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Illegal Timber Trade and REDD+ Interface in Eastern Africa: A Pilot

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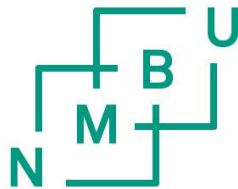
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EXECUTIVE SUMMARY

NORAD has requested a desk appraisal of the following programme proposal: “Illegal Timber Trade and REDD+ Interface in Eastern Africa: A pilot” (hereafter ‘ITT-REDD’). The programme’s objective is to enhance national and regional capacity to combat the illegal timber and charcoal trade in East Africa.

Terms of Reference for the appraisal, including a general document format, are enclosed in Annex 1. The report follows guidelines for appraisals given by Norad’s *Development Cooperation Manual*, which includes an analysis of relevance, planning processes, institutional and organisational design, project activities, and budget allocations, as well as cost-effectiveness and efficiency. We also look at funding modalities, governance, information management, the programme’s results framework, donor coordination and risks, as well as long-term sustainability issues. Key findings of the appraisal are identified and summarized below:

Relevance

1. The joint programme document (PD) articulates multiple intentions and ambitions: enhancing partner capacity to sustainably govern forests and biodiversity; proactively and reactively combating the illegal timber and charcoal trade; and addressing the underlying drivers of deforestation and degradation in East Africa. Accordingly, the programme is highly relevant for broader efforts to sustainably govern a global REDD mechanism. It also seeks to innovatively address these issues across five multilateral agencies and three partner countries. As such, the programme constitutes a novel pilot and demonstration initiative of far more than regional and national interest. In this sense, the ITT-REDD programme retains the potential to serve as a ‘lighthouse’ for similar undertakings in other regions in the developing world.
2. The programme is clearly relevant for both regional (EAC), national (Kenya, Tanzania and Uganda), and local level actors. Substantial support for the programme’s rationale can be found in policy documents from each of the partner countries, as well as from relevant multilateral organizations.
3. The programme is thus both clearly relevant and suitable for Norwegian support, and synergizes well with the objectives of Norway’s International Climate and Forestry Initiative (NICFI).
4. The overall programme concept is sound, given that it seeks to innovatively combine knowledge production and awareness-raising of the illegal timber trade with (re)forming legal frameworks and improving law enforcement activities under a joint regional and multilateral umbrella.

However, we have identified a number of issues related to the programme’s relevance that may jeopardize its ability to deliver on these ambitions.

5. First, the programme needs a clearer national level anchoring, which should be expressed in the PD. National partners should be involved in the revamp of the PD's goals, outcomes, measures, and instruments and properly included in the management structure of the project. In particular, relevant natural resource management agencies should be more formally involved, including Tanzania National parks (TANAPA), Tanzania Forest Service (TFS), the Forestry and Beekeeping Division, Ministry of Natural Resources and Tourism (Tanzania), Uganda Wildlife Authority (UWA), national Forest Authority (NFA), Kenya Forest Service (KFS) and Kenya Wildlife Service (KWS), as well as similar institutions in law enforcement, finance and the judiciary. Concerns related to corruption in these agencies must be confronted rather than avoided, and should not trump an eventual shift to national and regional (ie. EAC) ownership of the programme.

6. The programme should consider a narrowing of its focus to primarily deal with the illegal timber trade and related issues of forest degradation. The charcoal production and trade likely requires a significantly different set of goals, measures, and instruments, which are not adequately articulated by the existing PD. This recommendation may have particular implications for the REDD+ part of the project, which is more clearly linked to deforestation as a result of charcoaling activities. The alternative would be to develop and integrate a clearer charcoal-specific component into the PD, along with a risk assessment of how this may affect the livelihoods of vulnerable groups such as forest-dwelling indigenous communities.

7. The project document should clarify its choice of geographical focus. It should either expand its geographical focus to include DRC and other relevant sources of illegal timber, or alternatively narrow its focus to Kenya and Tanzania as exit points for such timber to international markets. As made clear in this report, a significant portion of illegal timber in East Africa is sourced from DRC, and only an estimated 5 percent of this is exported beyond the region (Forests Monitor 2007; Chevallier and du Preez 2012; WWF 2012). Omitting this dimension of the East African trade in illegal timber does not align with the programme's expressed intention to address the root causes of this trade in the region.

Programme structure and design

8. The PD's planning process and inclusion of actors is only vaguely presented in the PD, leaving uncertainty around the role and involvement of national-level governments, and regional organizations, such as the EAC. The PD should have included an overview of relevant national partners and stakeholders to be involved in the programme.

9. The PD requires a clearer theory of change and results framework than what has been presented. There are several important inconsistencies between goals, objectives, outputs and inputs. Some examples include i) whether the suggested measure of container profiling and checking sufficiently addresses the underlying drivers of illegal timber trade; ii) why and how the identified partner countries have been selected, while other major sources of illegal timber (such as DRC) have been excluded; iii) what the specific demonstration qualities are that the programme intends to produce; and iv)

whether the illegal timber trade and illegal charcoal trade can be effectively addressed with a similar suite of actors, mechanisms, institutions, and procedures. Furthermore, there is no analysis that presents the reason for how the illegal trade is allowed to happen. Based on this, what (capacity) gaps are the project then trying to fill?

10. The PD needs a clearer organogramme for the project. Resources, rights and responsibilities should be made explicit. One should rethink the programme's organisational structure in relation to its role as a pilot scheme with demonstration properties for future work in the field. The organisational structure and related activities should also be streamlined and made more cost-efficient.

11. Monitoring and evaluation indicators should address programme outcomes, outputs and project level activities. Further, if both the charcoal and timber trade(s) are included, indicators must be provided for both sets of processes.

12. The budget is developed according to UNDG Joint Programming format. The budget overview presented in the PD provides, however, too little information for the Team to make a qualified assessment of the budget size, components and unit costs. The Team understands that the programme planning is still in an early phase, but at least a work plan, including details on essential inputs, equipment, and their related costs could be expected for the inception phase at this stage in the planning. It does also seem as if administration and overheads consume an excessively high proportion of the total allocation. The container profiling costs also excessive, and do not resonate well with a demonstration activity to be replicated elsewhere, preferably without donor support.

13. There seems to be a need to clarify the added value of ITT-REDD in relation to other activities funded by Norway, such as Norway's support for ORGFORC and Project LEAF.

Sustainability and risks

14. There seems to be a lack of involvement and support from national agencies and institutions, not only in the planning process but also in the PD design and structure, which threatens programme and project sustainability. Programme activities should be integrated in national plans, expressed needs, and ambitions. There should be a programme plan for when and where national and regional authorities replace UN bodies as implementing authorities of a future incarnation of the programme. This should be clearly specified and addressed in the PD.

15. The potential added value of a joint regional programme versus individual project components should be spelt out as part of the pilot scheme's properties, which will assist in ensuring the long-term sustainability of the programme's outcomes.

16. Anti-corruption measures are insufficiently addressed in the current PD, especially in relation to corruption involving law enforcement or natural resource management officials. 'Lessons learned' from recent cases of high-level corruption in natural resource management in the identified partner countries

have not been extracted or otherwise identified. Such lessons should be referenced in a revised version of the PD.

17. Proposed implementation and pilot activities seem overly costly and little has been done to suggest measures of cost-saving by including other actors or through cost recovery activities.
18. Potential impacts on vulnerable groups have not been identified. Here, risks include possible restrictions on resource access for forest-dwelling indigenous people, such as the Batwa, Ogiek, or Sengwer. If unchecked, this may constitute a major challenge for programme sustainability and legitimacy.
19. Environmental sustainability is a challenge for the programme; not least if charcoal activities are to be addressed. Banning and controlling illegal timber trade may be more possible to contain.
20. The time frame of the programme (2 years) is too short relative to ambitions and suggested outcomes and there seems to be some underlying ambitions of several phases of the programme. If so, these should be more clearly spelt out in the PD.

Conclusion and overall recommendation

21. In general, we recommend a major revision of the PD. This must include a serious involvement of relevant state agencies and regional bodies (e.g. the EAC), a reflection around concentrating on the illegal timber trade versus the illegal trade in charcoal, and a stronger justification of the selected partner countries in relation to the empirical characteristics of supply chains for illegal timber in East Africa and the Upper Great Lakes Region. Further, the authors of the PD must articulate a sound and coherent theory of change that links relevant activities to outcomes in the programme's results framework. Finally, a general improvement in the quality of the PD is required; specifically in relation to the robustness of its conceptual framework; its design and planning process; its organisational and economic structure; and its assessment of sustainability and risk factors.
22. We believe that a major revamp must be conducted before full-scale funding is considered. Possible options for support could involve seed funding, establishment of a MoU, or similar mechanisms. In the latter case, however, one should consider challenges related to establishing strong national links in three partner countries without a clear funding timeline.¹

¹ Interview with UNODC, 04.06.2014.

1. INTRODUCTION

NORAD has requested a desk appraisal of the following programme proposal: “Illegal Timber Trade and REDD+ interface in Eastern Africa: A pilot” (hereafter ‘ITT-REDD’). The programme’s objective is to enhance national and regional capacity to combat the illegal timber and charcoal trade in East Africa.

The joint programme document (PD) has been prepared by INTERPOL, and some UN agencies: UNODC, UN-REDD, FAO, UNEP, and UNDP. Terms of Reference for the appraisal, including a general document format, are enclosed in Annex 1.

The programme expects to be implemented in cooperation with the partner countries of Uganda, Kenya, and Tanzania. The illegal timber trade is an important feature of organized crime in these three countries, given that each serves – though to varying degrees – as source, transit and exit points for the illegal trade in forest products (see Milledge et al. 2007; Chevallier and du Preez 2012; WWF 2012).

The four expected results of the programme are as follows:

1. Awareness and knowledge raised among stakeholders on the magnitude of, and options to address, illegal timber trade in East Africa
2. Enhanced national law enforcement, judiciary and prosecution capacities to combat illegal timber trade combined with establishment and support to the implementation of container profiling units for timber in East Africa
3. Key areas to strengthen the institutional & regulatory framework for sustainable timber production & trade are identified
4. The regional initiative on illegal timber trade is well managed, serves to raise the issue politically among national governments and sets a model to replicate in other regions

The appraisal team included the following members:

- Paul Vedeld, (team leader) Professor, Department for Environment and Development Studies (Noragric), Norwegian University of Life Sciences (NMBU), Ås, Norway
- Leif Tore Trædal; previously Norad Senior Adviser, now PhD Research Fellow, Noragric, NMBU
- Connor Joseph Cavanagh, PhD Research Fellow, Noragric, NMBU

The desk appraisal has been facilitated by Tore Langhelle (NORAD) and Morten Nordskog (KLD). We also thank other involved parties at NORAD and KLD for their important inputs to the process.

The report follows the TOR (Appendix 1) and the guidelines for appraisals given by Norad’s *Development Cooperation Manual*, including an analysis of relevance, planning processes, institutional and organisational design, project activities, budget allocations and cost-effectiveness and efficiency. We also look at funding modalities, governance,

information management, the programme's results framework, donor coordination and risks, as well as long term sustainability issues. Based on this appraisal, we have made a number of recommendations that are enclosed in the report's executive summary.

This appraisal is a desk study; consequently, it is limited by its lack of first-hand experiences and informal talks with involved agencies. However, we have conducted a series of interviews with key individuals over Skype and telephone, which has allowed us to gain insight into associated planning processes, deliberations related to the programme design, and sustainability considerations in accordance with the TOR. We have also asked key institutions to respond to some questions that arose in the process of conducting the appraisal (see Appendix 5).

Another feature of the proposed programme is the involvement of five different implementing agencies, with an ambition to create a consistent and coherent set of policies and practices in three different countries. These programme characteristics have made our appraisal somewhat challenging, as its success or failure will ultimately depend upon the ability of these agencies to effectively coordinate their activities 'on the ground'. As a result, many of our inputs must be seen more as interpretive suggestions rather than firm 'commandments', given that their feasibility will depend to a large degree on the capacities and competencies of the involved agencies and personnel.

2. PROGRAMME RATIONALE, SCOPE, AND RELEVANCE

This section appraises the scope and relevance of the ITT-REDD programme document in comparison and contrast to expressed partner needs, relevant legal and policy frameworks, and the literature on the illegal trade in forest products in East Africa and the Upper Great Lakes Region.

2.1 PROGRAMME RATIONALE

The proposed ITT-REDD programme seeks to enhance national and regional capacity to combat the illegal trade in forest products in East Africa. This objective is important, as the illegal trade in timber and charcoal threatens to undermine both economic growth derived from legitimate commerce in forest products and emerging attempts to mitigate climate change with REDD+ schemes (Milledge et al. 2007; Chevallier and du Preez 2012; EAWLS/TNRF 2012; WWF 2012).

ITT-REDD aims to achieve this objective with a combination of both proactive and reactive measures. Examples of proactive measures include capacity building and awareness-raising, whereas reactive measures include law enforcement, investigative and prosecution activities such as container profiling.

Acknowledging the cross-jurisdictional nature of the illegal timber trade, the programme focuses on three countries that serve as source, transit, and/or exit points for illegal resources: Kenya, Tanzania, and Uganda. Implementation is expected to take place at the national level, using relevant sections of the East African Community (EAC) customs declaration on Prohibited and Restricted Goods as a common point of reference.

2.2 HARMONIZATION WITH EXISTING LEGISLATION AND POLICY FRAMEWORKS

Although this focus on EAC customs regulations is a useful starting point, we note that the PD does not make reference to other relevant legislation designed to combat the global trade in illegal timber. For the purposes of ITT-REDD, the three most relevant pieces of legislation are the 2008 US Lacey Act Amendment, EU Timber Regulation (EUTR) 995/2010, and the Australian 2012 Illegal Logging Prohibition Act. These three pieces of legislation currently lead global demand-side efforts to combat the illegal timber trade, and it would be advantageous for the ITT-REDD programme to reflect an understanding of relevant compliance processes, especially given that the US, EU, and Australia constitute a significant portion of demand for official exports of forest products from East Africa (Milledge et al., 2007).

In the US, the Lacey Act was originally introduced in 1900 to combat the trade in illegal fish and wildlife. In 2008, however, the Act was extended to also include foreign species of timber and other forest products. As a result, US companies are now required to declare the country of harvest for imported timber and forest products, as well as its value and quantity, and to conduct due diligence to ensure that supply chains do not contain illegal products.

EUTR 995/2010 came into force on 03 March 2013, and is the first piece of European legislation to specifically prohibit EU companies from importing illegal timber. The EUTR also requires firms to conduct due diligence on their supply chains and maintain records of all relevant audits. These compliance procedures are further coupled with the Voluntary Partnership Agreements (VPAs) negotiated with partner countries under the auspices of the Forest Law Enforcement, Governance, and Trade (FLEGT) mechanism, which is mentioned in the PD. For the purposes of the ITT-REDD programme, however, VPAs have yet to be officially negotiated for Uganda, Kenya, or Tanzania; in the broader region, the Democratic Republic of Congo (DRC) is the only country currently undergoing formal FLEGT VPA negotiations. The draft PD does not specify precisely how ITT-REDD might serve as an initial basis for negotiating FLEGT VPAs in the selected partner countries.

Likewise, the 2012 Australian Illegal Logging Prohibition Act – which will come into effect on 30 November 2014 – prohibits both the import of illegal timber and the processing of illegal logs. Similar to the above two pieces of legislation, the Act also requires Australian companies to conduct due diligence to verify their supply chains as being free of such products.

The ITT-REDD programme should be familiar with relevant legislation in these jurisdictions, so as to reduce the transaction costs entailed by compliance and assist East African producers of forest products to conduct their business in a lawful manner. Indeed, if timber producers perceive compliance as being too costly or onerous, such legislation may actually provide incentives for participation in illegal markets, and inadvertently lend market advantage to countries without such legislation (such as China or the Gulf states). The ITT-REDD programme should work to avoid both of these outcomes.

2.3 GEOGRAPHIC SCOPE AND RELEVANCE: EAST AFRICA OR UPPER GREAT LAKES REGION?

The partner countries of Uganda, Kenya, and Tanzania have been chosen for three primary reasons. First, each is a UN-REDD member country (although only Tanzania currently receives financial support as a UN REDD National Programme country), in which the illegal trade in timber and charcoal has reportedly been recognized as a driver of deforestation and forest degradation.² Second, the three countries are connected to each other by the nature of the East African illegal timber trade itself, which relies on Kenyan and Tanzanian ports to access international markets. Third, each country has reportedly expressed an intention to control the illegal trade in forest products, and is bound by a common set of commitments under EAC customs regulations.³

At first glance, both the programme rationale and its corresponding geographic scope appear to be sound. The PD references a 2007 report from TRAFFIC (Milledge et al. 2007: 3), which makes the much-cited allegation that “China imported ten times more timber products from Tanzania than appear on Tanzania’s own export records”⁴, insinuating that the illegal trade in timber is both rampant and largely unrecorded in East Africa. The PD also references Catherine MacKenzie’s (2006) report on illegal timber as ‘Chinese takeaway’ from Mozambique, although the exact connection it seeks to make with the East African context is unclear, given that MacKenzie does not link these processes to Tanzanian or Kenyan ports. More recently, though, similar issues have also been examined in a FLEGT publication on the trade in forest products between Kenya and Tanzania (EAWLS/TNRF 2012), which likewise uncovered a variety of issues related to corruption, informality, and endemic illegality in the trade between the two countries.

² We note, however, that the PD does not provide references or evidence to substantiate this assertion (see ITT-REDD programme document, p. 9).

³ The expressed intentions of the partner countries to address the illegal timber trade are also unreferenced and unsubstantiated by the PD, although it is of course intuitive that each country formally subscribes to EAC customs regulations, as well as to their related commitments as UN REDD member countries.

⁴ However, since the TRAFFIC report provides limited information on its methodology and data sources, it is difficult to verify whether this figure refers to exports of timber *from Tanzania*, or simply to exports of timber *via* the port at Dar es Salaam that originate elsewhere in the region.

Yet, a closer reading of the extant literature on the illegal timber trade in East Africa and the Upper Great Lakes Region further highlights a number of issues that do not appear to be sufficiently addressed by the PD.

First, the existing literature suggests that the majority of illegal timber in East Africa originates in the eastern Democratic Republic of Congo (DRC) rather than in the chosen partner countries of Uganda, Kenya, or Tanzania (Forests Monitor 2007; Chevallier and du Preez 2012; WWF 2012; Lawson 2014).⁵ Illegal logging in DRC also occurs on a scale that is largely infeasible in the comparatively timber-scarce countries of the EAC; for example, a recent Chatham House report (Lawson 2014) estimates that 90 percent of logging in the DRC is illegal or informal, and that the volume of illegal timber produced has doubled in the last six years. Similar observations are made in a Norwegian MFA-funded report from the South African Institute of International Affairs (Chevallier and du Preez 2012: 8), which contends that “the bulk of tropical timber on East African markets is from the eastern DRC”, with at least 80 percent transiting through Uganda.

Second, the literature suggests that most of the illegal timber produced in the region is consumed on East African rather than international markets (Forests Monitor 2007; Chevallier and du Preez 2012, WWF 2012). As a recent WWF (2012: 2) report contends, “[t]he timber harvested in Eastern DRC is destined mainly for markets within the East Africa region with relatively small quantities going to domestic markets within DRC or being exported to markets outside the region.” Although the PD cites this same report, it appears to misrepresent – or, at the very least, misread – its conclusions by avoiding the issue of illegal timber from DRC altogether. For example, the PD states that “Kenya, Tanzania, and Uganda in particular are heavily affected by illegal logging, as described in a number of regional and country level studies” (PD, p. 4). Yet, the document’s authors fail to actually reference these studies, making it impossible to assess the validity of the claim upon which the programme itself is premised.

As Chevallier and du Preez (2012: 62) put it, “[t]hose concerned about the sustainability of timber flows from the DRC should acknowledge that much of this flow is regional.” Indeed, much of this timber appears to transit through Uganda to markets in Kampala, Nairobi (Kenya), and Juba (South Sudan), using the so-called “Northern Corridor” to the port of Mombasa via Nairobi, and the emerging transit corridor from Kampala to Juba via the town of Gulu (see Chevallier and du Preez 2012: Ch. 4-5). In short, these regional flows do not appear to be adequately addressed by the PD.

As a result, we recommend that the document’s authors carefully consider whether the programme should be framed as an “East African” initiative, primarily working with the EAC member states, or whether it should take an Upper Great Lakes perspective to include both the DRC and South Sudan. The extant literature suggests that the latter would better reflect the empirical realities of supply chains for illegal timber in the region. If this is thought to be infeasible, however, another alternative would be to further concentrate the pilot programme’s efforts specifically on Kenya and Tanzania,

⁵ See maps of these flows in Annexes 2-4.

focusing on the role that these countries play as exit points for illegal forest products from East Africa, the Upper Great Lakes Region, and elsewhere.⁶

2.4 ORIGIN AND ESTIMATED VOLUME OF ILLEGAL TIMBER ON EAST AFRICAN MARKETS

Despite general agreement concerning the geographical scope of supply chains for illegal timber in the region, estimates vary concerning the actual volume of timber involved. WWF (2012) claims that just over 60,000 m³ of timber was illegally exported from DRC in 2011, with the majority going to markets in Kenya (32,100 m³) and South Sudan (10,700 m³). The same report estimates that smaller amounts were exported to Uganda (8,300 m³), Rwanda (7,000 m³) and Burundi (1,000 m³), with only 2 percent (approx. 1,200 m³) of illegal timber reaching markets beyond the East African region.

An earlier report by Forests Monitor (2007) asserts that approximately 59,000 m³ of illegal timber was exported from eastern DRC in 2006. The authors estimate that 47,000 m³ – or approximately 80 percent – was exported via the DRC-Uganda border, with half staying on the Ugandan market and most of the other half transported onward to markets in Kenya and South Sudan. Only 5-10 percent of the illegal timber was thought to have been exported beyond the region.⁷ While these volumes might seem marginal, one should note that they refer to *processed* timber; for example, Forests Monitor (2007: 7) estimates that 50,000 m³ of sawn wood is equivalent to approximately 200,000 m³ of standing volume, especially given high levels of waste involved in the artisanal logging practices that are characteristic of the illegal trade (UNEP and INTERPOL 2012).

By contrast, SGS reportedly operates with much larger figures, estimating that 800,000 m³ is illegally exported from the Orientale and North Kivu provinces annually – a figure that is nearly twice the volume of official exports (cited in Chevallier and du Preez 2012: 39). This scale of illegal flows is more in line with the most recent assessment of timber harvesting in DRC, which claims that “[t]he actual log harvest in DRC is now around eight times the official harvest” and is largely destined for regional markets (Lawson 2014: 2-3).

Further, new forms of data on the scale of deforestation in the Upper Great Lakes Region are now available as a result of satellite-based land cover mapping technologies. For the purposes of the ITT-REDD programme, the most relevant of such tools is the World Resource Institute’s (WRI) Forest Atlas of the DRC, which suggests that approximately 234,000 ha of forest cover has been lost in the Orientale, North Kivu, and South Kivu provinces of the eastern DRC since 2005.⁸ Illegal logging and clearance for agricultural purposes are thought to be the primary drivers of this deforestation (WWF 2012: 5).

⁶ For example, on 28 May 2014, the BBC reported that Kenyan authorities had seized 34 containers (worth US \$6.6 million) of Madagascan rosewood en route to Hong Kong. Such cases suggest that Kenyan and Tanzanian ports are being used as transit points for illegal forest products from much farther afield than is acknowledged in the draft programme document. Full report: <http://www.bbc.com/news/world-africa-27604917>.

⁷ See Annexes 2-4 for maps of these illegal timber flows.

⁸ <http://www.wri.org/our-work/project/congo-basin-forest-atlases>

Further, the scale of this illegal deforestation is much more significant than that occurring in Uganda and Kenya, and, more narrowly, in Tanzania.

The findings of these reports concerning the geographical scope and volume of the illegal timber trade in East Africa are important for the proposed ITT-REDD programme, especially concerning risks related to leakage effects. For example, increased monitoring procedures, such as container profiling at Kenyan and Tanzanian ports, may stem extra-regional flows of illegal timber while increasing incentives to divert illegal timber to regional markets. Second, if the DRC is not acknowledged as the source of most illegal timber on East African markets, the programme will be severely limited in its ability to both adequately conceptualize and actually stem the flow of illicit forest products to East African ports. Third, the regional nature of the illegal timber trade suggests that container profiling at Kenyan and Tanzanian ports would only address a small portion of the volume of illegal timber on produced in the region, given that most is both sourced and consumed in the Upper Great Lakes Region (the EAC, eastern DRC, and South Sudan).

2.5 INSIGHTS ON THE ILLEGAL TIMBER TRADE IN EAST AFRICA FROM THE UN GROUP OF EXPERTS ON THE DRC

Recent reports of the UN Group of Experts on the DRC contribute to an enhanced understanding of the drivers of the illegal timber trade in East Africa. For example, in a 2012 report (UNSC S/2012/843, paras. 159-181), the Group of Experts concluded that recorded exports of tantalum, tin, and tungsten had almost entirely ceased from eastern regions of the country. This may be attributed, in part, to difficulties complying with the 2010 US Dodd-Frank Wall Street Reform and Consumer Protection Act (hereafter 'Dodd-Frank Act') – portions of which require American companies to verify their supply chains as being free of "conflict minerals" from DRC and surrounding countries – and also to falling prices for these minerals.

In combination with price fluctuations, such legislation appears to have unintentionally provided armed groups in the region with incentives to shift their income generating strategies to other resources, such as the Allied Democratic Forces' (ADF) efforts to raise revenue from illegal gold and timber exports to Uganda (UNSC S/2013/433, para. 96: see also S/2014/42, para. 88). The Group of Experts also alleges that senior members of the Mouvement du 23 mars (M23) rebel group also facilitated the illegal timber trade from North Kivu to Uganda prior to its dissolution in December 2013 (UNSC S/2012/843, Annex 56).

Rather than combating such illegal trade, elements within the Ugandan, Rwandan, and Congolese militaries appear to have actively engaged in its perpetuation. Indeed, the Group of Experts concludes that "Congolese armed forces continue to be plagued by criminal networks generating revenue for senior officers through their control over natural resources and contraband, including the trafficking of ivory from armed groups" (UNSC S/2012/843). The same report further alleges that the Ugandan and Rwandan militaries provided support to both sides of the conflict in the Rutshuru territory as recently as June 2012.

Such allegations suggest a degree of at least periodic collusion among all major parties to the conflict(s) in eastern DRC to both prolong hostilities and facilitate rebel financing from illegal natural resources. At its most egregious, this included alleged exchanges of natural resources or rents derived from natural resources for ammunition between criminal elements within the Congolese military and M23 (UNSC S/2012/843, para. 140). Further, although Uganda and Rwanda no longer play the same role in eastern DRC as they did at the height of the Second Congo War (1998-2003), one should note the ways in which they continue to benefit as transit countries for illegal natural resources from the country. As a much-cited UNSC (S/2001/357, para. 191) report put it, “[c]ountries in the region have indirectly and passively facilitated the cycle of exploitation of the natural resources of the Democratic Republic of the Congo and the continuation of the conflict. This has usually happened without any intent to cover up or protect some interests. That is particularly the case of countries with seaports.”

Two broad lessons can be gleaned from these reports. First, legislation concerning supply chain verification – such as the 2008 US Lacey Act Amendment, 2010 US Dodd-Frank Act, or EUTR 995/2010 – retains the potential to change incentive structures for criminal and/or rebel organizations in East Africa and the Great Lakes region. Second, however, unintended consequences of such legislation may include the diversion of illegally-obtained resources to regional markets rather than international ones. In other words, supply chain legislation and other voluntary mechanisms (such as FLEGT VPAs) may stem the flow of illegal timber to international markets while increasing supply to regional markets. Brokers of the illegal trade may find lower prices on regional markets acceptable given the smaller degree of risk involved. Consequently, new programmes to curb the illegal timber trade in East Africa must focus not only on the export of forest products from the region, but also on the networks that extract timber to meet regional demand. As noted in previous sections, such networks likely constitute the vast majority of illegal timber flows in the region, and involve criminal elements embedded within military, law enforcement, resource management, and customs agencies (Forests Monitor 2007; Chevallier and du Preez 2012; WWF 2012; Lawson 2014; UNSC S/2014/42).

2.6 CHARCOAL AND ILLEGAL TIMBER TRADE AS TWO VERY DIFFERENT POLICY FIELDS

There is a need to clarify this issue in the PD. Illegal charcoal production and the illegal timber trade are potentially very different activities. Charcoal production is carried out by millions of small-scale farmers on private or commonly-owned land, it is partly legal, partly informal, and partly illegal (Standing and Gachanja 2014). Much of the charcoal production can be seen as a last resort type of activity for landless people, young people, and destitute people without alternative livelihood options. The charcoal trade systems are diverse and include many and complicated mediators and many different actors along their respective value chains. Export is minimal compared to the total volume produced and consumed and national and regional markets. Attempts to criminalize or constrain charcoal activities through legal and coercive means have proved very difficult to accomplish and are also accompanied by substantial political costs. There is also a

challenge in that most deforestation takes place to make room for agriculture, not to produce charcoal, implying that charcoal is a side-effect of other activities and processes. This has important implications for what policies can be applied to reduce pressure on land conversion and deforestation, and will necessarily involve cross-sector approaches. Relevant policies may relate to improving intensive productivity and capacity in agriculture, to licenses and or taxes on charcoal sales, etc.

By contrast, illegal timber production is more often orchestrated by networks of professionals embedded within militaries, law enforcement, and customs agencies, requiring substantial investment and relatively advanced equipment.⁹ For example, illegal timber can be extracted from protected areas when these fall under the control of militant organizations, or from other forested conflict areas (UNEP and Interpol 2012), and the nature of these processes demands a distinct set of mechanisms, policies, and institutions from those needed to combat the illegal charcoal trade.

Although it is currently fashionable in the environment and development community to speculate about the relationship between environmental crime and terrorism, including alleged illegal charcoal activities orchestrated by Al-Shabaab and other militant groups (UNEP and Interpol 2014), these activities must be seen from the perspective of relative scale. Charcoal and fuelwood provide in excess of an estimated 90% of energy for tens of millions of households in the East African region (*ibid*), often in a context of deep poverty and livelihood insecurity. Attempts to eliminate sources of revenue for militant organizations must therefore seek to avoid criminalizing the livelihood activities of small-scale farmers, and providing often-corrupt natural resource management authorities with additional leverage to extract rents these populations.¹⁰

Further, like the flows of illegal timber discussed in the preceding sections, most of the illegal charcoal on East African markets is also consumed within the region, meaning that a narrow container profiling policy will have limited effects. Required measures would relate more to law enforcement and strict controls of trade.

In short, both the nature of the resource, the drivers behind, the actors involved, the sectors involved, the economic and legal policies and frameworks will typically be very different between the two issues. This should be better reflected upon in the PD.

2.7 HARMONIZATION WITH EXISTING STAKEHOLDER FORA AND PROCESSES

As noted above, the ITT-REDD programme aims to utilize the EAC Prohibited and Restricted Goods regulations as a common point of reference for combating the illegal timber trade in East Africa, as well as national member commitments under the UN REDD framework.

⁹ See, for example, the activities described by the UN Group of Experts on the DRC described in Section 2.5.

¹⁰ For case study evidence of conflicts between small-scale farmers and natural resource management authorities in East Africa, see Norgrove and Hulme (2006), Beymer-Farris and Bassett (2012), Benjaminsen and Bryceson (2012), Vedeld et al. (2012), Benjaminsen et al. (2013).

Unfortunately, this dual focus on UN-REDD and the EAC marginalizes a number of other relevant stakeholder fora and processes related to forest conservation and governance in the region. Most notably, the existing PD makes no mention of the Central Albertine Rift Strategic Planning Process (CARSPP) that was formulated in order to address common security, biodiversity conservation, and forest governance issues in Uganda, Rwanda, and the eastern DRC (see Chevallier and du Preez 2012: 27). Launched in 2001, the CARSPP aims to link transboundary protected area management in the Upper Great Lakes Region through the implementation of a common 30+ year vision to find solutions to interrelated security, development, and environmental governance issues (see Transboundary Core Secretariat 2006).

Another notable omission is the International Conference on the Great Lakes Region (ICGLR), which was established in 2000 by UN Security Council resolutions 1291 and 1304. Core foci of the ICGLR are regional integration and economic development, including the institutionalization of the Northern and Central Transit Corridors and related customs procedures in the Trilateral Partnership Agreement between the EAC, the Southern African Development Community (SADC), and the Common Market for Eastern and Southern Africa (COMESA). These are the two most-used routes for both legal and illegal timber from the DRC to East African and international markets (see Annexes 2-4 for maps of these flows).

Further, while Tanzania is a member of the EAC, it is also a member state of SADC along with the DRC. Uganda, Kenya, Sudan, and the DRC are also members of COMESA, and have already ascended or plan to ascend to the organization's Free Trade Area (FTA). Attempts to address the export of illegal forest products from Tanzania in particular must thus also consider the COMESA and SADC dimensions of these flows, given that portions of this potentially originate in countries outside the EAC or even the Great Lakes region (Chevallier and du Preez 2012).

2.8 RELEVANCE FOR EXPRESSED PARTNER NEEDS

As both UN REDD and FCPF member countries, Uganda, Kenya, and Tanzania have expressed an intention to address existing processes of deforestation and forest degradation in their respective territories. All three countries may also enter into official FLEGT VPA negotiations in the future (see ACP FLEGT 2012). The broad thematic focus of the ITT-REDD programme is thus highly relevant to the needs expressed by the partner countries by virtue of their participation in these processes. However, exactly how the programme will synergize and harmonize with these needs is not expressed in sufficient detail, particularly in relation to measurable indicators and an explicit theory of change.¹¹

For example, among the objectives specified in Tanzania's National REDD+ Strategy are the following: i) "to provide Tanzania with a robust system of verification of its carbon benefits to ensure that it does not claim international carbon credits which it has not in

¹¹ These and similar concerns will be discussed in more detail in Section 3.0.

fact realized”, and ii) “to provide guidance on how best to address the identified drivers, underlying causes and impacts of uncontrolled deforestation and forest degradation in the various agro-ecological zones.” The proposed ITT-REDD programme retains the potential to synergize with these objectives, as well as similar objectives outlined in corresponding documents from Uganda and Kenya. However, this has currently not been made explicit in the existing PD with an adequate degree of specificity and detail, as the PD makes only passing reference to the objectives expressed by the partner countries in their respective UN-REDD documents. Clearly, illegal logging poses a major challenge to the validity of carbon payments issued under an international REDD+ mechanism, given that its very nature ensures that deforestation occurs without the (official) knowledge or consent of forest management authorities. ITT-REDD could potentially also contribute substantial guidance on how to address underlying drivers of deforestation and forest degradation related to organized environmental crime. Such contributions should be made clearer in the PD, and linked up both with relevant state agencies in the respective partner countries (ie. UWA/NFA in Uganda, KWS/KFS in Kenya, TANAPA/FBD in Tanzania), and specific objectives in UN-REDD documents from each of the chosen partner countries.

2.9 RELATIONS TO NORWEGIAN DEVELOPMENT ASSISTANCE POLICY

An important component of Norwegian Official Development Assistance is supporting tropical forest countries in reducing greenhouse gas emissions from deforestation and forest degradation. This is evidenced, for example, by the objectives expressed by the Norwegian International Climate and Forestry Initiative (NICFI). This includes also “dealing with the challenges related to governance, corruption and illegal logging and timber trade”.¹² Norway also wants to raise environmental crime as an important issue on the upcoming UN Environmental Assembly in Nairobi in June this year, (pers. comm. Thomas Ball (counsellor, RNE Kenya; DPR to UNEP). The project is therefore considered as highly relevant to Norwegian priorities and policies of development cooperation.

3. PROGRAMME STRUCTURE AND DESIGN

3.1 PROGRAMME DESIGN

3.1.1 The project development process

National ownership. The projects’ planning processes is poorly described in the PD. It is unclear how – and by whom – the programme was conceived. In a FLEGT workshop sponsored by FAO, the participants recommended improved collaboration between regional bodies and initiatives to address illegal behavior and to strengthen efforts and data availability in order to understand trade flows and the legality of products shipped. As it appears the UN organizations took the these ideas further and a ’ workshop was

¹² For example, see: <http://www.regjeringen.no/nb/dep/kld/kampanjer/regjeringens-klima--og-skogprosjekt/hvorfor-regjeringens-klima--og-skogprosj.html?id=734167>

organized in March 2014, where national stakeholders were invited. During this meeting, concerns were raised and needs for combatting illegal logging identified.

In general, how national governments - and what government institutions - have been included in the planning process remains uncertain, as does the national political and financial commitments to the programme. Except from letters of recommendation from Interpol's National Coordinating Bureaus in the respective countries, no evidence of national ownership have been demonstrated at all. Considering the sensitive nature of the programme, this is important, and it is recommended that better national commitments are both secured and documented. Talking to representatives from national UN representatives present in the Nairobi march planning workshop on a draft PD, which seems as being only time that national actors have been involved in commenting on the PD, leaves a sense of a lack of formal participation and more grounded commitment from national authorities. Most of the Nairobi participants state that they were there as "technical representatives" and many had not seen/and or commented the final PD before submission. A general concern raised by various stakeholders in the evaluation of the Tanzania UN REDD Programme was that " ... the UN largely drove the design process and the consultation process was insufficient, too short and perceived as seeking endorsement of preconceived ideas." In order to avoid this happening to this particular programme, it could be advisable the UN REDD National Programme Handbook guidelines on participation as far as possible are followed.

Coordination with similar activities. All of the programme partners already receive funds for similar activities from Norway, either through the UN REDD Programme, ORGFORC or the LEAF project. Joint planning and coordination of activities across the region is assumed to be ensured through the steering committee and the regional taskforce. The FAO FLEGT programme is another initiative which the current programme will be linked up with. So far FLEGT has funded 7 projects in the region. There are, however, no formal FLEGT processes/negotiations taking place in any of the three programme countries. A question is how then the programme will test-drive the mutual enforcement between REDD+ and FLEGT, which is a major goal of the programme? This question is not explicitly addressed by the PD.

The programme also aims at building on and complementing activities already carried out by Interpol, UNODC and UNEP, together with partners in the LEAF and ORGFORC projects. These projects work in different ways on combating organized forest crime. The PD describes complementing value of this programme in short terms. Besides from the container profiling and filling of technical gaps the added-value of this programme is vaguely described. We therefore recommend the PD to address issues of coordination and how ORGFORC and LEAF activities feed into the REDD+ITT project. This counts also for other previously involved institutions, such as GRID Arendal.

As we discuss above in Section 2.6, how the programme is coordinated with other relevant activities is not well addressed. How the programme will interact and be embedded in key regional initiatives and fora, such as the COMESA, the CARSP or the

ICGLR should have been further detailed in the PD. Regional and national ownership is poorly documented, and if not taken into account, it could become a major challenge for programme implementation. Close ties and collaboration with COMESA, as the main forum for economic integration and trade in the region, seems key. Other initiatives on illegal trade of timber and charcoal, such as the Regional Land Management Unit, which over the past years has conducted a series of workshops to discuss charcoal trade in the region, are also left out of the proposal.

Programme phasing. The phasing of the programme is unclear. It is for instance uncertain what the inception phase will include, except that a work plan and an M&E framework will be established. The inception phase will also include the identification of training needs, which in turn will culminate in an inception report. The inception process is also supposed to address national ownership. Precisely how this will be accomplished is not articulated in the PD. We therefore recommend a monitoring and work plan for the inception phase up ahead to the next steering committee meeting. Some benchmarks and indicators of success for the inception phase should also be developed at this stage.

Coordination with REDD+. Further questions arise concerning the difference between activities proposed by ITT-REDD and existing, donor-supported readiness activities related to capacity building. Only Tanzania has a UN REDD Programme being implemented, but both Uganda and Kenya are UN REDD partner countries. Nevertheless, both Kenya and Uganda receive readiness funds through the World Bank Forest Carbon Partnership Fund (FCPF), which in principle is streamlined with the UN REDD Programme's goals and objectives. How this new mechanism for illegal logging and trade will be streamlined into national REDD+ readiness efforts is not well elaborated upon in the proposal, but it is assumed that this will be addressed in the SC, where UN REDD has observer status. Making space for national UN REDD and FCPF focal points in the coordination processes could increase the effectiveness and added value of the programme further. The evaluation of the UN REDD Programme revealed that limited national coordination and inter-agency collaboration, low national institutional and technical capacity led to unforeseen overlaps and administrative challenges that affected the impact of the program (Gapare and William 2013). By including key national stakeholders in the key forums at an early stage in the process could reduce the risk of the similar challenges within this program.

Collaboration with civil society and NGOs. The PD alleges that civil society organizations will play a major role in the programme. In collaboration with UNDP, FAO will hold the primary responsibility for coordinating this. From the proposal it is, however, unclear how – and with which civil society organizations – this will be pursued.

Donor activity and coordination. The PD presents a number of other intervening organizations present in the programme countries, but limits itself mainly to activities where the partner organizations are involved themselves. As mentioned above, there are a number of relevant actors that the PD, to a limited degree, analyzes and recognizes the need to coordinate planned activities with. This should have been analyzed and

elaborated further upon in the proposal. Norway also has a long-standing role and activities related to forest sector management both in Tanzania and in Uganda. Some of these could have relevance to the project (e.g. Norwegian support to the EAC's Lake Victoria Basin Commission [LVBC] and the Mount Elgon Regional Ecosystem Conservation Programme [MERECP]) How the current project relates to these remains uncertain. In addition, experiences made in other similar activities supported by Norway in other areas could also have been explored. For example, Outcome 6 of the UN REDD Phase II programme in Vietnam contains components for supporting regional collaboration to curb illegal trade within the region, including technical assistance for VPA negotiations, support for regional discussions and sharing of experiences, enhanced collaboration between government partners, developing better controls and increased transparency, review of export license decision-making mechanisms, quota management and monitoring, etc. (UN REDD Programme 2012) that could be of relevance also for this programme.

3.1.2 Quality of underlying analyses and planning activities

Regional cooperation has been identified as a crucial issue for combatting illegal logging and trade in the region (e.g. addressed, amongst other things, in FLEGT Workshop, Kenya November 2012). As such, the planned programme addresses issues of relevance and concern. It is, however, unclear exactly what type of analyses that have been carried out to justify the objective(s) of this particular programme. No baseline is presented (discussed more below), and the mix of thematic areas (i.e. illegal logging and charcoal trade) is (sometimes) confusing. The actors, structures, and the livelihoods systems that these two sectors support are often very different (see Standing and Gachanja 2014, Ch. 3). Charcoal, for instance, meets the energy demands for approximately 80% of urban households in Sub-Saharan Africa (Zulu and Richardson 2013). Approaches to curb production, trade and consumption of charcoal are therefore necessarily also very different from illegal logging. Reducing household dependence on charcoal requires alternative income opportunities for farmers, affordable alternative energy sources for urban households, and more efficient and sustainable approaches for producing and using charcoal (Zulu and Richardson 2013). Interpol and UNODC have considerable experience with working with law enforcement and illegal trade. The organizations' experience with dealing with complex issues related to charcoal production, trade and consumption remains, however, uncertain. How necessary expertise on illegal charcoal trade will be drawn into the programme should have been described in the PD.

As discussed in Sections 2.3-2.5, the extant literature suggests that most illegally logged timber in the region is consumed regionally (Forest Monitor 2007; Chevallier and du Preez 2012; WWF 2012). As also stated above, much of the timber consumed in Uganda, Kenya and Tanzania are sourced in other neighbouring countries, such as the DRC and Mozambique. To what degree these studies have been taken into account in the programme is unclear. More broadly, given that these studies estimate only approximately 5 percent of illegal timber is exported from the region, will the chosen emphasis on container profiling and checking actually address the underlying drivers of the illegal timber trade in the region? We recommend that novel pilot measures are developed and tested out to address the 95% illegal timber trade within the region

3.1.3 Assessment of the results framework

The overall objective of the project is clear and verifiable. This is: *Enhanced national and regional capacity to prevent illegal timber trade as a driver of deforestation and degradation in three Eastern African Countries.*

It is, however, unclear where and how the charcoal component fits into this overall objective.

Linkage between different result levels. The presented results framework is also not correspondingly clear and consistent. The project is admittedly complex, involving multiple sectors, scales and actors. The results framework presents 4 related outcomes that are intended to lead to the overall project objective. These are:

1. Awareness and knowledge raised among stakeholders on the magnitude of, and options to address, illegal timber trade in East Africa
2. Enhanced national law enforcement, judiciary and prosecution capacities to combat illegal timber trade combined with establishment and support to the implementation of container profiling units for timber in East Africa
3. Key areas to strengthen the institutional & regulatory framework for sustainable timber production & trade are identified
4. The regional initiative on illegal timber trade is well managed, serves to raise the issue politically among national governments and sets a model to replicate in other regions

Linked to each outcome there are a number of planned outputs and activities. However, the framework does not clearly articulate a theory of change or causal relationship between the different results levels, i.e. explaining more clearly how outputs and outcomes will lead to the overall objective of the program. The results framework should more systematically display the causal relationships between its elements over time.

Articulation of outcomes and outputs. Some of the planned outcomes are not clearly formulated and are a mix of different results levels. For example, output 2 under Outcome 2: *“Build the national law enforcement capacities, judiciary and prosecutorial capacities to combat illegal logging and trade and establish and support the implementation of container profiling units for timber in East Africa.”* Wouldn't “...implementation of container profiling units for timber in East Africa” here be a planned output/means to achieve the overall outcome, namely enhanced enforcement capacities?

Further, the way in which the outputs are formulated makes it difficult to measure the extent to which they might be fulfilled, e.g. ‘Outreach, media engagement & publications’, ‘Key stakeholders, from different constituencies, build consensus on how to address illegal timber trade’, ‘Engagement of policy makers and regional bodies’, ‘knowledge management’, etc. The phrasing of these outputs is not sufficiently precise to function as

a basis for the monitoring of results. Relevant, precise and clear indicators can compensate for this, but the project document fails to present any relevant indicators for the different results level, at least at lower level of results chain (this will be discussed more below).

3.1.4 Information needs and knowledge gaps

As documented in Section 2.0, there is a lack of information and knowledge gaps that seriously hamper programme design and rationale. The PD discusses the importance of collecting and processing relevant information and knowledge, but offers no coherent or systemic review of the existing literature on the illegal timber trade in East Africa.

3.1.5 Monitoring and evaluation

The PD should be clear about the monitoring and evaluation of activities, outputs and outcomes as separate from the evaluation of the overall programme objective. The focus now is on the latter, while we believe that this is quite difficult (even impossible) to undertake given the short time frame of the programme.

Monitoring indicators. According to the PD, impact indicators will be identified during the first three months of the programme. Nevertheless, the PD suggests relevant monitoring proxy indicators for the highest result level, i.e. for the overall objective of *enhanced national and regional capacities to prevent illegal logging*.

These are suggested to be:

- *% loss of forest areas* (question about attribution of illegal logging here, how to differentiate with other activities, such as agricultural expansion, etc.?)
- *trans-border trade volume and legality of products,*
- *estimates of charcoal production, trade and usage*
- *estimates of legal sources for these products,*
- *% of legal shipments of wood products through key ports,*
- *volume of timber monitored through chain of custody processes,*
- *Number of permits legally allocated.*

Examples of other relevant impact indicators could include monitoring forest degradation caused by the extraction of key exotic species, or deforestation that is primarily linked to charcoaling rather than land clearing for agricultural expansion.

The PD acknowledges that – due to the complexity of the programme (awareness raising and behavioural change across a wide range of actors) – it will be difficult to monitor the programme, and that indicators therefore will change and fluctuate over time. The Appraisal Team acknowledges that the effort to develop relevant indicators for expected results will be an ongoing and challenging process. At the same time, the complexities of such a (pilot) project also warrant appropriate monitoring indicators developed for the lower levels of the results chain. It would be advisable that the results framework is further elaborated in the PD, the links between the different results levels clarified, and

that appropriate results indicators are developed for all levels, together with clear justifications for all of them.

Baseline information is missing. The setting of a baseline is critical for results monitoring. The indicators are of little use as a practical tool for results monitoring if concrete baseline information is not established. The setting of baseline should be prioritized in the initial stage of the project. This also implies that clear and precise indicators are defined. Without a program design that has indicators connected to a baseline, the measuring of results becomes almost impossible. We note that a M&E framework will be established during the inception phase, but it could be expected that an intermediary baseline including a thorough review of the most relevant publications on illegal timber trade in the region was presented. In addition a detailed work plan, benchmarks and indicators of success for the inception phase should be included in the PD.

M&E budget. The PD states that the complexity of the project calls for comprehensive monitoring and evaluation. Thus, 10 percent instead of 5 percent of the implementation budget has been allocated for. Who will be responsible for the M&E is, however, unclear since the responsible staff and office have not been identified in the PD.

3.1.6 Consistency (goal, objective, outputs, inputs, budget outline)

As outlined above in section 3.1.3, there are inconsistencies and gaps in the results hierarchy of the programme. It would be recommended that the framework is revisited, and that clear linkages between output, outcomes and objective levels are established, together with justified results indicators. Issues concerning inputs and budget outline will be discussed under paragraph 3.3.

3.2 INSTITUTIONAL SETUP

3.2.1 Institutional and organizational structure of the programme

In order to ensure coordination and coherence, the PD outlines a three-tiered administrative model. The following three institutional structures are included:

- 1. The steering committee (SC)** will “... oversee coordination among the implementing agencies, liaise with the MPTF, endorse work plans and budgets, monitor and ensemble of the initiative, solve corporate, operational or political challenges as they emerge, and ensure due reporting”. The SC will be constituted by the project partners, the donors (i.e. Norway) and the UN REDD Programme. The committee will meet three times during the lifetime of the programme.
- 2. The Regional Task Force (RTF)** will be a joint international and country team forum to provide both technical and implementation oversight to the regional initiative. The RTF will convene at least once year and be composed of country representatives and international partners. The programme team will serve as the secretariat of the task force and its meetings.

- 3. The Programme Team (PT)** will consist of about 10 full positions (when adding up number of full and part-time positions) in the different constituencies. Main office will either be in UNEP, UNDP or in FAO in Kenya. The PT will meet once a week, and will be responsible for elaborating budget, plans etc. to be approved by the RTF and in turn endorsed by the SC.

The programme will be organized as a UN REDD Tier 2 activity, meaning that it is under the UN REDD umbrella, and as far as possible aligned and consistent with the guidelines developed by the UN REDD Programme. The programme will, however, be outside of the UN REDD Policy board formal constituency.

The institutional setup seems comprehensive, but potentially oversized and bureaucratic considering the size and timeframe of the project. This is a pilot, and beyond this the programme's conceptualization of its own future appears to be unclear. Where will it be hosted and how will it be managed? The future regional, national and local ownership of this seems not to have been considered in the institutional setup. Is the staffing setup appropriate to ensure the future national ownership and outreach?

3.2.2 Assessment of the involved partners and agencies

FAO will be the main responsible for overall partnership coordination. This is reasoned in FAO's long-term experiences with similar work in the region, e.g. in the FLEGT processes. In addition to the overall coordination responsibility, FAO will have the responsibility of outcomes 3 and 4 in the programme. Outcome 4 is related to enhanced capacities for monitoring, statistics, gap analysis and definitions of legal timber and standards for trade. Considering FAO's involvement and experience with supporting countries in establishing MRV systems globally, and with FLEGT in the region, this seems like a reasonable responsibility area. Outcome 4 is related to general management issues, awareness-raising amongst governments in the region, and knowledge sharing with other regions.

UNDP and UNEP. Together UNDP and UNEP will hold the primary responsibility for Outcome 1 activities, related to knowledge and awareness-raising amongst stakeholders. Though the rationales for the division of labour between the two organizations are not clearly spelled out, it is assumed that UNDP will have the main responsibility for the more operational activities, while UNEP will handle the more normative and analytical aspects. It is, however, not explicitly clear why UNDP e.g. will have the responsibility of carrying out analytical assessments of timber chains, etc. in the region, and why not UNEP? Further elaborations on coordination and added-value of UNDP vs. UNEP would be welcome in the proposal. In order to avoid unnecessary administrative burdens on the partner countries, as few partner organizations as possible would be warranted.

UNODC. Together with Interpol, UNODC will be responsible for Outcome 2, including the establishment of the container profiling units, capacity building of law enforcement authorities, investigators and prosecutors, rangers, and support to transnational organized crime units to address illegal logging and related offences. This seems rational

considering UNODC's previous work and experiences with container profiling in ORGFORC.

Interpol has sole responsibility for one programme output component, namely to establish a regional training academy to serve as a knowledge hub in the region for law enforcement agencies. It is assumed that Interpol in its capacities of working with organized international crime also is involved in some of the other output areas together with UNODC under outcome area 2.

We also suggest that a brief assessment of possible national partners should also have been included in the PD. These include key national resource management partners such as Tanzania National parks(TANAPA), Tanzania Forest Service(TFS), the Forestry and Beekeeping Division, Ministry of Natural Resources and Tourism (Tanzania), Uganda Wildlife Authority (UWA), national Forest Authority (NFA),Kenya Forest Service(KFS) and Kenya Wildlife Service (KWS), as well as similar institutions in law enforcement, financial and judicial institutions.

3.3 FINANCIAL MANAGEMENT AND BUDGET ALLOCATIONS

3.3.1 Financial management structure and cash flows

UNDP's Multi-Partner Trust Fund (MPFT) will be the project's fund manager. MPFT will act as a trustee for the funds as a 'pass-through' mechanism. MPTF will administer and disburse funds to the respective project partners for their planned activities upon approval of the Steering Committee. The project partners will in turn be accountable for their respective activities and budgets.

3.3.2 Budget by programme items

The budget is linked to the planned output levels, and gives very little insight as to what activities and inputs the funds will be spent on. It is therefore difficult to assess whether the planned costs, unit prices, etc. are reasonable. It would therefore be advisable to elaborate as detailed budget as possible, according to UNDG Joint Programming Format. What is referred to as *indirect administrative costs* are estimated to be 7%, but it is not clear exactly what the costs entail in relation to direct administrative costs. From the current budget, it is nearly impossible to assess whether there are any 'hidden' administrative costs in the other outcome areas. Further, it is assumed that more detailed budgets will be presented in the programme's work plans.

Future financial setup. There is no indication of how this system would fit or be integrated with existing budget and disbursement systems of the respective governments, or the EAC. The programme developers may wish to consider the relationship between ITT-REDD and existing financial REDD+ mechanisms in the region, as well as potential resources from the Green Climate Fund.

4. ASSESSMENT OF SUSTAINABILITY AND RISKS

This section briefly addresses the quality of both the overall programme and its respective components; specifically, we consider the likelihood of whether programme outcomes will be sustained and developed further after donor and UN withdrawal. We discuss sustainability and risks related to the following issues: overall programme features, degree of policy support, economic and financial matters, human rights, environmental issues, socio-cultural and gender aspects, and institutional and organizational issues.

4.1 PROGRAMME FEATURES, LONG-TERM SUSTAINABILITY, AND RISKS

ITT-REDD is intended to be a pilot programme with innovative demonstration properties. The programme is therefore by itself not designed nor scaled to solve the overall, comprehensive challenges in the region, and it is intended only to deal with certain aspects and a rather limited range of deforestation and degradation issues in the three countries, given the time and resources proposed set in. This is our interpretation of the potential PD outcome- despite the ambition of the PD stating a wish to address the “underlying drivers” of the ITT.

The suggested support is thus limited relative to the overall needs in the region, programme activities are pilot and demonstration projects, and other donors, national bodies/and or NGOs/CBOs would have to carry out such efforts on a larger and broader scale in the future. A main programme ambition is to show how management challenges related to the illegal timber trade may be handled, and positive experiences might hopefully be replicated elsewhere in the region or in developing countries in general. It must be stated however that the outcome ambitions stated up front in the PD are somewhat less modest than this. We would suggest a more conservative level of ambition, and put more emphasis on explicitly testing out novel particular pilot and demonstration activities for future larger scale implementation.

As discussed in Section 2.0, the overall programme intention appears to be sound. In what follows, however, we identify some shortcomings and make recommendations for how to both delimit and improve the PD and its potential outcomes in relation to sustainability and risk issues.

- 1) The suggested programme duration of two years seems unrealistically short and should be reconsidered. If future phases are in fact thought of or planned, they should be outlined in the PD.
- 2) There is a lack of clear provisions and plans for how activities and processes will be continued upon donor withdrawal and when the role of UN as facilitator for the programme is phased out.
- 3) Consequently, there is a risk that the programme – which is to a large extent staffed by UN and paid by bilateral donors – does not enhance opportunities for integration and capacity building, and this may isolate the programme from

national or regional policy development. This would threaten the long term sustainability of the programme and increase risks of programme failure. One should consider to integrate in the programme's working plan a mechanism whereby more and more of UN's responsibilities, including financial flow, physical assets and staffing, will be handed over to the involved regional (where relevant), national, local and even community structures during the lifetime of the (extended?) programme. Long-term sustainability of the programme activities as well as institutional and organisational mechanisms are key issues in this context. We recommend that such a time-bound plan is developed immediately after a mid-term review; and that a set date is given for its gradual implementation. In discussions with the UN, this issue was raised directly, and one idea that emerged is to consider the EAC secretariat as a possible heir to the present arrangement.

- 4) The various UN agencies and their suggested project elements (4 outcomes) could be expected to be run reasonably well considering the experience of each respective organization. However, it would be of interest to have a stronger justification for why a joint design adds value to the programme, compared to letting the agencies run individual projects. A further concern relates to whether the suggested programme secretariat will actually be able to harvest these joint programme benefits in practice. In parallel, the role of FAO as lead implementing agency should be made clearer in the PD. How will the Governments communicate to the programme? Will this be through the FAO?
- 5) Considering needs for capacity building in involved local administrative structures in the three countries, particularly related to the management of a joint programme for the future, and the long-term institutional sustainability of the programme ambition, one needs to identify regional and national actors such as EAC or others that can assume (future) responsibilities for such a programme. We ask the question, though, if this programme approach of more or less separate programme objectives and activities are best served by a joint future model. It could, though, be considered as part of a novel pilot and demonstration model; but then more carefully thought out and implemented, securing national, cross-sectorial and regional ownership.

4.2 PROGRAMME COMPONENTS, LONG-TERM SUSTAINABILITY, AND RISKS

4.2.1 Policy support measures, sustainability and risks

- 1) From the PD, we cannot see that much formal contact has been sought with national governments at all in the programme planning process. There is scant documentation of support in the PD, except a reference to an EAC custom's declaration on prohibited and restricted goods, and letters of support from INTERPOL's National Coordinating Bureaus. This lack of support and collaboration must be rectified in a comprehensive way including work with national governments on the PD itself. This is a serious weakness of the PD.
- 2) The three countries do have some legislation in place for combatting illegal timber trade, but most countries have very vague policies on charcoal production

and trade, most likely reflecting the difficult political and economic trade-offs between forest and agricultural land on this matter. A revised PD should acknowledge these challenges.

- 3) The PD argues that a regional perspective is the most effective way to “reduce political sensitivities at national level by providing a regional platform to forest governance issues.” We question that statement. We would rather stress the importance of having a national level ownership precisely to secure legitimacy and political ownership to the programme. One should also follow up more on the mentioned MOUs between the involved countries.
- 4) National level actors are expected to participate in a Regional Task Force, which will meet once a year (twice in programme lifetime). The PD should consider whether this is sufficient to ensure national ownership.
- 5) From a national perspective, the illegal timber trade may be politically easier to support than the trade in charcoal, as the latter involves an activity typically undertaken by a massive amount of poor, small-scale farmers. This trade is partly legal and partly not, and such informality makes law enforcement both practically and politically challenging.
- 6) The PD takes up issues around corruption as a risk, but does not flesh out particular anti-corruption measures, such as the use of preventive mechanisms including principles of participation, transparency and accountability (through community forestry management, land use planning; Redd+activities etc.). Of course, the national actors involved in the illegal activities and in corruption may be part of the programme’s governance structures, and special attention must thus be given to such governance and corruption risks. Furthermore, how corruption and governance issues within the programme itself will be addressed is not mentioned in the PD.
- 7) Overall, the formal and not least informal support to some of the policy measures suggested are not self-evident. Conflicts of interest with both individuals and organizations in the partner countries are to some extent underplayed in the PD and should be addressed better to secure programme sustainability.

4.2.2 Economic and financial matters, sustainability and risks

- 1) A pilot and demonstration activity will often not be cost-efficient, and is frequently extremely donor dependent, as in this case. One will often not be looking for cost-recovery measures as one tries to establish and test out new and novel activities. In this case, controls and fees collection, impounding charcoal and exotic trees could bring funding into control activities and thus point forward towards some kind of cost-recovery for the future. This could be further explored in a revised PD.
- 2) There is little provision for funding national and local level actors. Especially in the case of working with charcoal issues, this may hamper project sustainability and increase risks.
- 3) There is furthermore no mention of co-financing suggested from the Governments of Tanzania, Uganda and Kenya, nor any assessment of co-funding from other projects or programmes such as from REDD+.

- 4) Component 2 on enhanced law enforcement seems costly (50% of total budget). One could consider involving actors from other developing countries who have been through similar training and who may accept lower salaries? One should also have a perspective of “training the trainers” here to secure activity sustainability for the future.
- 5) Ten percent of total funds on monitoring and evaluation seems excessive for a project that lasts 24 months.
- 6) The PD might deliver a cost-benefit analysis of the project’s law enforcement activities; using material from the project outputs (perspectives from UNEP/Green Economy, for example), to assess social costs and benefits of the programme, that could add to long term supports and sustainability of the programme activities.

4.2.3 Human rights, sustainability, and risks

- 1) Human rights approaches emphasize fundamental rights to basic necessities for an adequate standard of living, including employment, land tenure, nutrition, shelter, social security, health care and education, all of which are particularly important for the poor. A general worry when enforcing stricter rules for resource use is that it entails alienation of poor people from the natural resources that are essential for their livelihoods. In particular, the governance of the trade in charcoal faces this dilemma. This will also make it difficult for national- and even local authorities to (want to) prevent the charcoal production and trade. Other initiatives to formalize the charcoal trade in a more sustainable and equitable direction should be highlighted and included in the PD.
- 2) A hard-handed law enforcement approach on charcoal may set programme targets at risk and be counterproductive to national and local support for programme activities. There is a risk that the programme’s focus on law enforcement and strengthening of such institutions capacities will risk human rights abuses and violations of traditional rights of access and use of forest resources. How this will be addressed is not taken up in the PD, making it difficult to know the nature and level of risks involved.
- 3) If the project wants to deal with charcoal, a major challenge is that there are both formal and informal rights related to both its production and trade. The informal charcoal trade should not be conflated with the illegal charcoal trade.

4.2.4 Environmental aspects, sustainability, and risks

- 1) This PD expresses ambitions related to environmental sustainability and biodiversity conservation in addition to combating the illegal timber trade. If the project is successful, there will be substantial and lasting environmental, climate and biodiversity benefits to be harvested. These benefits could be highlighted more strongly in a revised PD.
One challenge is related to how to address illegal or excessive charcoal production and trade. There is little in the PD articulating novel pilot and demonstration activities on the charcoal and related environmental issues, which risks programme failure in relation to these goals.

4.2.5 Socio-cultural aspects, gender and sustainability and risks

- 1) Similar to the general human rights dimensions of sustainability, a number of risks pertain to socio-cultural and gender related issues. This is little addressed in the PD. There is a variety of forest-dependent indigenous groups (such as the Batwa, Ogiek, or Sengwer) living in and around tropical forests that may be affected by law enforcement activities related to the illegal timber trade. They may also be affected by a ban on charcoaling which potentially forms one aspect of their livelihoods.
- 2) **Gender** issues are not specifically mentioned in the programme. Women's organizations such as WOCAN have pointed to the issue of women being left out of important REDD+ processes. To improve the effectiveness of REDD+ and other environmental programmes and activities, greater inclusion of gender concerns in forest policies, programs and projects should be enhanced. Women tend to depend more on forest resources than men and will be more impacted by reduced access and use. We therefore recommend that measures in the PD towards charcoal regulation must have this in mind.

4.2.6 Institutional and organizational sustainability and risks

The PD lacks a coherent and consistent presentation and assessment of present status of PD-related activities in the three countries upon which this programme should build, particularly in relation to existing legal frameworks, regional organizational bodies (such as the EAC and ICGLR) and national institutions.

We thus do not think that there is a clear integration of project activities within the partner countries' ongoing work; ITT-REDD rather seems to run in parallel to existing state activities.

We cannot see from the PD that the partner countries will make the relevant government staff available for the project activities, and we do not know if these then have assigned resources, authorities and responsibilities as defined by government strategies/plans. Further:

- 1) The project time frame (24 months) is too short for generating activities that will be sustained after the programme. Implicit in the PD is an ambition for future stages or phases of these activities. This should come up much clearer in the PD under the "Planning next steps", not least to secure that the pilot and demonstration activities are to be taken further.
- 2) As stated earlier, the omission of countries like DRC from a programme trying to deal with illegal timber trade in East Africa jeopardizes the sustainability of the PD and the risk of not achieving programme outcomes. This should be dealt with in the PD.
- 3) The technical mechanisms suggested for the illegal timber trade – law enforcement and the container profile units – may be adopted and seem viable also when national governments take over. Issues around costs and willingness to continue and develop these technologies further remains to be seen.

4.2.7 Comments on the PD Annex 4 risk assessment

The risk assessment (1-4) raises issues of general concern such as national and sub-national commitments, interaction between government agencies, and donor coordination, but little is said about what to do to counter these challenges in the PD nor in the matrix itself. They further (5-8) discuss issues that may delay or constrain implementation such as programme management itself; for example, actors from outside with an interest of trying to delay action on national policy processes. But again, not much is suggested to prevent these issues, neither in the PD nor in the matrix itself, aside from simply asserting that such challenges will be dealt with. In Appendix 6 we suggest a revised matrix for the consideration of sustainability and risks.

5. RECOMMENDATIONS

5.1 OVERALL RECOMMENDATIONS

The presented PD needs a major revamping , prior to a resubmission. There is first and foremost an immediate need for **increased national anchoring**, both in the planning of the project and the revision of the PD, the structure of the PD and in the implementation. National anchoring must include relevant state and regional bodies on natural resources, law enforcement, finance and the judiciary and that take part in the PD revamping and resubmission. This is an immediate recommendation.

We have been asked to suggest a distinction between short- and medium term recommendations. As we suggest a major revamping on a number of important issues and of the whole PD before resubmission and before any funding is considered, this distinction is not so helpful for decisions at this point in time. For a possible support to speed up a revision of the PD one could consider a seed funding, establishment of MOUs or other mechanisms.

5.2 PROGRAMME RATIONALE, SCOPE, AND RELEVANCE

1. The ITT-REDD programme should be conversant with relevant demand-side legislation in the US (2008 Lacey Act Amendment), EU (EUTR 995/2010), and Australia (2013 Illegal Logging Prohibition Act) so as to reduce the transaction costs entailed by compliance and assist East African producers of forest products to conduct their business in a lawful manner. If timber producers perceive compliance as being too costly or onerous, such legislation may actually provide incentives for participation in illegal markets, and inadvertently lend market advantage to countries without such legislation (such as China or the Gulf states). The ITT-REDD programme should be cognizant of such risks, and work to avoid both of these outcomes.
2. The document's authors should carefully consider whether the programme is best framed as an 'East African' initiative, primarily working with the EAC member states, or whether it should take an Upper Great Lakes perspective to

include both the DRC and South Sudan. The extant literature suggests that the latter would better reflect the empirical realities of supply chains for illegal timber in the region. If this is thought to be infeasible, another alternative would be to further concentrate the pilot programme's efforts specifically on Kenya and Tanzania, focusing on the role that these countries play as exit points for illegal forest products from East Africa, the Upper Great Lakes Region, and elsewhere.

3. ITT-REDD must consider programme design risks related to leakage effects. For example, increased monitoring procedures, such as container profiling at Kenyan and Tanzanian ports, may stem extra-regional flows of illegal timber while increasing incentives to divert illegal timber to regional markets. In other words, supply chain legislation and other voluntary mechanisms (such as FLEGT VPAs) may stem the flow of illegal timber to international markets while increasing supply to regional markets. Brokers of the illegal trade may find lower prices on regional markets acceptable given the smaller degree of risk involved. ITT-REDD should include provisions for how it seeks to control the flow of illegal timber consumed on regional markets.
4. The PD is generally focused on illegal timber trade, but it suggests also that a range of activities for timber trade to be applied to address illegal charcoal. However, it seems as if the PD do not differentiate well the difference between political contexts, drivers, instruments and measures needed to address the two extremely different policy challenges. The container profiling approach is hardly an efficient approach to address illegal deforestation and charcoal production, and trade. We thus recommend to either improving the approach on charcoal in the PD, or to concentrate on illegal timber trade and leave out the charcoal component. If the charcoal component is retained in the PD, the approach must be clearly spelled out, and necessary competence and expertise on charcoal production and trade must be included in the project.
5. Since the PD does not acknowledge the DRC as the source of most illegal timber on East African markets, the programme is limited in its ability to both adequately conceptualize and actually stem the flow of illicit forest products to East African ports. The regional nature of the illegal timber trade suggests that container profiling at Kenyan and Tanzanian ports would only address a small portion of the volume of illegal timber produced in the region, given that most is both sourced and consumed in the Upper Great Lakes Region (the EAC, eastern DRC, and South Sudan). ITT-REDD should articulate how it plans to address networks that extract timber to meet regional demand, which involve criminal elements embedded within military, law enforcement, resource management, and customs agencies, many of which are linked to conflicts in the eastern DRC.
6. ITT-REDD should outline how it plans to harmonize with relevant stakeholder fora and processes related to forest conservation and governance in the region, which are excluded by the current PD. Most notably, these include the Central Albertine Rift Strategic Planning Process (CARSPP) and the International Conference on the Great Lakes Region (ICGLR). Linkages could also be formed with forest product-related provisions of the Common Market for Eastern and Southern Africa (COMESA) and its regional Free Trade Area.

7. ITT-REDD should outline precisely how it plans to synergize and harmonize with the needs outlined by the partner countries in their respective UN-REDD and FCPF planning processes, preferably linking up with specific objectives. The relevance of ITT-REDD for these processes is currently not expressed in sufficient detail, particularly in relation to measurable indicators and an explicit theory of change. The PD might also articulate how it may lay the foundation for future FLEGT VPA negotiations.
8. Once linkages with UN-REDD and FCPF objectives are more clearly articulated and indicators are identified, UN-REDD should identify possibilities for involving relevant personnel from national resource management agencies. These include institutions such as the Uganda Wildlife Authority and National Forestry Authority; the Kenya Wildlife Service and Kenya Forest Service; and Tanzania National Parks (TANAPA) and Forestry and Beekeeping Division (FBD).

5.3 PROGRAMME STRUCTURE AND DESIGN

1. Improve the coherence of the project's results framework, including the links between overall objective, outcomes, outputs and inputs, together with appropriate monitoring indicators for the respective results levels. The project should also develop baselines for the respective results levels. The PD should also be accompanied by a detailed work plan for the inception phase of the project.
2. One should develop a clearer profile on what are the novel pilot and demonstration properties of the suggested project.
3. The regional ambition is not well justified in the PD and costs and benefits of a regional versus national approaches should be carefully assessed in the revised PD.
4. In order to diminish the administrative burden of the recipient countries, one should reconsider if all five suggested implementers need to be involved.
5. The PD needs a clearer organizational structure for project implementation and management where authority, rights and duties and resources (and budgets) are spelt out in total and between actors, also in relation to its role as a pilot and demonstration lighthouse for the region.
6. The role of the various levels of organizations should also be clearly spelled out in the PD. It would be advisable that local and national level units as far as possible get the responsibilities of project implementation and planning in order to ensure the efficiency and sustainability of the project. Clarifying the roles of local authorities and communications lines between the project and national partners would also be warranted.
7. It is recommended to clarify budgets related to administrative costs and to costs related to the container profiling, where one could consider south-south co-operations. Budgets should be as detailed as possible within the UNDG Joint programming format.
8. The PD should elaborate further upon donor coordination and added values of the new project relative to the existing support through LEAF and ORGFORC projects- also supported by Norway.

5.4 SUSTAINABILITY AND RISKS

There are several risks and uncertainties not well addressed in the PD. In order to address these we suggest the following:

1. A stronger national anchoring and phasing in of national authorities to take over UN leadership will improve both the long-term sustainability of the project, and the risks of failing of achieving programme objectives. The processes outlined in the UN REDD Programme's National Programme Handbook guidelines on participation could be of use to the project in this regards.
2. A stronger emphasis on safeguards against corruption and bad governance both in the project activities and in project management activities itself should be incorporated in the PD.
3. Strengthened formal law and enforcement tends to exclude poor, destitute, indigenous people and tends to have a gender bias in the forest sector. These aspects must be addressed more clearly in the PD.
4. While the outcome of the programme has explicit environmental ambitions, one should discuss clearer how to secure the potential environmental benefits of a charcoal component, not least in trade-offs between rural livelihoods and poverty alleviation. There are examples of "success stories" on sustainable decriminalized charcoal policies to be consulted.
5. In general, the project assumes a high risk profile by approaching the charcoal policy field as its complex cross-sectorial properties will be a demanding challenge to address with high risks of failure.
6. We recommend expanding the time frame of the programme as the 2 years suggested in the PD is too short relative to ambitions and suggested outcomes.

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Annex 1 – Terms of Reference

Terms of reference: Appraisal of the Programme Document:

Illegal Timber Trade and REDD+ interface In Eastern Africa : A pilot

Background

“Illegal timber, international trade and national deforestation: enhancing awareness and capacities in East Africa” is a project in response to illegal timber trade in East Africa, constituting a major driver of deforestation Tanzania, Kenya and Uganda. These countries are suffering heavily from illegal logging, as described by reports from TRAFFIC (2007) and Chinese Takeaway (2004) showing significant discrepancy between reported imports versus reported exports. These three countries have contributed to an approximate 14.4 million hectares of deforestation from 1990 to 2010. The three countries are connected to each other through timber trade, as source, transit or exit countries. Further, the two largest ports in East Africa are found in Kenya and Tanzania, which are key exit points for illegal timber to international markets.

The initiative aims for the following four results:

Awareness and knowledge raised among stakeholders on the magnitude of, and options to address, illegal timber trade in East Africa

Enhanced national law enforcement, judiciary and prosecution capacities to combat illegal timber trade combined with establishment and support to the implementation of container profiling units for timber in East Africa.

Key areas to strengthen the institutional and regulatory framework for sustainable timber production and trade are identified

The regional initiative on illegal timber trade is well managed, serves to raise the issue politically among national governments and sets a model to replicate in other regions.

The initiative will be implemented jointly by the UN-REDD agencies (UNDP, UNEP and FAO), UNODC and Interpol (referred to as the five implementing agencies). All five agencies are currently engaged in combating organized illegal logging and wildlife crime, and receive support from Norway through 1) The UN-REDD Programme, 2) UNODC’s project ORGFORC (with RRU-Grid Arendal), and 3) INTERPOL’s project LEAF (with RRU-Grid Arendal).

The five implementing agencies fight illegal timber trade in different ways. **The UN-REDD agencies** assist UN-REDD partner countries to support readiness activities. It specifically provides support toward transparent governance systems, clearer tenure rights, poverty alleviation and improved food security, sustainable land use policies and management of forests. In East Africa, the UN-REDD Programme has been active in Tanzania since 2008, through a National Programme to enhance national capacities and governance for REDD+, with a budget of US\$ 4.3 million. The National Programme ended in 2013, with yet no specific plans to continue. In Kenya, the UN-REDD agencies

have been supporting the government with legal and governance assessments for REDD+, in which forest governance and illegal timber trade constitute central elements. Uganda is a UN-REDD Partner Country, and expects to submit an application to receive funding for a National Programme in 2014. Relevant is also FAO's global initiative on FLEGT, which has started initial activities in the three countries. None of them, however, have initiated negotiations with the EU on VPA (Voluntary Partnership Agreement). UNEP has also been involved in both ORGFORC and Project Leaf.

UNODC is a global player in the fight against illicit drugs and organized crime under the framework of the United Nations Convention against Transnational Organized Crime (UNTOC) and the United Nations Convention against Corruption (UNCAC), and focuses on strengthening the capacity of governments to investigate, prosecute and adjudicate crimes against protected species of wild flora and fauna. Through this proposal, UNODC will support the establishment of container profiling units for timber in Mombasa, Kampal and Dar es Salaam. At the moment, UNODC has set up 30 operation port control units in 17 countries, which have experienced an increase in inspected containers and seizures. In particular, port control units in Togo, Ghana, Pakistan and Ecuador had positive seizure results in 2012. These results will be replicated in the newly established ports in Kenya and Tanzania.

INTERPOL supports and coordinates several cross-border law enforcement operations and develops training programmes to strengthen forest law enforcement across each of its 190 member countries. INTERPOL is the only international police agency with a trans-boundary mandate and a designated unit on environmental crime. INTERPOL has the largest dedicated structure under one programme to address environmental crime issues from a global perspective. INTERPOL's role in this project will focus principally on supporting law enforcement operations through both direct technical and financial support and indirectly through training of enforcement officers.

This programme is to be an ongoing cycle of supporting law enforcement operations, assessment, and developing training. In addition to the five implementing agencies, the **governance structure** and management of the funds entail 2 additional international bodies: the MPTF and the UN-REDD Secretariat. As a result of this multiplicity of institutions, countries and stakeholders involved, a 3-tier management arrangement is proposed: a Steering Committee, a Regional Task Force and a Project Team.

The UN-REDD's lead agency for this initiative is FAO and as such will be responsible for the overall coordination, management and reporting. UNDP and UNEP will provide their targeted inputs as specified above and all three agencies will collaborate as per the UN-REDD modus operandi through the UN-REDD Programme's Management Group. At a national level, the UN-REDD agencies will work through institutions and focal points. UNODC will work with its traditional partners and a mechanism for in-country coordination of efforts will be designed for each country individually. At the national level, each of INTERPOL's 190 member countries have an assigned National Central Bureau (NCB), linking national police with INTERPOL's global network. The NCB in each country provides the formal link and approved mandate to the INTERPOL General Secretariat in Lyon.

Purpose

The purpose of this consultancy is to produce an external appraisal of the project design, which Norad will use to provide immediate feedback to the implementing agencies and ultimately for Norad to make a funding decision.

The assessment should in specific check whether the information in the Programme Document is sufficient, identify, if any, additional information needed (guided by the list of priority issues), and provide advice on potential improvements that will contribute to good project design.

The assessment should among others address the relevance of project in reaching the objective, the efficiency and cost-effectiveness of the project, assess the project's management set-up (especially how the implementing agencies will work together), funding modalities, quality of the results framework and risks.

Scope of work

Meet with Norad after contract signature to discuss the assignment

Conduct a desk review based on the relevant literature referenced in this TOR

Coordinate the drafting of the appraisal report, and share a draft with Norad as elaborated under chapter 5.

Address comments from Norad and submit the final appraisal report according to the agreed delivery date

Priority issues to be reflected in the assessment

The following includes a list of relevant questions and issues to be reflected in the report. This list is not exhaustive.

Assessment of the Partners' planning process

The degree to which the project developers have identified relevant stakeholders in all three countries, and how these have influenced the project design. Of specific relevance is whether vulnerable groups¹³, civil society and the private sector have been involved. The UN-REDD Programmes Handbook for National Programmes includes guidelines for how the preparation of UN-REDD National Programmes should be conducted, although not directly applicable for this project, the Handbook does reference the need for an inclusive approach in the planning process.

The level of ownership demonstrated by the implementing organizations as well as the three Governments. Which relevant government institutions are involved? At what institutional level within the Governments is support to the project expressed? Where is responsibility anchored?

The severity of illegal timber trade, and how the project will address corruption in law enforcement throughout the value chain.

Does the Programme Document present institutional capacity gaps, within each of the responsible government institution, and a strategy for filling the gaps? Such capacity gaps could relate to human resources, management structures and institutional and legal frameworks.

How does the Programme Document use lessons learnt from other projects fighting forest crime, illegal timber trade (such as UNODC's container programme ORGFORC and project LEAF), implementation of other UN-REDD funded projects (such as the national UN-REDD programme in Tanzania) or similar thematic projects.

Does the project present a clear management model? Are key institutions represented in the governance structure of the project? Key challenges to consider are the geographical spread of project activities and staff across three countries, the inclusion of five implementing agencies with different implementing modalities and management structures (modalities: presence at site, ability to transfer funds to partners, administration of expenditures, decision making authority at site), and previous cooperation between the implementing agencies.

¹³ For definition of vulnerable groups, see the SEPC

http://www.unredd.net/index.php?option=com_docman&task=doc_download&gid=6985&Itemid=53

How the Programme has aligned its objective and implementation with other relevant projects, initiatives and partners involved with REDD+ and sustainable forest management, and in particular with fighting forest crime and illegal timber trade in East Africa – parties that are likely to influence the project's results chain. Of specific relevance are past and ongoing UN-REDD activities, projects funded by Norad such as ORGFORC and LEAF, as well as projects under the EU's FLEGT.

Assessment of the project design

Are relevant risk factors identified and analysed, and are mitigating actions integrated in the project design? Does the project present an acceptable procedure of how the risks analysis will be continuously updated?

Do the selected responsible units/departments within the UN-REDD agencies, UNODC and Interpol possess the technical skills, competency and capacity needed to implement the project?

Is there a clear project management set-up, with coordinating mechanisms and lines of responsibilities? What about internal coordination among the five project developers; do they harmonize their implementation such that the burden on the Government is minor (in accordance with the UN Delivering as One principles and Paris Declaration)?

Are the lines of accountability clear, i.e. both in terms of fiduciary responsibilities as well as programmatic responsibilities?

Does the project present enough staff capacity to conduct Monitoring and Evaluation?

Do the five implementing agencies present a sufficient team of qualified technical and administrative staff that will be dedicated to implement the project?

Do the project developers introduce quality assurance and quality control mechanisms, such that activities are designed and approved by technical experts before conducted?

Assessment of sustainability and risks

Policy and framework conditions (incl. corruption).

How does the project align itself with existing relevant strategies for fighting illegal logging and illegal timber trade within the three countries? How will the project address anti-corruption measures, among others through the use of preventive measures (such as following principles of participation, transparency and accountability)? If yes, how will the project be aligned with and preferably strengthen existing anti-corruption strategies endorsed by the Governments?

Socio-economic and gender aspects

How will the project affect vulnerable groups involved in logging and timber trade, and which measures has the project introduced to ensure that vulnerable groups are better off?

How will the project address gender equality?

Economic and financial aspects

Does the project include co-financing from other partners, including the Governments of Tanzania, Uganda and Kenya? If co-financing, also in-kind support, will be made available, is it clear how such support will be made available for the project?

Does the project present a cost-efficient and effective use of resources compared to cost norms² and similar projects?

Institutional and organizational aspects

Will the Governments make relevant government staff available for the project activities, and do these staff have assigned responsibilities as defined by Government strategies/plans?

Is there a clear integration of project activities within the Government's ongoing work, or do they run in parallel?

Methodology and Implementation of the appraisal

Source of information and methodology to be applied

The selected consultants will undertake the assignment through a desk study.

Suggested literature relevant for the desk study (but not an exhaustive list):

Programme Document

Programme Documents, Decision Documents and 2014 Work Plans for ORGFORC and LEAF

[UN-REDD Programme Strategy 2011-2015](#)

Tanzanian REDD+ Strategy

Kenya REDD+ Governance Project

Uganda REDD+ Readiness Plan

Public Expenditure Reviews from the World Bank or UN HACT Macro Assessments

Relevant FLEGT documents

Evaluation of the UN-REDD National Programme in Tanzania

UN-REDD Global Programme SNA Monitoring Framework

Support letters from the Governments of Kenya, Tanzania and Uganda

Norad will make all documents available for the selected consultants upon recruitment.

Suggested list of interviewees:

Representatives from the UN-REDD Secretariat, UNDP, UNEP, FAO, Interpol and UNODC

Relevant representatives from the Governments of Tanzania, Kenya and Uganda

The Norwegian Embassies in Dar es Salaam and Nairobi

Relevant representatives from Norad and KLD

Other donors, like the World Bank, and bilateral partners actively supporting programmes fighting illegal logging and trade in East Africa;

Other partners and stakeholders, e.g. FLEGT (EFI), representatives from both national NGOs and relevant international NGOs.

Team composition and leadership

The selected consultants shall consist of a team of two external persons with documented expertise on:

Development cooperation programming, especially with multi-lateral organizations;

Organizational and project management;

Knowledge at a strategic level of the relevant sectors, especially forestry and preferably illegal timber trade;

Competence in law and enforcement, preferably in the field of illicit wildlife and timber trade;

Governance and anti-corruption;

Economic and financial assessment, risk management;

One of the consultants will be team leader, and responsible for coordinating the drafting of the final report. The team leader will also be the focal point in communication with Norad. The team leader is expected to coordinate weekly with Norad's focal point in the Department for Climate, Energy and Environment. At least one team member should have detailed understanding of the political economy of one or more of the target countries.

Timetable for preparation and field work

Schedule and tentative time frame:

The work is expected to take about 15 days per person.

A draft report shall be presented to Norad tentatively by 15 June 2014. Norad then has 10 working days to provide their comments to the draft report. The team shall address these comments and deliver the final report within 5 working days.

Deliverables

Research framework and Gantt chart. To be delivered 5 working days after contract signature.

Draft report. The report shall be written in English, and not exceed 20 pages excluding relevant annexes, and should contain a summary with the main findings, main conclusions and recommendations. In order for the project to be established as soon as possible, the recommendations should include a list of immediate improvements that must be addressed before project start, in addition to a list of medium term improvements to be completed in the inception phase (say after 3 months of operation).

A tentative outline as follows:

Executive summary including main findings, conclusions and recommendations (max 5 pages)

Introduction

Methodology

Findings

a. Assessment of the Partners' planning process b. Assessment of the project design c. Assessment of sustainability and risks

Policy and framework conditions (incl. corruption).

Socio-economic and gender aspects *iii.* Economic and financial aspects

Institutional and organizational aspects

Environmental risks

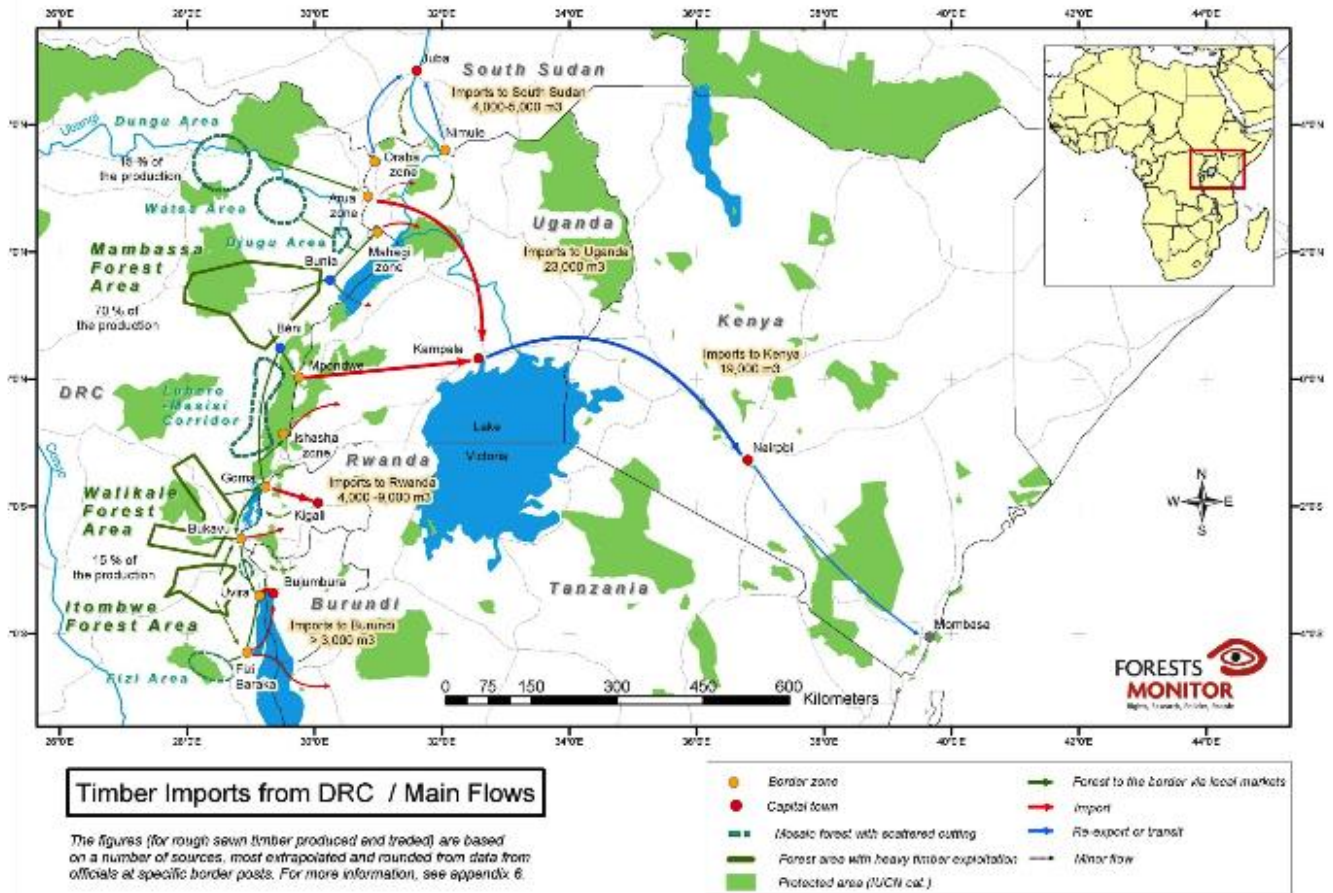
Conclusions and recommendations

Referenced literature

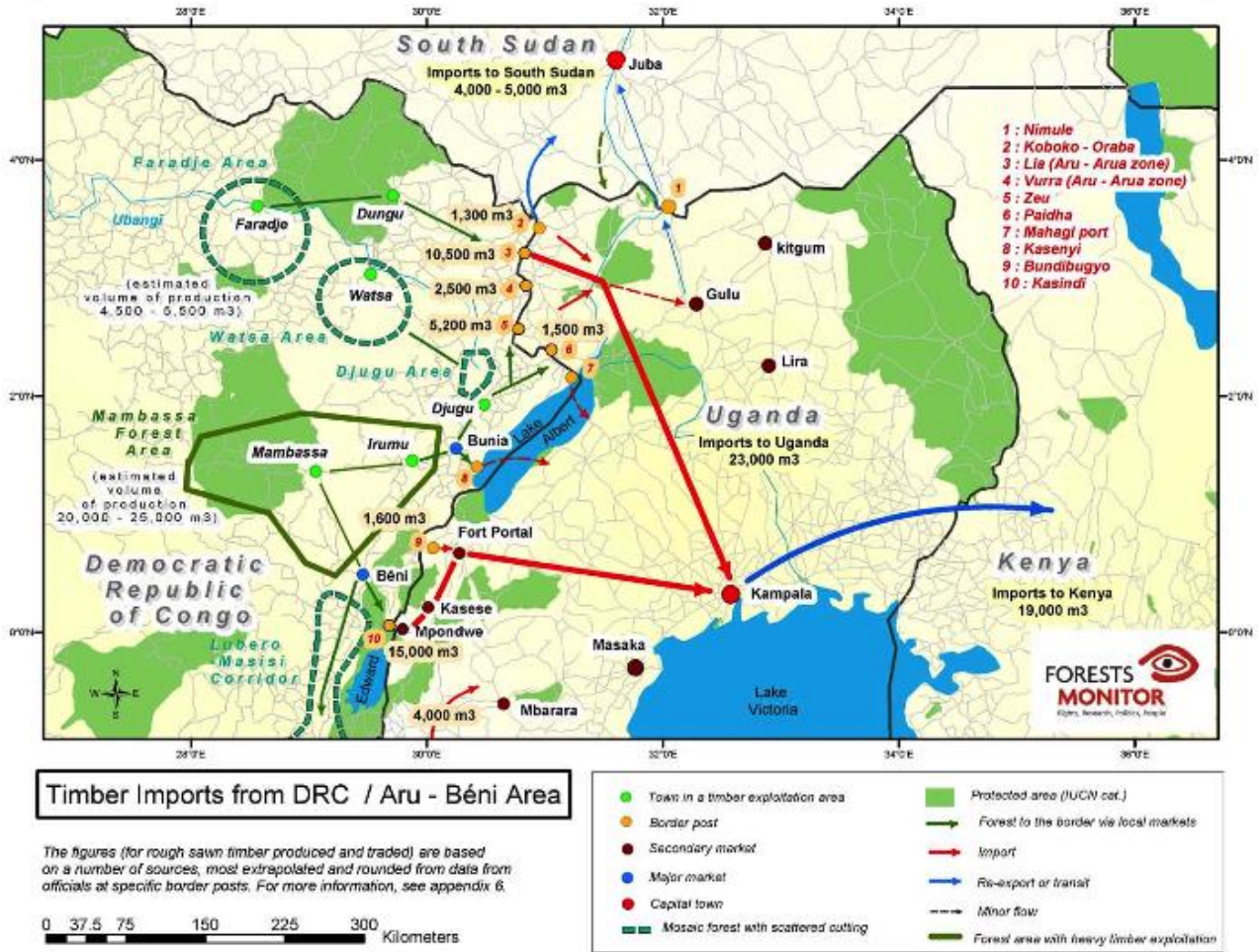
Annexes

Final report.

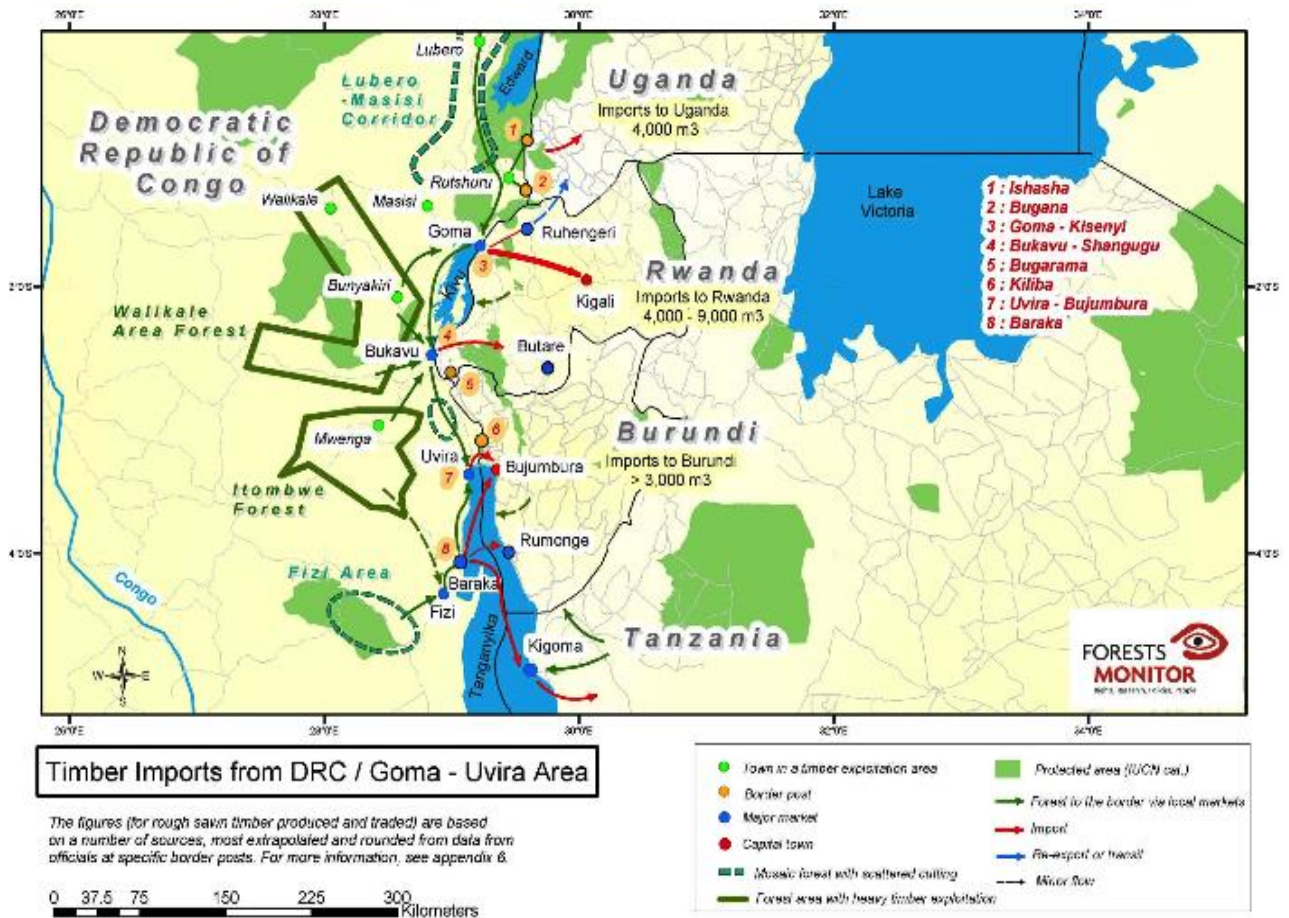
Annex 2 – Illegal Timber Flows in East Africa/Upper Great Lakes Region



Annex 3 – Flows of Illicit Timber from the Aru-Beni Area



Annex 4 – Flows of Illicit Timber from the Goma-Uvira Area



Annex 5 – Interview Schedule

Questions

- 1) **What is the National ownership to programme**
 - a. **Who has participated in planning and with what?**
 - b. **Who will participate in operations**

- 2) **Clarification of rationale**
 - a. Why is both ITT and charcoal included: convenience sampling or?
 - b. What are arguments behind the three countries selected?
 - c. Will the container profiling address the key issues of illegal trade?
 - d. Have you used any TO-change for addressing the key issues?
 - e. Clarify the regional ambition of the programme
 - f. If this is a novel pilot and demonstration scheme; what are the key new, novel, innovative issues and that can be replicated? More description and confer with other regional initiatives on illegal timber trade

- 3) **THE PD document**
 - a. Unclear on planning processes; who have been in and how involved, how work together between donor and with national authorities
 - b. Need a revised PD? Improve LFA (ask concrete). Add an organogramme describing in more detail authority and resources, rights, responsibilities etc..
 - c. Describe better pilot and demonstration plans and activities
 - d. And secure clearer monitoring and evaluation criteria for both programme activities and outcomes?
 - e. **Financial issues**; Disbursement of funds. Reporting responsibilities, how organized and who gives green light for funds to be disbursed – SC? More detailed budgeting.
Administrative costs: How high are they in reality? What are the indirect administrative costs and what are the direct administrative costs then? From the budget it is impossible to assess whether there are any ‘hidden’ administrative costs in the other outcome areas?
Future setup: Administrative and financial? How streamlined with REDD+/Climate funds?
 - f. **Inception phase**: Ask them to detail rationale, phasing and contents.
 - g. **Clearer on partners Role of partners**: UNDP vs. UNEP. Interpol vs. UNODC?
 - h. **Clearer on donor funding (including Norwegian)**

- 4) **Sustainability and risks**
 - A) There is a conspicuous lack of involvement and support from national bodies, which threatens programme and project sustainability
 - B) A plan for future programmes and for transfer of responsibility?
 - C) The potential added benefits of a joint regional programme versus individual project components should be spelt out ?

- D) Corruption measures are not well dealt with in the presented PD, especially in relation to corruption involving law enforcement or natural resource management officials.
- E) Pilot activities are extremely expensive and little is done to suggest measures of cost-saving by including other actors or through cost recovery activities
- F) If policies include alienating vulnerable groups (such as the Batwa, Ogiek, or other forest-dwelling indigenous people) from forest access, this can become a major challenge for programme sustainability and legitimacy.
- G) Environmental sustainability is a challenge for the programme; not least if charcoal activities are to be addressed. Banning and controlling illegal timber trade may be more possible to contain.
- H) The time frame of the programme is too short relative to ambitions and suggested outcomes and there seems to be some underlying ambitions of several phases of the programme. These should be more clearly spelt out in the PD.

Annex 6 – Sustainability and Risk Matrix

Project component	Policy support measures	Economic and financial	Human rights & equity	Environmental aspects	Socio-cultural gender	Institutional organisational	Overall
Awareness knowledge raising							
Enhanced law enforcement							
Inst. & regulatory framework							
Regional initiative well managed							

We suggest a matrix like this, where the various component are scrutinized on sustainability and risk dimensions. One must also look the distinction between illegal charcoal and timber challenges that in many ways demand different planning, policy and implementation approaches. There is also a difference between project sustainability and development activity sustainability itself.

Annex 7 – List of persons interviewed		
Name & Surname	Institution & Country	Phone Email address
Mr. Evarist Nderinyanga Nashanda	UN REDD Focal Point Tanzania On mission in Bonn.	evarest.nashanda@gmail.com 31973666646
Mr Gideon Anyimike Mwakalinga	Focal point for FLEGT Tanzania	+ 255 762509090 agmwakalinga@hotmail.com
Mr Edgar Masunga	Director of Planning, TFS	+255 754 826823 +255 652 594720
Mr Mugumya, Nyindo Xavier:	UN REDD Focal Point in Uganda and national Forest Authority	xavierm1962@gmail.com +256712408396
Mr Bob Kazungu:+256 782712196	Officer of the Forestry Sector Support Department Ministry of Water and Environment (REDD + Secretariat for FLEGT)	bob.kazungu@mwe.go.ug ; bob.kazungu@gmail.com
Rachel Musoke	Commissioner Wildlife Conservation, Ministry of Tourism, Wildlife and Antiquities,	Mob: +256 772 489308, Email: rachelmusoke@gmail.com / jlutalo@tourism.go.ug
Margaret Adata	Forestry Sector Support Department	+256 772 540 379 adatamargaret@yahoo.co.uk
Mr. Esau Omollo-	Kenya Forest Service	Ogingabig@yahoo.com
Robert Simpson (FOE)	FAO Forestry (Rome)	Robert.simpson@fao.org
Mirey Atallah	UN REDD (Geneva) Koordinator for prosjektet i Sekretariatet	Mirey.Atallah@un-redd.org + 41 22 917 8558
Volha Kuzmianok	UNODC (Vienna)	volha.kuzmianok@unodc.org
Athanase Buregeya	Interpol (Nairobi)	A.BUREGEYA@interpol.int
Ivar Jørgensen	KEM	23 98 00 94 ivar.jorgensen@norad.no
Lise Stensrud	STRATEG Ambassaderåd i Dar es Salam inntil mai 2014	Lise.Stensrud@norad.no 23 98 01 84
Berit Tvette:	Dev. Counsellor RNE Dar	E-post: bkt@mfa.no Telefon:+4723951541 Telefon, privat:+255782777023

Cindy Robles	SIVSA Saksbehandler støtte til LEAF, ORGFORC	23 98 01 42 Cindy.Patricia.Robles@norad.no
Rannveig Formo	NICFI Saksbehandler støtte til UN-REDD og ulovlig hogst	40 88 04 36
Morten Nordskog	NICFI Saksbehandler støtte til UN-REDD, UNODC, Interpol	22 24 57 19
Thomas Ball	Royal Norwegian Embassy in Nairobi	IP phone: +47 23957611
Leif John Fosse	(EFI) -	leif-john.fosse@efi.int
Dr. Christian Nellesmann	Senior Officer, Rapid Response Unit GRID Arendal - UNEP	Phone (Mobile): +4793466713 christian.nellesmann@grida.no
Yassin Mkwizu	Royal Norwegian Embassy in Dar	25523955664