understand funding has been secured for continued activities in Cameroon, DRC and RC and that other chapters are being actively supported by TI-S in efforts to secure further funding.
- Some communities and other CSOs have become dependent on TI's ongoing involvement
- Even where effective Multi Stakeholder Platforms (MSPs) have been developed, the ongoing involvement of TI is seen as critical in respect of matters relating to governance
- The status of the national REDD+ programmes are such that critical steps still need to be taken in building and operating safeguards and monitoring controls
- There is intense competition from a large number of CSOs for funding in the area of forestry and governance issues related to REDD+ making the establishment of further funding difficult.
- The country risk assessment process has taken a significant amount of time to complete, although it has been an efficient tool in raising awareness about corruption as well as created an effective platform for TI to be recognised and to connect with partners.
- Outreach activities are mostly in remote areas which take significant time and resources to service.
- TI has played a much greater role in informing communities of forestry matters in general and not just corruption, owing to poor engagement on the part of implementers and/or public sector representatives.
- The national TI chapters have been closely involved in project management, and have shared knowledge through monthly calls and annual meetings which has contributed to efficiency.

• The three result areas are relevant as mechanism to achieve the programme objectives.

- The countries concerned are relevant to the programme in hand.
- More activities to engage global donors and institutions in developing governance mechanisms targeting corruption in REDD+ programmes should be considered as part of the programme.



- All the TI chapters have undertaken relevant activities within all the three key areas under the programme.
- Local communities have been informed in general about forestry matters by TI and are better able to challenge REDD+ implementers.
- A number of grievances have been reported and some have been satisfactorily resolved.
- The chapters have established strong partnerships throughout the project, which have helped endorse TI as a governance specialist among both civil society organisations and public institutions.
- Safeguards and monitoring mechanisms in relations to REDD+ in the main countries now take at least some account of corruption risks.
- In some countries, relationships between TI and the public sector have been improved.
- TI has been instrumental in developing the expertise of other CSOs in terms of corruption and forestry management.
- At a global level, there is recognition that corruption risks are significant in matters relating to forests and REDD+.

- Outreach activities, whilst they are time-consuming and resource intensive, are very effective in tackling forestry matters relating to corruption.
- The effectiveness of ALAC as a grievance mechanism is variable, but the chapters have adapted mechanisms to ensure citizens air their grievances in an appropriate manner.
- Engagement with global forestry-related bodies was undertaken relatively late in the programme, but is now effective.
- The effectiveness of chapters in engaging with relevant public sector bodies is highly dependent on the political situation.
- All chapters have expressed satisfaction with the support they have received from the TI secretariat both in terms of creating the network, providing tools and support, and creating the global platform.

Recommendations

#### **Significant matters**

• Determine the next steps in terms of TI involvement in ongoing forestry and REDD+ programmes, including funding opportunities

- Facilitate cross chapter co-ordination on forestry and land-related programmes from the earliest possible opportunity
- Formal ongoing assessment of global, regional and local stakeholders in light of the status of REDD+ initiatives to identify the most effective and efficient actions
- Consider the role TI could play in helping civil society broaden their understanding of REDD+ initiatives by facilitating a cross-border knowledge exchange
- Follow-up on public sector engagement opportunities in relevant countries, especially where cooperation has been limited during the REDD+ Governance and Finance Integrity for Africa programme.
- Increase the leverage of CSOs and MSPs in the area of natural resources
- Ensure input to policies is formalised

#### **Important matters**

- Discuss potential business integrity activities that could add value in the REDD+ Governance and Finance Integrity for Africa programme in terms of engaging with the private sector
- Consider the need to establish formal partnership agreements with key organisations, where arrangements have not yet been formalised
- Develop and Implement a project risk management approach on all programmes
- Develop a social media plan
- Ensure TI chapters are equipped to provide independent input to policies and to maintain relationships on an appropriate basis

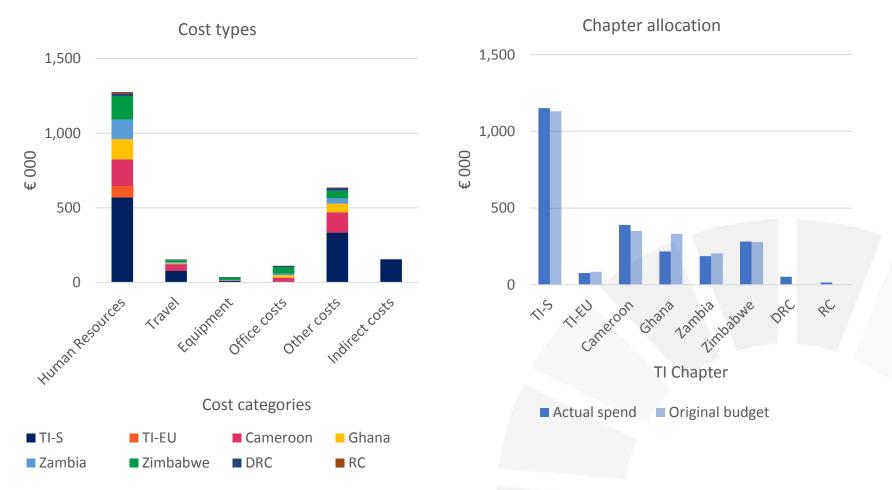
#### For consideration

- Ensure that formal recommendations and comments on anti-corruption are provided to key stakeholders in a simple printed format (brochures, 2-pagers e.g.)
- Consider activities that can influence donor organisations to embed governance and financial integrity in contracts with REDD+ implementers

A full inventory of recommendations by country is included below in section 06. Set out here is a summary of the more important themes to be actioned. The information included below is based on data provided as at 30 September 2017, before the programme was finalized. Also, in the original proposal, no resources were allocated for RC and DRC.

#### **Executive summary**

Financial overview



The programme finances have been well managed overall, with close project monitoring and reallocation of resources, where appropriate. The allocation of expenditure to categories and countries, is commensurate with the overall results sought by the project. Further comments are set out below in section 04. "Other costs" are primarily conference costs and indirect costs is a 7% uplift on the overall costs for TI-S.

# 02

**Programme overview** 

#### **REDD+ and integrity** Achievements summary

#### Cameroon:

- REDD+ projects ongoing across the country
- Outreach activities by TI-C leverage local CSO focal points
- ISO certified grievance mechanism operated by a local CSO, engaging TI-C to undertake communication and follow-up
- Engagement with public sector committees addressing governance and financial integrity matters

#### Ghana:

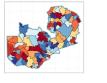
- REDD+ projects ongoing across the country
- Extensive outreach activities by GII developed local MSP platforms in some areas
- Relevant public sector stakeholders have been included in outreach activities
- ALAC process established and processing cases
- Engagement with public sector has been difficult owing to the distraction of elections, but is now developing

#### Zambia:

- REDD+ projects ongoing in limited regions
- Outreach activities by TI-Z developed community notice boards (CNBs), who function as local focal points and educators of the communities
- Effective collaboration with many stakeholders, including private sector implementers
- ALAC process is functioning, limited cases
- Shortage of effective multi-stakeholder platforms (MSPs) that can be leveraged in the country, making it difficult to work with a broader aspect of civil society
- Engagement with public sector committees addressing governance and financial integrity matters

#### Zimbabwe:

- REDD+ projects ongoing in limited regions
- Outreach activities by TI-ZW focused on one region, leveraging a broad range of public and private sector stakeholders
- ALAC process established and adapted to fit the local culture
- Strong engagement with public sector ministries and parliamentarians











#### DRC:

- Extensive REDD+ projects across broad geographical reach
- LICOCO have started outreach activities, representing TI
- Grievances are processed using TI's ALAC platform
- Engagement with public sector on improving safeguards and monitoring
- MSP and CSO collaboration under construction

#### RC:

- Extensive REDD+ projects ongoing
- Outreach activities by RDPH (representing TI) focused on media
- Grievances are investigated in collaboration with journalists
- Actively involved with public sector to develop relevant safeguards and monitoring
- Engagement with other CSOs

#### Regional and Global level (TI-EU and TI-S):

- Clear identification of the relationship between Sustainable development goal (SDG) 16 on peace justice and strong institutions with SDG 13 on climate action
- Targeting of the Open Government Partnership and push member countries to formulate commitments on climate transparency
- Participation in relevant international fora and conferences (including the COPs) to raise awareness and share findings and lessons learned with key donors, institutions, CSOs and governments
- Engagement with key global stakeholders including the UN-REDD programme, The UNFCCC, the FCPF, the FIP, the GCF, the CIF, FLEGT, UNDP and CAFI, who have to some extent included TI's recommendation on anti-corruption measures in relevant policies, codes, trainings and processes
- 99% of users report an increased level of knowledge after taking the REDD+ integrity e-learning developed by TI





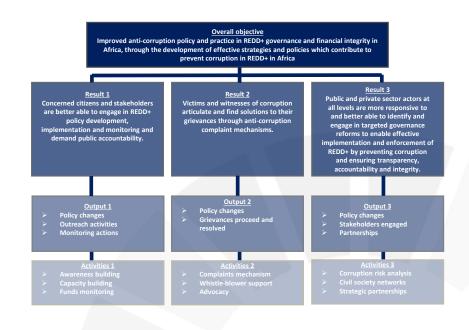


#### **REDD+ and integrity** Achievements

The consolidated achievements mapped to the results set out in the programme objectives defined by TI will be reported by TI to the donor in due course and are complementary to this report.

It is clear that there has been a significant improvement in the policies and practices in REDD+ governance and financial integrity in the countries where TI has exercised this programme.

The 3 "results" contribute to the objective in different measure, depending on a number of factors including the status of REDD+ projects, the stability and integrity of governments and the support provided by other CSO and MSPs in each of the countries concerned. The original programme proposal set out some defined overall measures for each of the outputs. These were not revisited in the light of these dynamic factors in each country and TI chapters struggled to report periodically against these metrics. Therefore we have not sought to verify the quantitative achievements set out in this section, but to evaluate the programme in section 04, on a qualitative basis.





Results	Targets	Achieved
Concerned citizens and stakeholders	A minimum of 70 public outreach activities take place in target countries, offering citizens quality information and tools enabling them to address REDD+ corruption issues.	139
are better able to engage in REDD+ policy development, implementation and monitoring and demand public	A minimum of 20 changes in the discourse, policy and/or practices in relation to REDD+ occur as a result of TI, civil society and citizen project monitoring.	23
accountability.	A minimum of 40 TI, civil society and citizen monitoring actions occur to demand accountability regarding REDD+ actions.	36
Victims and witnesses of corruption articulate and find solutions to their	80% of grievances are successfully resolved in target countries with chapters. This means the grievances are received, processed, and advice is offered (even if the complaint is not related to corruption).	90%
grievances through anticorruption complaint mechanisms.	A minimum of 20 changes in the discourse, policy and/or practices occur at the national level in target countries as a result of complaints submitted by victims and witness of corruption.	19
Public and private sector actors at all levels are more responsive to and	A minimum of 30 changes in discourse, policy and/or practices occur at the national, regional and global level as a result of TI evidence based advocacy.	45
better able to identify and engage in targeted governance reforms to enable effective implementation and	A total of at least 250 key national level stakeholders are engaged in addressing REDD+ corruption through participation in national networks established in target countries.	342
enforcement of REDD+ by preventing corruption and ensuring transparency, accountability and integrity.	Partnerships with public and private sector actors are established which lead to improved transparency, accountability and corruption prevention practices.	66



**Evaluation methodology** 

### Our approach



Our approach to the evaluation is to use the **engagement of selected stakeholders**, together with the **review of associated evidence**, to collect information and corroborate findings across the areas of <u>relevance</u>, <u>impact</u>, <u>effectiveness</u>, <u>efficiency</u> and <u>sustainability</u> of the programme. Our work focuses on **qualitative feedback** which is also supplemented by the quantitative feedback obtained by TI-S as part of the ongoing programme monitoring.

A **kick-off meeting** was held with TI-S in Berlin, to plan and orientate the work. From these discussions and relevant documentation regarding the countries, relevant stakeholders were identified and validated with TI-S. The stakeholders targeted were those that had a significant role in the REDD+ programme, relevant public sector organisations, other CSOs, fund providers and communities. The objective was to ensure there is sufficient depth to the evaluation and that there is opportunity to corroborate findings.

Stakeholder interviews with TI-S, TI-RC, DRC and international organisation representatives, were held by skype. All other interviews with stakeholders in Cameroon, Ghana, Zambia and Zimbabwe, were face to face. A full list of stakeholders interviewed as part of this process, are listed in Appendix I.

Our findings and recommendations have been **validated** by the relevant TI-chapters, TI-S and donors.

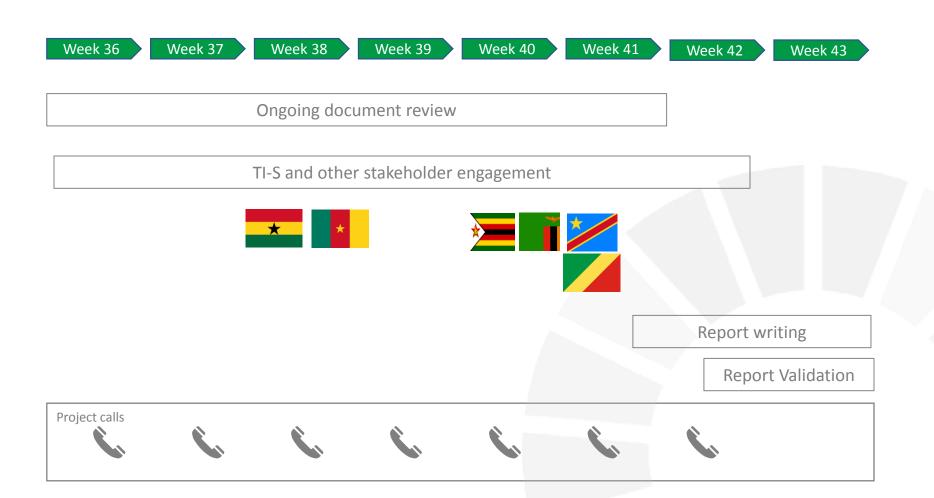
Set out on the following page is a summary of the activities undertaken during the evaluation, and a timeline.

### **Overview of approach**

We adopted a logical approach to our assignments and have set out below the high level view on the project, deliverables and what was done, when.

		Prepar	ation		Analysis		Repor	ting
SDG 💮 LEAD	<ul> <li>Prepai</li> <li>Facilită</li> <li>Identii</li> <li>Prepai</li> <li>approproduct</li> </ul>	ration of kick-o ation of kick-o fication of key ration of more ach and timeli ration of repor	ff meeting stakeholders detailed ne	materials <ul> <li>Follow-up of</li> <li>Workshops</li> <li>key stakeho</li> </ul>	view of additional of mid-term evaluati s and/or interviews v olders results and further f	vith •	Draft report Validation of report I TI-S and donors Update and issue fin	7 1 1
Week nu	mber	32	34	36	38	40	42	44
				Weekl	y project group	status m	neetings	
					Deliverab	les		
	• Docu • Stake • Conce	off meeting a ment require holder list ept note rting templat	ements listing	• Status u • Interviev • Detailed	w notes	:	Final report(s) Presentation of fir	ndings
	-					-		

Timeline



### Feedback on the approach



Using a stakeholder engagement process is essential to evaluate all aspects of the programme and to provide feedback in terms of lessons learned and recommendations. The number of potential stakeholders to include in the process is significant. Our approach sought to interview the most important of these in terms of their involvement with TI and the REDD+ process in general.

It has been difficult for the chapters to accommodate all of our requests owing to stakeholders' own priorities. There is a **variable level of commitment to the evaluation process** by stakeholders. Some specifically cited the need for increased publication of evaluations to enable CSOs generally to improve approaches. Others have made a significant effort to ensure their availability for the interview. On the other hand, we have not been able to interview all stakeholders, largely because they have not been willing or able to prioritise the interviews in their schedules.

In Cameroon, we have not visited one of the outreach locations owing to the practical difficulties of traveling there. In Zimbabwe, we have not been able to meet the REDD+ implementer, Carbon Green Africa, or one of the CSO partners, Bio Hub, who both cancelled appointments at short notice.

We have used the **country risk assessments** (CRAs) developed by the chapters in Cameroon, Ghana, Zambia, and Zimbabwe, to help establish the baseline in this evaluation since these documents highlight the issues in each country at the commencement of the programme. A description of the risk assessments for these countries can be found here www.transparency.org/whatwedo/publication/redd and corruption risks for africas forests case studies from camer oon gh

It has been challenging to assess the **sustainability** of the programme, since there is a lack of funding around forestry and related activities which means stakeholders have a vested interest in ensuring the ongoing support of all competent CSOs. Similarly with the efficiency of the programme – TI has compensated for some shortfalls in community engagement on the part of others, such as implementers and public sector representatives, so whilst they have fulfilled an essential function in informing communities, they have gone well beyond the focus on governance and financial integrity.

Overall, we feel we have sufficient information to undertake the evaluation, despite a few shortfall in stakeholder interviews. The chapter visits have given valuable insights on the work with the programme.

# 04

## Findings



#### **Consolidated response**

## **Relevance:** To what extent was the programme suitable to the priorities and policies of the target groups, TI-S and the donor organisation?

How relevant was the programme in the wider context of the fight against corruption and enhancing climate finance integrity?	<ul> <li>In all countries, the development of the CRA has helped to establish TI as a leading organisation on anti-corruption in land- and forestry issues and has improved engagement with other stakeholders operating in the broad area of forestry and natural resources.</li> <li>TI chapters have been engaged in the programme owing to their maturity and ability to deliver the benefits. There may be other countries where the need for such a programme is greater but where TI is either not represented or does not have sufficient capacity to carry out this programme.</li> <li>The programme has helped TI to improve their knowledge, experience and network within climate and forestry issues, which is applicable in future projects and in the broader national anti-corruption context.</li> <li>The extent of dialogue with REDD+ donors to address corruption issues as part of a forestry project could be increased.</li> </ul>
To what extent was the used approach suitable to addressing the REDD+ corruption risks in the target countries?	<ul> <li>There is universal agreement that the three main areas of the REDD+ integrity programme are entirely relevant in the countries concerned. Community outreach activities are critical. REDD+ implementation teams and other stakeholders, have not been successful in properly briefing communities on the programme, so the activities of TI are extremely important, in a much broader context that just corruption. To the extent that grievance mechanisms did not already exist in the countries concerned, these have been established and cases are being handled, and are on the increase. The extent to which chapters have been able to influence national policies is highly variable, but progress has been made in all countries.</li> <li>To the extent necessary, the country chapters have adapted their approach to fit the local context, for example placing priority on outreach activities to compensate the lack of dialogue with communities in general, adapting the ALAC process to meet the local culture etc.</li> </ul>



#### Consolidated response

**Impact:** The positive and negative changes produced by the programme, directly or indirectly. This involves the main outcomes and impacts resulting from the programme, both intended and unintended outcomes and impacts?

What have been the key outcomes achieved so far as a result of this programme and how does this compare with what was expected?	<ul> <li>The key outcomes of the programme have been:</li> <li>The production of a CRA around REDD+ for each country (except DRC and RC, which came into the programme at a later stage);</li> <li>The chapters successfully processed grievances raised by the public;</li> <li>The establishment of the REDD+ governance programmes and/or bodies in some countries;</li> <li>The strengthened reputation of TI, now viewed as leading organisation on corruption in land and environmental matters;</li> <li>The establishments of MSPs and/or focal points in relevant locations, who have the trust of local communities and who have supported TI in outreach activities;</li> <li>Actions taken as a result of reported grievances;</li> <li>Improved relationships with relevant public bodies in all the countries;</li> <li>Recognition of TI as a leading authority on climate integrity;</li> <li>Certain communities are able to understand and communicate the benefits of controlling deforestation and are, in some cases, demanding accountability and transparency.</li> <li>In terms of outcomes compared to expectations, the original proposal document included a number of quantitative targets – achievement of these targets is described in section 02 above.</li> </ul>
What changes has the programme achieved in terms of strengthening the implementing partners and civil society as leading actors in addressing REDD+ corruption issues?	<ul> <li>Implementation partners have, in all countries, been recognised for expertise in the area of corruption and climate finance.</li> <li>There have been various capacity-building seminars and trainings of public sector representations, national and local CSOs. Stakeholders expressed the view that prior to these sensitisation sessions, they had not made a connection between the topic of corruption and the REDD+ process.</li> <li>Outreach activities have strengthened the knowledge and capacity of communities and supporting stakeholders (e.g. councillors, chiefs, local representatives, MSPs etc) in all countries. Communities recognise the local implementation partners as a critical organisation in this respect.</li> </ul>



#### **Consolidated response**

**Effectiveness:** Assessment of how far the intended outcomes were achieved in relation to target set in the original programme proposal and in the national plans:

Have the interventions achieved or are they likely to achieve objectives (also looking into whether appropriate stakeholders have been included in the programme)?	The interventions have achieved the overall programme objective of " <b>improved anti-corruption policy and practice</b> <b>in REDD+ governance and financial integrity in Africa, through the development of effective strategies and</b> <b>policies which contribute to prevent corruption in REDD+ in Africa</b> ". The programme overall involved the engagement of a broad selection of stakeholders from the beginning with the development of a CRA. Outreach activities were designed with sustainability and partnerships in mind, and there was engagement with relevant public and civil society partners in all cases. The sustainability of these partnerships is better secured in some countries than others owing to the strengths and weaknesses of the related organisations.
How effective and appropriate was the programme approach?	The programme approach has been appropriate, taking into account the progress of REDD+ implementation in the countries concerned. It should be taken into account that the REDD+ process will continue for a number of years so a continuation of the REDD+ Governance and Finance Integrity for Africa programme is necessary (see later in this section on "sustainability" criteria).
What were the major factors influencing the achievement or non- achievement of the objectives?	<ul> <li>The effectiveness of various components of the programme varied from one country to another depending on:</li> <li>The extent and status of the REDD+ process ongoing in the country (including the supporting national strategies and associated policies, which are not always in line with the project timing e.g. Zimbabwe where projects are ongoing, but the national strategy has not been finalised). Being active at the beginning of the projects is important, but equally important is to maintain focus as projects are implemented.</li> <li>The political situation – ongoing elections in Ghana, for example, affected the sensitivity of politicians and ministries to messages about corruption.</li> <li>The nature of REDD+ implementation partners – some are more open than others to dialogue (e.g. in Zimbabwe, we were not able to meet with the main implementer who cancelled our meeting at short notice – TI-ZW does not have a good working relationship with them).</li> <li>The ability of key TI team members to develop the programme – it has been apparent that local chapters have developed strong capabilities in this area. Similarly TI-S have achieved recognition for their efforts.</li> <li>The strength of existing MSPs and relevant CSOs (in Zambia, there are few effective national MSPs in the forestry area).</li> </ul>



#### **Consolidated response**

**Effectiveness:** Assessment of how far the intended outcomes were achieved in relation to target set in the original programme proposal and in the national plans:

How effective was the	The cooperation with TI-S has been viewed in a very positive light by all of the chapters.
support of the TI Secretariat in terms of	The creation of a global platform for TI in terms of governance and climate finance has been highly appreciated.
enabling Chapters achieving the programme's	It would have been helpful for chapters to have more co-ordination between themselves and from other chapters engaging in similar activities, earlier in the programme.
goals?	The support of TI-S in securing additional funding for the programme going forward is critical to ensuring achievement of the objectives.
	TI-S has engaged with a number of international organisations during the programme. Some of this engagement has come somewhat later, for example, meeting donor organisations to address corruption matters during the establishment of REDD+ projects, and connecting with organisations working on parallel projects, such as FLEGT or other forestry initiatives.
Overall, what are the strengths and weaknesses of the programme?	The development of the CRA has helped to highlight the issue of corruption in the REDD+ processes and projects, and also to build a network of relevant stakeholders simply by virtue of the stakeholder engagement and clarification of the linkage of climate finance and corruption. The process of compiling the CRA has taken somewhat longer than expected such that other aspects of the programme were delayed.
	Outreach activities have been essential to bridge a knowledge gap for communities and local stakeholders (implementation partners, public sector representatives and CSOs). Engaged local communities have understood the consequences of deforestation for themselves and others.
	The provision of grievance mechanisms has been critical in some countries, where alternatives do not exist, to escalate corruption issues and, in some cases, to remedy complainants. The ALAC process has been adapted, where appropriate, to fit the local culture and situation. Some citizens are reluctant to report matters for fear of being identified, so are provided free legal counselling.
	The teams currently in place at TI-S and in the main four countries, are sufficiently skilled and experienced to carry out the programme. Not all of the chapters were properly equipped to run the programme from the beginning and had to seek appropriate resources to manage the programme.



#### **Consolidated response**

**Efficiency:** How far funding, personnel, regulatory, administrative, time, other resources and procedures contributed to or hindered the achievement of outputs.

How well did the partnership and management arrangements work and how did they develop over time?	The project partners have all been very satisfied with the partnership and management arrangements of the programme. In particular, the opportunity to engage with others outside their countries and share experiences has been critical. They have also appreciated the fact that the topic of REDD+ and corruption has been raised with regional and international organisations. This has helped them to create recognition in their own countries and enabled them to start or engage in relevant activities with relevant stakeholders (for example participation in anti-corruption task forces, contribute to relevant policies and processes etc). The monthly conference calls and annual, physical meetings have created a good opportunity for knowledge sharing between the chapters. However some of these initiatives were started rather late in the process.
How were implementing partners involved in programme management and how effective was this and what have been the benefits of or difficulties with this involvement?	The implementing partners have adapted the implementation of the programme, including the identification of which partners and stakeholders they would target in the process, to suit local situations. This adaptation has been done in dialogue with TI-S. This flexibility in the overall programme management has made implementation more effective.



#### Consolidated response

## **Efficiency:** How far funding, personnel, regulatory, administrative, time, other resources and procedures contributed to or hindered the achievement of outputs.

Were the risks properly identified and well managed?	The risks associated with the programme, have not been formally identified or managed. This has meant that activities have been somewhat reactive and adapted to local events.
Overall, did the programme represent good value for money?	The majority of funding has been spent on human resources. In the principle countries, at least one dedicated resource has been allocated to the programme almost from the outset. These individuals all had a background in climate finance and corruption and were well qualified to carry out the programme activities. Taking into account the types of activities, particularly in respect of community outreach, this seems like the minimum that would be required to achieve the objectives.
	At TI-S, there has been a full time programme officer and co-ordinator assigned. In respect of the activities of TI-S, the support provided to chapters has been critical, both in terms of templates and approaches and in establishing relationships with key global partners. In respect of influencing global policies TI-S have managed to engage with key global decision-making bodies including the UNFCCC, the UN-REDD programme, and the Forest Carbon Partnership Facility (FCPF). Representatives we interviewed found that the REDD+ Governance and Finance Integrity programme for Africa is filling an important gap in the current political discussions around REDD+. These activities require considerable time and effort on an ongoing basis to ensure timeliness and relevance since the overall REDD+ initiative is a dynamic programme.
	The other most significant costs concern publications and conferences (included in "other costs"). Publications have been important tools to inform a broad range of stakeholders on an ongoing basis. Conferences, including meetings between chapters from key countries, are an important mechanism to educate, share information and leverage ideas. A 7% indirect cost allocation has been added to the TI-S component in respect of administrative overheads.
	In terms of the cost effectiveness of the countries, the approach has been to select a manageable number of countries where the REDD+ programme could deliver significant benefits. DRC and RC were added at a late stage owing to a slow start in some of the key countries. Expenditure in these countries could still deliver significant benefits owing to the advanced status of REDD+ activity.



#### **Consolidated response**

#### Sustainability: Potential for the continuation of the impact achieved

To what extent are the TI implementing partners able to ensure the sustainability of programme outcomes through integrating aspects of the work in their future work, e.g. advocacy strategies/project design?	In general, whilst the programme has increased the level of understanding and activities in relation to governance and financial integrity, all of the stakeholders voiced the view that ongoing involvement of TI was necessary to ensure ongoing sustainability of anti-corruption efforts as the level of REDD+ activities increases in the countries. The ALAC will continue to operate for all activities dealing with grievances in relation to corruption. In those countries where an alternative, less formal system has been operating (e.g. Zimbabwe) to fit the local culture, this will not continue without the involvement of TI. Similarly, participation of TI-C in the collaborative SNOIE in Cameroon will be dependent on continued funding. In respect of influencing policy, in particular the safeguards and monitoring around REDD+ none of the countries are currently operational, so the ongoing involvement of TI is somewhat critical.
What are the major factors, which	The existence of the country risk assessments (CRAs) plays an important role in securing the sustainability of the programme in that it is an important public reference document other stakeholders can refer to.
influenced the achievement or non- achievement of	The ability of other stakeholders to obtain their own funding is also critical (e.g. in Cameroon, FODER who operate the collaborative SNOEI grievance mechanism, will need additional funding in the near future, various public organisation representatives active in communities cited a lack of funding etc.).
sustainability of the programme?	In some countries, training efforts have included stakeholders whom are likely to be relatively permanent, lending some degree of stability to efforts (e.g. Parliamentary clerk in Zimbabwe, who helped to collect parliamentarians in training, councillors and chiefs in countries where they are relevant etc).
	The status of the national REDD+ strategy and associated legislation in the countries varies and is developing in different directions and at different paces. In those countries where national strategies and legislations are still under development, the sustainability of efforts undertaking during the programme so far, is less.



Evaluation question	Consolidated response
Sustainability: Potentia	al for the continuation of the impact achieved
What are the mechanisms in place (or planned) to ensure that achieved results are maintained and built upon by the implementing partners, governments and / or other relevant stakeholders?	There are some measures in place to ensure that results are built upon by implementing partners, governments or other stakeholders, which are noted above. These include education of public sector workers, politicians, officials, citizens etc, publishing of papers, the establishment of anti-corruption task forces, and partnerships with civil society organisations who have been educated and trained during the programme, and thus are capable of continuing the work and advocacy for promoting integrity as part of the REDD+.

# 05

### **Lessons learned**

#### **Lessons learned**

On the following pages, we have set out the lessons learned for each of the countries involved in the programme. These comprise both aspects of the programme that have challenged TI and case studies that demonstrate creative and effective initiatives in each country. These are examples which can be shared with other project teams running similar programmes.

In addition to these individual cases, we have set out here adjacent, some of the general lessons learned which can help other project teams. These arise from both positive aspects identified during the evaluation, and some areas where stakeholders or TI themselves noted points for improvement.

#### **General points**

- Having a well-respected, knowledgeable and skilled team to carry out programmes is essential for the success of the programmes. In particular having interpersonal qualities that can help establish relationships with a broad range of stakeholders including public sector, communities, other CSOs and the private sector.
- Managing the risks of the programme and responding to changing circumstances on a timely basis to ensure all elements of the programme are relevant is essential.



#### Lessons learned: Cameroon

#### **Community engagement**

TI-C have spent a lot of time and effort travelling to communities. Considerable programme resources have been spent developing the capacity of CSOs and communities to engage in the REDD+ process. The increase in cases reported through the SNOIE is an indication that these efforts have been effective, however the true impact of the activities behind result 1 will not show before the REDD+ process moves into its second phase at a national level.

It might have been advisable to evaluate the focus and resources allocated to the three focus area of the integrity programme in light of the delayed national REDD+ process.

#### **Engagement with government**

TI-C is an active member of a governmental oversight committee focusing on governance of the REDD+ process and projects. They have achieved this position by establishing good relationships with relevant individuals. They have contributed to the development of national REDD+ safeguards and monitoring.

#### Using an ISO standard for grievance reporting

A positive example from TI-C is their partnership with the CSO FODER on the Standardised External Independent Monitoring System (SNOIE). The SNOIE is ISO standardised through the ISO 9001 (version 2008, but currently being upgraded to the 2012 version), and has been a great success in solving disputes over forest- and resource management. Since August 2016, the SNOIE has processed 14 cases. 11 of these have elicited positive responses and involvement of the authorities (the remaining three are relatively new).

The ISO standardised system has been very useful in terms of getting both the public and not least the political system involved in a standardised and transparent process, and has made it easy for all partners involved to understand their role, and what is expected of them. The certification lends a degree of authority to the overall process.

#### The process of the SNOIE

- 1. Observation is made in community
- 2. One of the local CSOs working with the SNOIE, verifies the complaint in the field and files a report, which is sent to FODER
- 3. FODER quality assures the report in cooperation with the CSO
- 4. FODER sends the report to ETC committee (6 experts) and TI-C initiate lobby work (centrally and locally)
- 5. The IFM report is then sent to the responsible local authority, as well as relevant national level
- 6. The local CSO/FODER go on joint mission with local authority to verify the grievance
- 7. If the complaint is found to be relevant, the local authority takes appropriate actions

#### Lessons learned: Ghana

#### Teach the teacher

In one specific community, a dedicated teacher was briefed about deforestation, REDD+ and the risk of corruption in the process by GII as part of their outreach activities. The individual took this knowledge back with him to the small community of Asomdwee, where the forest has a significant impact on the well-being of the local people.

The teacher has now initiated a youth wildlife club, where the students are taught about the importance of the forest and wildlife surrounding them. The children have a sound understanding of why the forest is important to them and the type of issues that arise when deforestation occurs. They are also engaged in getting their parents and family to understand the issues surrounding deforestation. As a result, the community have stopped the practise of burning down the forest for clearing farmland, and a small forest has been established behind the school.

#### ALAC steering committee

GII have established a steering committee to consider and take action in respect of grievances. The ALAC cases relating to REDD+ are all discussed by the steering committee who can then ensure efficient and effective

actions by virtue of their positions.

#### **Relationship with public sector**

The political climate is difficult in Ghana largely in connection with the internal relationships around forestry management in the past. Engagement of a former FC employee to work on this programme at GII has enabled significant progress in developing collaboration in respect of REDD+ projects.





#### Lessons learned: Zambia



#### **Community Notice Boards**

TI-Z have developed the concept of "Community Notice Boards" assuming the role of a focal point. This contributes to the sustainability of outreach activities, since the CNBs act as coordinators and educators, depending on their level of expertise. These individuals lend some degree of sustainability for TI in terms of ensuring education and assistance is provided to relevant remote communities impacted by deforestation.

#### **National steering committees**

TI-Z have been consulted in the development of the national REDD+ strategy and are now invited to participate in steering groups looking into national REDD+ safeguards and monitoring. They have been invited as a result of their involvement in developing the national REDD+ strategy, where the general perception by the public institutions, who now sees the TI chapter as a CSO with strong expertise within the field of environmental issues.

#### **Competent MSPs**

In Zambia there is a shortage of competent CSOs or associated platforms to facilitate TI-Z's role or enhance the sustainability of the programme. If TI-Z were able to create a platform to encourage CSOs in this domain early in the programme, there might have been more opportunities to forge partnerships which in turn would increase the sustainability of the TI programme.



#### Lessons learned: Zimbabwe



#### **Community engagement**

TI-ZW have focused outreach activities on a small number of communities. Not being allowed to intervene in the other regions where REDD+ projects are ongoing, has meant they have focused on the Mbire district.

Outreach activities have included legal support workshops where grievances can be aired, because it was clear that communities were not comfortable with reporting matters using the formal ALAC process. When conducting workshops on the REDD+ programme in the local communities, an ALAC representative from TI-ZW was present so the people could engage with legal expertise in a discrete manner. This has enabled relevant remediating actions to be taken in view of grievances to the benefit of the community and REDD+ programme overall.

#### **Training parliamentarians**

TI-ZW have targeted parliamentarians to help raise the importance of governance as part of the REDD+ programme. This has provided the parliamentarians the necessary knowledge and expertise to effectively pressurise ministries to work on issues related to REDD+ and integrity at national level because of their increased knowledge on REDD+ and the impact of corruption. The impact has not been fully realised yet, but there are an increasing number of parliamentarians able to effectively challenge national REDD+ projects and associated safeguards and monitoring.



### Lessons learned: DRC and RC

#### **Engagement with the media**

In RC, the media were well positioned and ready to co-operate in respect of anti-corruption efforts. Investigations into reported cases have been supported by the media which is an effective way to ensure sustainability of the programme.

Both Licoco and RDPH have been effective in using radio broadcasts to assist in outreach activities and educating relevant communities.

#### **Developing anti-corruption organisations**

The programme has enabled TI to develop potential affilicated organisations in the countries of DRC and RC. Taking into account the political instability and extent of corruption, this is a significant step for the TI organisation.

Furthermore, taking into account the extent of REDD+ activity in those countries, the opportunity to address related corruption is rather important.





# 06

## Recommendations

#### **Recommendations**

Introduction

Set out below is a table identifying our observations, our suggested actions and a rating.

The ratings indicate:



The observations include:

- Matters raised by interviewees in this context we have only included observations which have been corroborated, either by other interviewees or by ourselves;
- Observations we have made based on previous experience and information provided to us during the course of the assignment;

#### **Recommendations – global and regional**

Observation	Action	Rating
At the beginning of the programme, there was limited information sharing between chapters. There also appears to be a lack of knowledge in the chapters on what others are doing. However some initiatives are being shared and explored across boarders – including the ISO certified complaint mechanism developed in Cameroon.	More frequent information sharing between TI chapters and dissemination of this information to relevant stakeholders	•
Community members have no reference point for determining the fairness and governance structure of REDD+ programmes.	Consider the role TI could play in sharing information which will help civil society interpret REDD+ initiatives. This will be crucial going forward when governments start to implement REDD+ projects, particularly when this is outside of where the TI chapters have focused their actions and outreach activities.	•
TI-S have engaged in multiple international fora and conferences, presenting the REDD+ governance and financial integrity programme and raising awareness. The focus of engagement is dynamic and dependent on the status of REDD+ initiatives and activities of other interested organisations.	Formalise an ongoing assessment of relevant stakeholders and programmes to determine the most effective use of time for TI-S and Eu activities.	•

### **Recommendations – global and regional**

Observation	Action	Rating
TI have established multiple formal and informal partnerships with international donors, institutions and CSOs.	TI-S should critically analyse which partnerships they should continue with in respect of available resources at TI.	٠
TI have been very successful in reaching civil society and decision-makers with their main messages and claims via their website and Facebook page (i.e. during COP21 alone these number was 600,000 and 22,250 respectively).	Develop a social media plan on how to continue to engage relevant stakeholder in the discussions around REDD+ and integrity issues.	
The programme is monitored closely by TI-S on monthly calls with the country teams, but there is no formal programme risk management.	Develop an appropriate programme risk management approach that can be used by both TI-S and countries to anticipate and manage the risks of all programmes.	•
Anti-corruption is not effectively integrated into donor REDD+ programmes.	Consider initiatives at the level of principal REDD+ donors to improve the integration of effective safeguards and monitoring.	

#### **Recommendations - Cameroon**

Observation	Action	Rating
TI-C has engaged with CSOs, and particularly local focal points in relevant regions. There has been no engagement with private sector stakeholders.	TI-C should develop an engagement strategy, particularly in terms of outreach activities with CSOs and the private sector to ensure longer term sustainability.	٠
Recently, a task force has been established to oversee governance and financial integrity in the national REDD+ process in Cameroon, as a result of TI'Cs engagement and advocacy efforts.	TI-C should focus efforts in the short-term on engaging with the governance task force to maximise leverage over national safeguards and monitoring.	•
The organisation behind the SNOIE, FODER, may have to seek alternative sources of funding after next year.	Given the successful collaboration to set up and operate the SNOIE, TI-C should consider collaborating with FODER to seek additional funding together.	•
TI-C has built strong relationships with relevant public sector stakeholders. There were indications during stakeholder engagement that this might influence the extent to which feedback to those public sector organisations, would be sufficiently critical.	TI-C should continue to build on the strong public sector relationships whilst maintaining independence in terms of critical feedback.	

#### **Recommendations - Ghana**

Observation	Action	Rating
GII have had difficulties in getting traction with government, largely owing to historical internal issues and the discomfort with the topic of corruption.	GII should develop relationships with the government and the forestry commission by using a different approach – selling the topic of "governance" rather than using an anti- corruption approach. This should include a mapping of where they can work together in partnerships – e.g. pilot projects, independent monitoring etc. The publication of policy papers should also be considered.	
GII has addressed the challenge of engaging with communities across a number of regions where REDD+ activity is ongoing. Maintaining this level of engagement will be a challenge going forward.	Use the hot spot intervention areas (REDD+ areas prioritised by the government) to prioritise outreach activities in communities.	•
GII have provided verbal input regarding governance matters to the KASA initiative. This input has been valued by relevant stakeholders, but is difficult for them to leverage.	Ensure that any positions or input is provided in writing.	•
There are some critical events ongoing in respect of the national REDD+ activities which GII should consider contributing to.	Establish a position to advise on safeguards and monitoring on pilot projects – given the current state of relationships with public authorities, consider the extent to which KASA Initiative and IUCN can assist.	•

#### **Recommendations - Ghana**

Observation	Action	Rating
GII has engaged with CSOs and established MSPs in relevant regions. There has been limited engagement with private sector stakeholders.	GII should develop an engagement strategy, particularly in terms of outreach activities with the MSPs and the private sector to ensure longer term sustainability.	•
GII have engaged with the MSP established by KASA Initiative and also with IUCN. These organisations are well respected by public authorities.	Consider formalising partnership agreements to leverage KASA Initiative and IUCN as platforms for establishing better relationships to the public sector.	•
GII has provided training to a number of stakeholders. Some traction at public sector level is still missing.	Training parliamentarians could be a way to influence policy.	•

#### **Recommendations - Zambia**

Observation	Action	Rating
One case involving the alleged burning of villages by BCP has not been resolved. The government has not investigated and there is deadlock between BCP and TI.	When there is a case, it is important to see the physical evidence as soon after the case is reported.	•
In Zambia it is difficult for TI-Z to establish strong CSO networks because there are no obvious platforms that exist for them to leverage.	Investigate the new environmental hub that has been developed recently.	•
The Ministry of Land, Natural Resources and Environmental protection have formally requested TI-Z to participate in the technical steering committee looking into REDD+ safeguards and monitoring.	TI-Z should continuing engaging with the steering committees to ensure the inclusion of appropriate measures and to oversee implementation.	•
The relationship between TI-Z and BCP has improved over time but requires ongoing engagement.	Consider a formal partnership agreement with BCP to establish better leverage and an improved relationship.	•
The Interim Climate Change Secretariat (ICCS) has not been involved in the REDD+ process recently but has a good oversight.	Re-engage with the ICCS to leverage knowledge and connections.	•

#### **Recommendations - Zambia**

Observation	Action	Rating
TI-Z do not currently engage with the private sector players (other than the implementers) engaged in activities that would impact REDD+.	Discuss potential business integrity activities that could add value in the REDD+ Governance and Financial Integrity for Africa programme.	•
Government ministries have integrity committees. Generally, these committees do not have a significant impact and are not well respected. They could have the potential to influence policies in a positive manner.	Continue to lobby for TI involvement in integrity committees.	•



#### **Recommendations - Zimbabwe**

Observation	Action	Rating
The sustainability of outreach activities presents a significant practical problem. These activities are time consuming and resource intensive. There is also the complexity of interacting with other CSOs, where relationships are still under development, and CGA, where the relationship is poor.	Discuss with the communities the possibility of identifying a point person to collect information on REDD+ and relevant information to act as a liaison between the communities and organisations such as TI-ZW.	•
The relationship between TI-ZW and the implementer, CGA, is weak. CGA is not engaging with the communities in an effective manner.	Consider alternatives for improvement of the working relationship with CGA.	•
The national REDD+ strategy is not yet finalised, together with safeguards and monitoring.	For maximum impact focus on the development of safeguards and monitoring as the national REDD+ strategy is developed.	•
An education programme for Parliamentarians around governance in the REDD process has been effective, but these individuals are numerous and subject to frequent rotation.	Provide ongoing support to the Parliamentary clerk(s) to ensure the sustainability of efforts.	•
TI-ZW came to the table somewhat late in terms of providing input to the Kariba REDD+ project, however TI-ZW is moving along with the steps taken by the government in the REDD+ process.	Continue to engage with government in the process, and make sure to ensure timely, written input to relevant materials (eg safeguards and monitoring).	

#### **Recommendations – DRC**

Observation	Action	Rating
There are a large number of CSOs acting in DRC in respect of REDD+ projects. Co-ordination between these CSOs is poor.	Consider the role that LICOCO could play in establishing MSPs in the region in a manner that is effective in leveraging the strengths of the CSO organisations in the area of land and corruption issues.	•
Grievance mechanisms for victims and witnesses of corruption are being established in co- operation with partner organisations.	Consider leveraging how grievances are dealt with in Cameroon as a model for the mechanism in terms of the division of duties between who handles the administrative tasks of the tool versus the advocacy of the complaints.	
The corruption risk-assessments have functioned as valuable engagement tools in the other programme countries.	LICOCO should consider developing their own risk assessment, with help and input from TI.	•

#### **Recommendations – RC**

Observation	Action	Rating
RDPH have already expanded their networks as a result of being involved in this TI programme.	Develop networks with relevant stakeholders in RC further to enhance the effectiveness, efficiency and sustainability of the programme.	•
Grievance mechanisms for victims and witnesses of corruption are being established in co- operation with partner organisations.	Consider leveraging how grievances are dealt with in Cameroon as a model for the mechanism in terms of the division of duties between who handles the administrative tasks of the tool versus the advocacy of the complaints.	•
RPDH played an important role in pushing through the mandatory reporting of forestry revenues in the Extractive Industries Transparency Initiative (EITI).	RPDH should follow-up on these reports when they are published, and consider how this could be implemented in the national REDD+ monitoring system.	•
The corruption risk-assessments have functioned as valuable engagement tools in the other programme countries.	RPDH should consider developing their own risk assessment, with help and input from TI.	•



**VALUE FOR GENERATIONS** 

Gårdhuset, Hellerupvej 8 2900 Hellerup Denmark Contact: Partner Judith Canning Email: jc@sdglead.com Mobile: +45 2199 6492