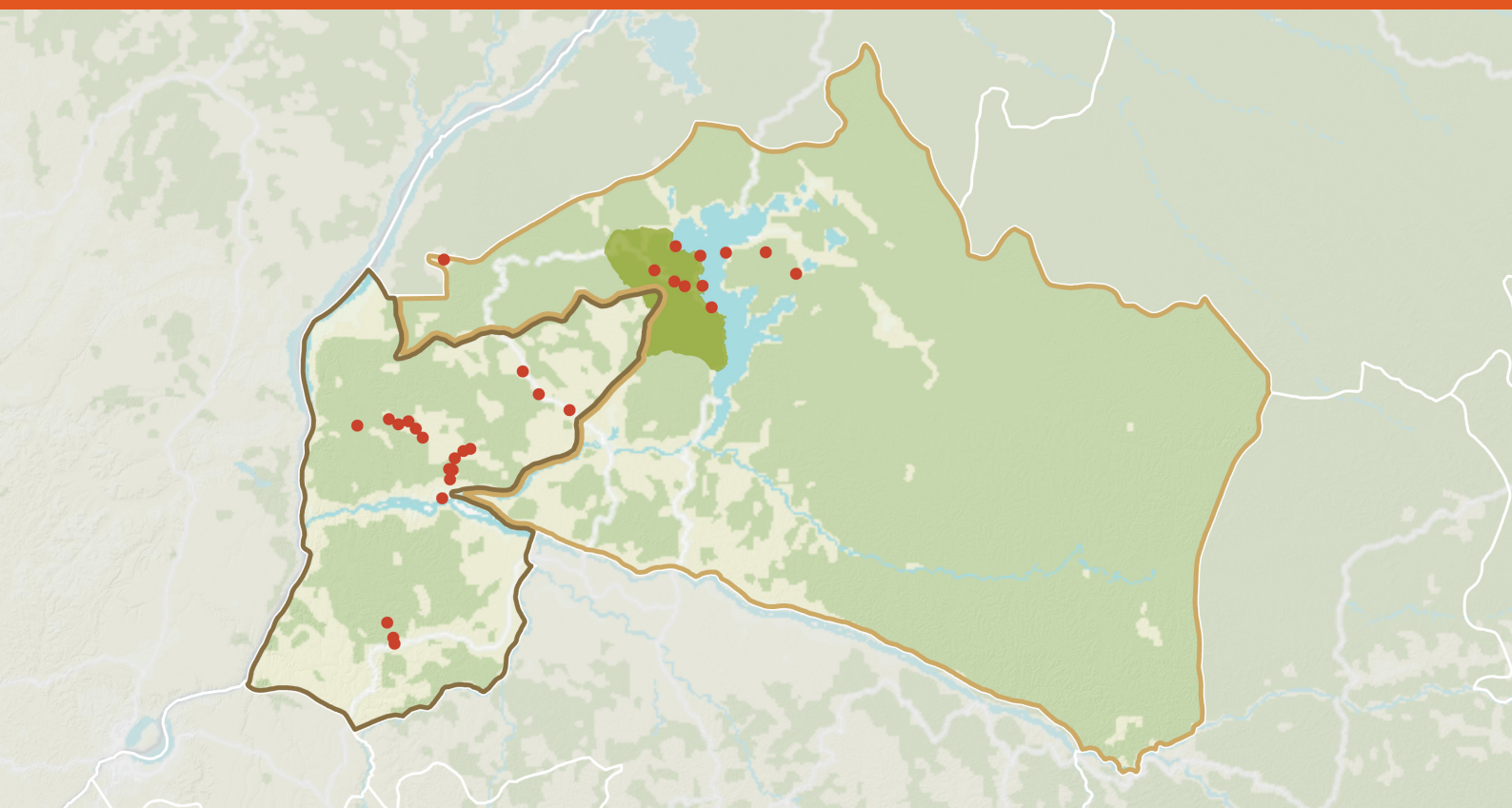


# REDD-MINUS: The Rhetoric and Reality of the Mai Ndombe REDD+ Programme

Norah Berk  
Prince Lungungu

December 2020



**RAINFOREST**  
**FOUNDATION UK**  
SECURING LANDS, SUSTAINING LIVES

## ACKNOWLEDGEMENTS

A big thank you to the Bolukiluki observers whose resolute efforts to document the perspectives of Indigenous Peoples and local communities in Mai Ndombe province have made this briefing possible. Thanks also to Joe Eisen for his inputs and to Elin Roberts for the GIS analysis and design. Finally, a big thank you to the communities for participating in this study.

---

# CONTENTS

<b>ACKNOWLEDGEMENTS</b>	<b>II</b>
<b>LIST OF TERMS</b>	<b>IV</b>
<b>SUMMARY</b>	<b>1</b>
<b>INTRODUCTION</b>	<b>3</b>
REDD+ the theory	3
Criticisms of REDD+	3
Bolukluki methodology	4
<b>THE MAI NDOMBE REDD+ PROGRAMME</b>	<b>5</b>
<b>PIREDD PLATEAU</b>	<b>8</b>
Free, prior and informed consent	9
Local development committees	10
Natural resource management plans	10
Benefit distribution	11
Burnings of savannahs (bushfires)	12
Grievance mechanism	13
<b>WILDLIFE WORKS CARBON CONCESSION, PIREDD MAI NDOMBE</b>	<b>15</b>
Free, prior and informed consent	17
Land rights and land use in the concession	17
Local development committees	17
Benefit distribution	17
Inter-communal conflict	19
Obstruction of research	19
Grievance mechanism	19
<b>CONCLUSION</b>	<b>20</b>
<b>RECOMMENDATIONS</b>	<b>20</b>
Recommendations for REDD+ project implementers	20
Recommendations for the Congolese government	20
Recommendations for civil society	21
Recommendations for donors	21

## LIST OF TERMS

<b>APEM</b>	Action pour la Promotion et Protection des Peuples et Espèces Menacées
<b>BSP</b>	Benefit-sharing plan
<b>CAFI</b>	Central African Forests Initiative
<b>CARG</b>	Agriculture and Rural Management Councils
<b>CLD</b>	Local Development Committee
<b>DRC</b>	Democratic Republic of Congo
<b>ERPA</b>	Emission Reduction Payment Agreement
<b>FCPF</b>	Forest Carbon Partnership Facility
<b>FIP</b>	Forest Investment Programme
<b>FPIC</b>	Free, prior and informed consent
<b>FRMi</b>	Forêt Ressources Management Ingénierie
<b>GCF</b>	Green Climate Fund
<b>GTCRR</b>	Group de Travail Climat REDD+ Renouvé
<b>LICOCO</b>	Ligue Congolaise de Lutte Contre la Corruption
<b>MEDD</b>	Ministry of Environment and Sustainable Development
<b>MRV</b>	Measurement, Reporting and Verification
<b>NRMP</b>	Natural Resource Management Plan
<b>PIREDD Mai Ndombe</b>	Integrated REDD+ project of Mai Ndombe
<b>PIREDD Plateau</b>	Integrated REDD+ Plateau project
<b>REDD+</b>	Reducing Emissions from Deforestation and Degradation
<b>RFUK</b>	Rainforest Foundation UK
<b>RRI</b>	Rights and Resources Initiative
<b>UC-PIF</b>	National FIP Coordination Unit
<b>VCS</b>	Verified Carbon Standard
<b>WWC</b>	Wildlife Works Carbon
<b>WWF</b>	World Wide Fund for Nature

# SUMMARY

REDD+ is often positioned as the primary means of reducing deforestation and degradation while promoting sustainable development in tropical forest countries. Over the past 13 years, hundreds of millions of dollars of international climate funding has been poured into REDD+ programmes that aim to reduce forest loss by changing the farming and land use practices of forest communities. Yet there remains little information on the social impacts of these efforts, particularly in Africa's Congo Basin region.

In order to fill this gap, the Congolese organisation Action pour la Promotion et Protection des Peuples et Espèces Menacées (APEM) in partnership with the Rainforest Foundation UK (RFUK) supported a grassroots research initiative in Mai Ndombe province in the Democratic Republic of Congo (DRC), home to one of the world's most advanced jurisdictional REDD+ programmes. Entitled Bolukiluki ('to search' in Lingala), the system is administered by civil society representatives who are trained to conduct individual interviews, village meetings and focus groups on local perceptions of consultation, benefit sharing, treatment of land rights and other REDD+ safeguards. Over the course of two years, the teams surveyed over 400 individuals in 26 villages inside two of the province's highest profile projects: Integrated REDD+ Plateau Project (PIREDD Plateau) managed by the World Wide fund for Nature (WWF) and the private Wildlife Works Carbon (WWC) REDD+

concession.

The *findings* from Mai Ndombe, typically touted as a success story with "promising results",<sup>1</sup> show it is falling well below expectations, including that:

- The projects **did not obtain the free, prior and informed consent** of local communities for REDD+ activities, leading to confusion and conflict in the project areas.
- There is a shockingly **low level of inclusion and ownership** in communities supposed to be implementing REDD+ activities, particularly among women.
- Many of the **promised benefits have either still not been delivered** or communities are dissatisfied with their implementation.
- Local Development Committees set up to interface with the projects **do not properly represent communities**, their members are not sufficiently informed of what REDD+ is, and often lack the necessary resources to implement REDD+ activities.
- There is **insufficient effort to clarify and strengthen the tenure security** of local communities, leaving them vulnerable to land speculation and migration.
- Natural resource management plans in PIREDD Plateau **do not adequately represent the traditional land use systems** of



<sup>1</sup> DRC: REDD+ shows very promising results in Mai-Ndombe after first year (World Wide Fund for Nature, 2017).

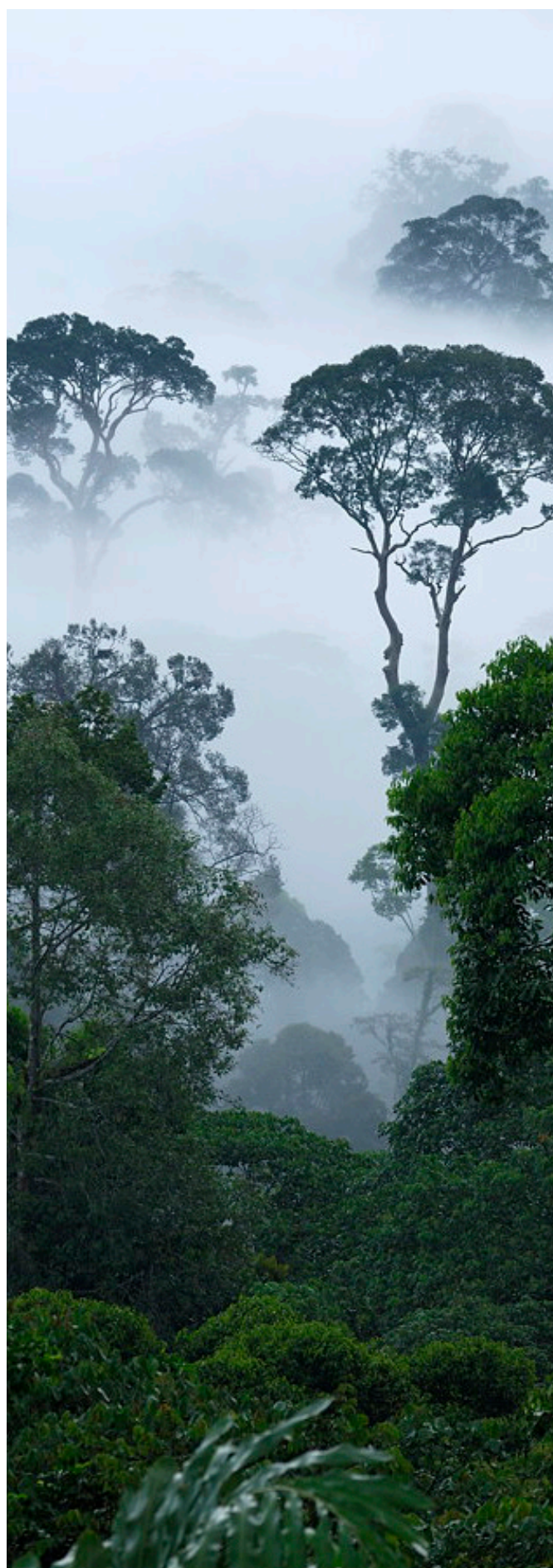


communities and have led to disputes over land boundaries, cut off women's livelihoods and caused food scarcity in certain villages.

- The **absence of functioning grievance mechanisms** for the two projects mean communities have little way of obtaining remedy for these kinds of issues.
- Local government **capacity to oversee the jurisdictional REDD+ programme** is still very lacking despite years of so-called 'REDD readiness' activities.
- The interventions also appear to have **little impact on reducing deforestation and degradation**, and in some cases even catalysed forest loss.

Among the *recommendations* for the project implementers, the Congolese government and its international partners are that there should be:

- A detailed **study into the direct and indirect drivers of deforestation** to ensure appropriate policy prescriptions and interventions.
- Much greater emphasis on **clarifying and securing collective land tenure** through community forests and participatory land use planning so that communities are better able to defend their interests and directly benefit from climate-friendly livelihoods.
- A **review of the REDD+ governance structure** in Mai Ndombe including the appropriateness of Local Development Committees to represent community needs.
- Greater **transparency** from project implementers, such as publishing budgets and reports showing the proportion of funds dedicated to community activities.
- A **revision of the advanced benefit sharing plan** to devote much greater benefits to local communities, including non-carbon benefits, as a condition of effectiveness for the 55 million USD Emission Reduction Payment Agreement between the Forest Carbon Partnership Facility and the Congolese government.
- Reinforcement of **independent monitoring and accessible grievance mechanisms** to ensure better accountability and oversight of REDD+ activities.
- A **cost-benefit impact assessment of REDD+** in DRC over the past decade.



# INTRODUCTION

## REDD+ THE THEORY

Reducing Emissions from Deforestation and Degradation, or REDD+<sup>2</sup>, is primarily a market-based mechanism that seeks to make trees more profitable left standing than when cut down. In general terms, REDD+ works as follows: a REDD+ programme or project predicts how much deforestation will occur in an area based on historical rates of deforestation or by using neighbouring areas as proxies. The predicted rate of deforestation is called a baseline, or a forest reference emission level, and prescribes how many tons of carbon dioxide would be emitted under a business-as-usual scenario (without introducing a REDD+ programme or project). REDD+ activities are then implemented to prevent or reduce the drivers of deforestation, often identified as shifting agriculture and wood fuel collection. The level of deforestation in the project area is compared to the baseline scenario and depending on how much deforestation was avoided, a certain number of carbon credits are allocated (typically one carbon credit represents one ton of carbon dioxide). Tropical countries with REDD+ programmes are rewarded through results-based payments for the number of emission reductions generated or REDD+ project implementers are allotted a certain number of REDD+ carbon credits they can sell or use as offsets.

This process is intended to drive social benefits through improved 'forest friendly' livelihoods (including from carbon payments), clarification of land tenure, and stronger governance of forests arising from 'REDD readiness' activities. Projects are also required to apply national and international safeguards to minimize social risks from emission reduction activities.<sup>3</sup>

## CRITICISMS OF REDD+

REDD+ has proven far harder to implement than was first envisaged thirteen years ago due to several reasons. First, there are huge uncertainties in calculating emission reductions from REDD+ projects that can lead to the production of 'hot air' credits and fraud.<sup>4</sup> Baselines often **inflate the level of deforestation** by including years when deforestation levels were highest<sup>5</sup> or using areas with high deforestation rates as proxies.<sup>6</sup> The lack of clear carbon accounting systems can lead to **double-counting** carbon credits, when more than one project or country counts the same credit towards their emission reductions.<sup>7</sup> There can also be challenges in demonstrating the **additionality** of REDD+ activities versus other ecological, political or economic factors that may affect forest cover. Even if additionality is demonstrated, '**leakage**' can occur where deforestation prevented in one area is simply displaced to another. Finally, there are no guarantees that any emission reductions generated will be **permanent** beyond the lifespan of the project and that no natural disasters, fluctuations in the economy, or changes in population, for example, will occur over the next century.<sup>8</sup> Efforts to address these kinds of issues have led to convoluted carbon accounting systems whose regulations are still not finalised at the international level.<sup>9</sup>

Second, REDD+ allows polluting companies in the global north to notionally offset their emissions by **targeting the land use practices of the rural people** least responsible for the climate crisis. The current typical price of 5 USD for a REDD+ credit will likely provide a greater incentive for a poor farmer than it would for a logging or palm oil company to change land use practices.<sup>10</sup> Yet even

---

<sup>2</sup> The full title of "REDD+" stands for reduce deforestation and degradation and the role of conservation, sustainable management of forests and enhancement of forest carbon stocks.

<sup>3</sup> See, for example, the 'Cancun Safeguards' agreed at COP16.

<sup>4</sup> Ryan Jacobs, *The Forest Mafia: How Scammers Steal Millions Through Carbon Markets* (The Atlantic, 2013).

<sup>5</sup> For example Brazil's forest reference emission level is based on the average level of deforestation between the years 1996 to 2010 when deforestation was at its very peak at 19,000 km<sup>2</sup> per year. In 2019, deforestation in Brazil increased under the Bolsonaro regime to 9,700 km<sup>2</sup> from 7,900 km<sup>2</sup> in 2018, yet their baseline still allowed the country to be rewarded for its efforts to reduce deforestation.

<sup>6</sup> The Wildlife Works Carbon concession in Mai Ndombe province in the Democratic Republic of Congo used the Mayombe Forest in the Bas Congo as its reference area. However, this area is not

comparable to the concession WWC inherited as it is already heavily deforested due to commercial logging operations by the company SOFORMA and its proximity to the capital, Kinshasa. For this reason, initial discussions on how to integrate WWC's project into Mai Ndombe's emission reduction programme, required lowering the project's baseline by 33 percent.

<sup>7</sup> *Who takes the credit? REDD+ in a post-2020 UN climate agreement* (FERN, 2015).

<sup>8</sup> Chris Lang, *REDD: An Introduction* (REDD-Monitor, 2011) <<https://redd-monitor.org/redd-an-introduction/>>.

<sup>9</sup> Rules on how countries can reduce their emissions using international carbon markets, covered under Article 6 of the Paris Agreement on climate change, are still to be finalised.

<sup>10</sup> This includes only the financial return as tropical forests also provide communities with food, livelihoods, and are intricately connected to their identity and culture.



this 5 USD does not reflect the transactional costs (e.g training, technical inputs, MRV) of generating the credits.<sup>11</sup>

Third, and related to the previous points, is the continuing **lack of a market for REDD+ credits**. More than a decade after the World Bank's Forest Carbon Partnership (FCPF) was established with aim of kickstarting a REDD+ carbon market, demand for REDD+ credits remains low. However, there is a recent surge in efforts to catalyse a market for carbon credits with the aviation industry setting up an offsetting scheme (CORSIA) and so-called nature-based solutions garnering international attention and funding. Furthermore, it is worth stating that carbon markets are themselves widely disputed as a viable solution to climate change.<sup>12</sup>

Fourth, and the main subject of this briefing, is the **impact of REDD+ activities on local forest communities**. On the one hand, REDD+ has provided a platform for discussing their role in forest conservation and has introduced requirements on Free Prior and Informed Consent (FPIC), benefit-sharing and land rights. On the other hand, national level reforms on these issues have been slower than expected and it is not always apparent how safeguards are applied in REDD+ projects. The discrepancy between the discourse at the international level and implementation on the ground is a symptom of a deep information gap between REDD+ policy makers and local communities on the ground.

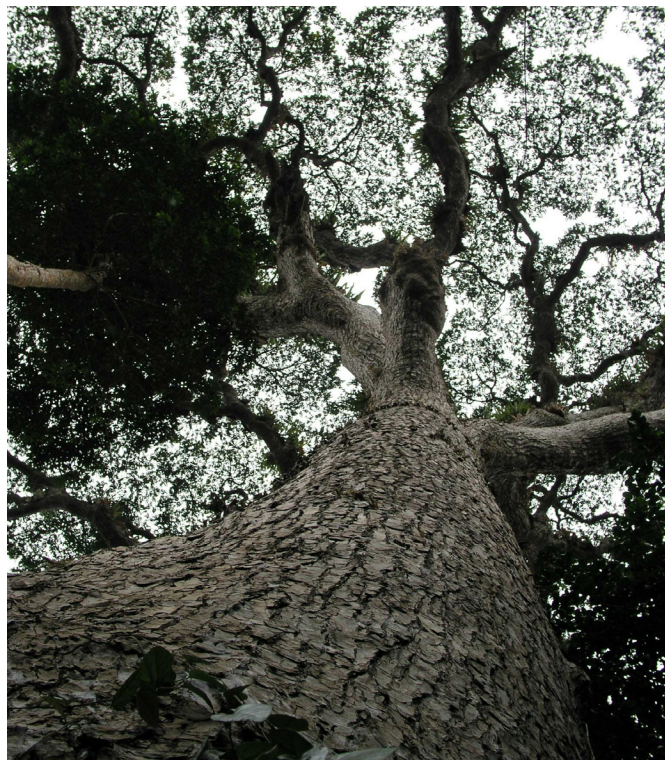
## BOLUKILUKI METHODOLOGY

Bolukiluki is a network of 13 civil society observers from Mai Ndombe and the neighbouring provinces of Equateur (Tshuapa), Kasai and former Orientale. The Bolukiluki observers collect and document the perspectives of local communities impacted by REDD+ programmes. From 2018-19, Bolukiluki observers undertook nine monitoring missions, each spanning two to four weeks, within the PIREDD Plateau and WWC concession. They visited 26 villages and surveyed more than 400 people. A cross-section of the community was interviewed in each village, including women, Indigenous Peoples, village elites, and members of Local

Development Committees, to ensure a diverse representation of views.

The surveys measured the level of consultation carried out by REDD+ project implementers, to what extent project activities focused on clarifying and improving collective land tenure, and perceptions of benefit sharing. This criterion is based on internationally recognised standards on REDD+ implementation, including the FCPF Carbon Fund Methodological Framework, the Cancun Agreements, UNFCCC safeguards, UN Declaration on the Rights of Indigenous Peoples, and the DRC national Forest Code.

The methodology comprises a set of tools housed on tablets to facilitate village meetings, focus groups with women or Indigenous Peoples, detailed individual interviews, incident reports to document any serious abuses, and a mission report to detail the overall situation in the communities. While village meetings, focus groups and mission reports are all largely qualitative, individual interviews provide quantitative data. The methodology enables Bolukiluki observers to triangulate information from multiple sources to ensure answers provide a genuine and verifiable account.<sup>13</sup>



<sup>11</sup> Nathaniel Dyer and Simon Counsell, *McRedd: How McKinsey Cost Curves are Distorting REDD* (Rainforest Foundation UK, 2010).

<sup>12</sup> Larry Lohmann, *Carbon Trading* (The Corner House, 2006).

<sup>13</sup> The methodology and questionnaires are available on request.



# THE MAI NDOMBE REDD+ PROGRAMME

Mai Ndombe in western DRC spans 12.3 million hectares (an area roughly the size of England), of which 9.8 million is forest. The province contains diverse ecosystems including agricultural and savannah land in the south, to forests with flooded and semi-flooded soils in the north.<sup>14</sup> The level of deforestation varies significantly throughout the province, being much higher in areas nearer to Kinshasa largely due to the supply of fuel wood to the capital. The population consists of Bantu and Indigenous Peoples and is estimated at anywhere between 1.8 and 2.9 million people, giving it a low population density. However, participatory mapping supported by RFUK and local partners indicates a system of clan-based customary land tenure and forest management that is likely to extend across much of the province.<sup>15</sup>

Mai Ndombe province was created during the subdivision of DRC's provinces in 2006 and the provincial government was established in 2015. REDD+ activities have been underway in the province since 2010 when Ecosystem Restoration Associates (ERA) applied for a REDD+ concession (later acquired by Wildlife Works Carbon).<sup>16</sup> REDD+ initiatives were originally conceived as stand-alone projects that could generate and

sell carbon credits based on their own policies and those of verification companies such as the Verified Carbon Standard (VCS), but were then grouped under a jurisdictional programme to address 'leakage' and other issues.<sup>17 18</sup>

There are three main sources of institutional funds for the jurisdictional programme and the wider national REDD+ Investment Plan in DRC.

The World Bank's **Forest Investment Programme (FIP)** has a 60 million USD programme in DRC co-managed with the National FIP Coordination Unit (UC-PIF) of the Ministry of Environment and Sustainable Development (MEDD). Since 2014, the FIP has invested more than 14 million USD in the PIREDD Plateau project in the west of the province with WWF as the Local Implementing Agency. The programme aims to strengthen the capacity of local government and communities to implement REDD+ activities; to improve farming techniques and pilot results-based payments; and to develop local infrastructure projects.

In 2017, the World Bank received an additional 30 million USD from the **Central African Forest Initiative (CAFI)** to supplement activities in PIREDD Plateau and extend them to the



<sup>14</sup> Marine Gauthier, *Mai Ndombe: Will the REDD+ Laboratory Benefit Indigenous Peoples and Local Communities?* (Rights and Resources Initiative, 2018).

<sup>15</sup> REDD and Rights in DRC: The implications of community mapping for the Mai-Ndombe Integrated REDD programme (Rainforest Foundation UK, 2018) <[https://www.rainforestfoundationuk.org/media.ashx/redd-and-rights-in-drc->](https://www.rainforestfoundationuk.org/media.ashx/redd-and-rights-in-drc-).

<sup>16</sup> *The Mai Ndombe REDD+ project* (Wildlife Works Department of

Carbon Development, 2012).

<sup>17</sup> Frances Seymour, *INSIDER: 4 Reasons Why a Jurisdictional Approach for REDD+ Crediting is Superior to a Project-Based Approach* (World Resources Initiative, 2020).

<sup>18</sup> Jurisdictional programmes can sometimes exacerbate many of the problems they were meant to avert. For example, they can increase the likelihood of double-counting carbon credits, particularly when private REDD+ projects are active in the area.

## NATIONAL OWNERSHIP OF REDD+

A World Bank sponsored 'REDD Readiness' package was intended to strengthen national institutions and policies to implement REDD+. Yet a decade on government capacity on REDD+ remains limited<sup>19</sup> and there is a perception in DRC that it is an international programme. Key documents for Mai Ndombe are still drafted by international organisations and consultants rather than the Ministry of Environment and Sustainable Development (MEDD) notionally responsible for the programme. For example, the Congolese organisation LICOCO commented on the draft Emissions Reduction Programme Document stating:

*At first glance, LICOCO notes that the document is only in English. However, in the Democratic Republic of Congo, French is the official language. As a result, the draft will not be read and understood in the same way by all stakeholders, especially local communities, Indigenous Peoples and other members of civil society organisations.*

Civil society stakeholders often receive such documents late, or only in English, and are mostly excluded in substantive discussions about the programme. Interviews carried out with the local administrations and civil society organisations in Mai Ndombe also confirm limited understanding and ownership of REDD+ in the province.

remaining areas of the province that fall under PIREDD Mai Ndombe.<sup>20</sup> According to a World Bank document from 2018, a consortium of FRM Ingénierie (FRMi) and Wildlife Works Carbon (WWC) were designated as the Local Implementing Agency for PIREDD Mai Ndombe.”

21

The World Bank's **Forest Carbon Partnership Facility (FCPF)** aims to lay the foundations for a global carbon market for REDD+ credits via two funds. The Readiness Fund was designed to help countries set up the building blocks to implement REDD+ (national REDD+ strategies, reference emission levels, MRV systems, environmental and social safeguards, etc.). The Carbon Fund pilots results-based payments to countries that have advanced through REDD+ readiness and have achieved verifiable emission reductions in their forest and broader land-use sectors.<sup>22</sup>

In September 2018, DRC became the first country to sign an Emission Reduction Payment Agreement (ERPA) with the FCPF for the purchase of 55 million USD worth of credits from the Mai Ndombe REDD+ programme. The ERPA is

subject to six conditions of effectiveness, of which the finalisation of the programme's benefit-sharing plan is the last outstanding at the time of writing.<sup>23</sup> Many of the sub-projects in Mai Ndombe were documented in the Rights and

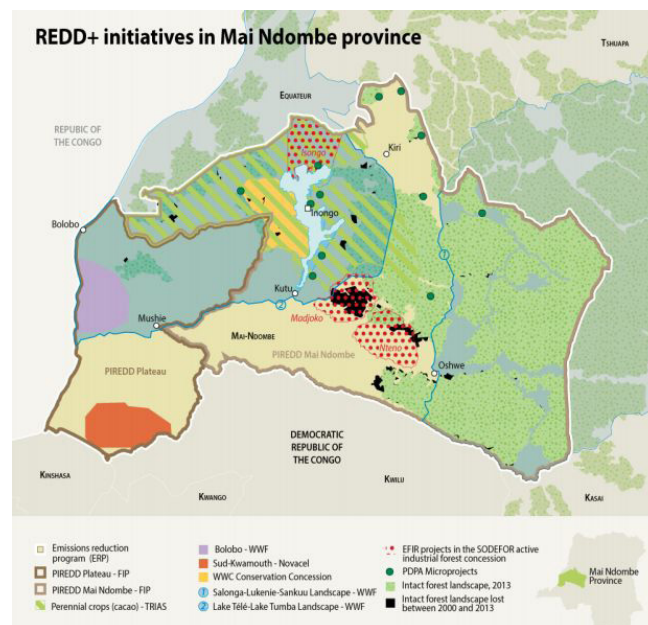


Image by Riccardo Pravettoni, courtesy of the Rights and Resources Initiative.

<sup>19</sup> Félicien Kengoum et.al., *The context of REDD+ in the Democratic Republic of Congo* (CIFOR, 2020).

<sup>20</sup> Laurent Valiergue, *Rapport annuel sur l'état d'avancement du programme REDD+ 1er Janvier - 31 Decembre 2018* (World Bank, 2018).

<sup>21</sup> Ibid.

<sup>22</sup> *About the FCPF* (Forest Carbon Partnership Facility, 2018), <<https://www.forestcarbonpartnership.org/about>>.

<sup>23</sup> *Emissions Reduction Payment Agreement Mai Ndombe Emission Reductions Program* (Carbon Fund of the Forest Carbon Partnership Facility, 2018).

## THE MAI NDOMBE BENEFIT SHARING PLAN

The benefit-sharing plan (BSP) is a vital element of the Mai Ndombe Emission Reductions Programme because it sets out what benefits local communities and other stakeholders are to derive from the 55 million USD agreement between DRC and the FCPF. As defined by the FCPF's guidelines, a BSP is a "document that elaborates on the Benefit Sharing Arrangements described [in the Emission Reduction Program Document], stakeholder consultation processes, and how the Program Entity will communicate, implement, and monitor the Benefit Sharing process."<sup>24</sup>

The BSP includes the payments awarded to beneficiaries for their efforts (monetary) and the goods or services required to implement activities, such as buildings, seedlings, and equipment (non-monetary). However, non-carbon benefits such as tenure security, which are arguably the most important to communities, do not have to be included in this or in the sub-project BSPs.

The process of drafting the BSP has been opaque and excluded local and national stakeholders from the outset. Despite an FCPF requirement that the BSP be "disclosed in a form, manner, and language understandable to the affected stakeholders," GTCR-R, the national civil society platform on REDD+, which is part of the working group responsible for drafting the BSP, had not received a French version of the advanced draft more than two years after it was published on the FCPF website in June 2018.<sup>25</sup>

Based on the June 2018 version, the direct monetary benefits to local communities are set at a minimum of 300,000 USD rising to a maximum of 2.2 million USD depending on their performance. Broken down, this equates to just 0.10 to 0.76 USD per capita based on upper population estimates. This is in stark contrast to private sector projects that are eligible for as much as 17.5 percent, or 9.6 million USD, of the total value of the credits to be purchased by the FCPF. It is unclear whether or what amount of the 17.5% will be used for community livelihood activities. To add to this disparity, private companies operating in the province, such as WWC, or the logging companies SOMICONGO and SODEFOR, hold a huge advantage over local communities in terms of their land holdings as well as their ability to lobby funders and develop technical proposals for sub-projects. Communities are thus left to compete with international organisations for the right to generate and sell carbon credits, while the one factor that could secure their carbon rights - land tenure - is entirely absent from the BSP.

Resources Initiative's (RRI) 2018 report, 'Mai-Ndombe: Will the REDD+ Laboratory Benefit Indigenous Peoples and Local Communities?'<sup>26</sup>. The report highlighted a number of concerns including that the REDD+ governance structure in the province is fragile and incomplete; REDD+ strategies do not address structural factors responsible for deforestation; there is a lack of concrete measures to secure communities' land rights and integrate local people and women into project activities; and there is uncertainty on how communities can access benefits.

In order to delve deeper into these issues at the ground level, the Bolukiluki team focused on two of the highest profile and most advanced initiatives in the province: the Plateau Integrated REDD+ Plateau Project (PIREDD Plateau) and the private WWC concession.

<sup>24</sup> Marine Gauthier, *Mai Ndombe: Will the REDD+ Laboratory Benefit Indigenous Peoples and Local Communities?* (Rights and Resources Initiative, 2018).

<sup>25</sup> *Note on Benefit Sharing from Emission Reduction Programs*

*Under the Forest Carbon Partnership Facility and BioCarbon Fund Initiative for Sustainable Forest Landscapes* (Forest Carbon Partnership Facility, 2019)

<sup>26</sup> Ibid.



# PIREDD PLATEAU



## KEY FINDINGS FROM PIREDD PLATEAU

Bolukiluki observers visited 19 villages and individually surveyed 278 community members in PIREDD Plateau, finding that:

- 64 percent of people surveyed have either never heard of REDD+ or could not describe it.
- Only 17 percent of respondents felt their community had the possibility to give their consent to the establishment of PIREDD Plateau. Of the 17 percent, almost half were village elites.
- Local Development Committees do not effectively represent communities and their members are often not sufficiently informed of what REDD+ is.
- Natural resource management plans developed under the programme do not adequately capture traditional land use systems of communities and most people do not know a plan exists for their village.
- In almost every village surveyed, the natural resource management plans were decided mainly between WWF facilitators and the land chief, and in some cases have led to increased forest clearance and restrictions on women's livelihoods.
- 96 percent of people surveyed either did not know they were entitled to benefits from the project or were not happy with how they were delivered.
- In June 2019, after suffering from food scarcity due to restrictions in the natural resource management plans and still not receiving payments, communities decided to protest PIREDD Plateau by burning savannahs they were supposed to protect under the project.
- None of the villages visited had successfully submitted a complaint to WWF and received a response.
- Many of the agents responsible for monitoring grievances and treating complaints hold an inherent conflict of interest as they are also responsible for implementing activities.
- Preliminary analysis in the PIREDD Plateau show that PIREDD activities have not decreased annual forest loss

The PIREDD Plateau is the first phase of the Mai Ndombe REDD+ programme and considered to be the most advanced REDD+ initiative in DRC. 14.2 million USD has been invested in the project since it was established in 2014.<sup>27</sup> Spanning the western part of the province, PIREDD Plateau covers the territories of Kwamouth, Mushie, Bolobo and Yumbi.<sup>28</sup> WWF as the Local Implementing Agency recruited four local organisations to structure Local Development Committees (CLD) and Agriculture and Rural Management Councils (CARG) in each village.<sup>29</sup> CLDs and CARGs are responsible for representing communities and organising activities at the field level.<sup>30</sup>

WWF's activities in the plateau target the land use practices of local communities through a combination of reforestation and protecting savannah areas. For reforestation, communities are given acacia, orange, oil palm, and cola seedlings to plant. For savannahs, communities must abstain from cultivating certain areas in the hope that these areas will regrow into forest. Areas for reforestation and protection are set out in the natural resource management plans (NRMP).



*World Bank officials in Mai Ndombe province*

In return for their efforts to plant seedlings and protect savannahs, communities are promised results-based payments, or monetary benefits. The seedlings and other resources necessary to

plant trees, categorised as non-monetary benefits, are distributed to communities through their CLD. Communities are to receive 150 USD for every hectare of forest they plant and 5 USD for every hectare of savannah they protect. The payments for these ecosystem services are supposed to be paid annually by WWF.

## FREE, PRIOR AND INFORMED CONSENT

To determine how informed community members are of REDD+, interviewees were asked whether they have heard of REDD+. 60 percent of those surveyed responded that they had. However, when asked to describe what REDD+ signifies for them, most did not know what it was but had merely heard the term before. In total, only 36 percent of people surveyed knew of REDD+ and could vaguely describe what it is, with answers varying from a precise "reduction of emissions from deforestation and degradation of forests" to a "it's an NGO".

To probe further into the extent that communities were aware of and freely consented to the project, the team enquired whether meetings were held to inform the village about the project. Only one third of community members, mostly from CLDs, recalled that a meeting was held. Finally, when communities were asked, "Do you think your community had the possibility to provide consent to the establishment of REDD+ on your land?" only 17 percent responded that yes, they felt their community had the possibility. Of these, almost half were village elites.

In certain villages surveyed, such as Maseke and Komambi, community members were told that PIREDD was a government project and since the land is owned by the state, they could not decide whether the project can take place or not. Members of the village Mongama said only the chief was involved in the establishment of the project. In another village, Maa, the chief told Bolukiluki observers that his community tried to withdraw their consent and submitted a letter forbidding that activities take place on their land.

<sup>27</sup> Laurent Valiergue, *Project appraisal document on a proposed strategic climate fund grant in the amount of US\$36.9 million to the Democratic Republic of Congo for an Improved Forested Landscape Management project* (World Bank, 2014).

<sup>28</sup> MAÏ-NDOMBE : Remarkable achievements with the Integrated REDD+ project - PIREDD (WWF, 2018) <<https://www.wwf-congobasin.org/news/?uNewsID=333754>>.

<sup>29</sup> WWF recruited the organisation Action Massive Rurale (AMAR) to structure CLDs and CARGs in Mushie, Tombokolo was recruited for Bolobo, GI Agro for Kwamouth, and CIAPAFED for Yumbi.

<sup>30</sup> Marine Gauthier, *Mai Ndombe: Will the REDD+ Laboratory Benefit Indigenous Peoples and Local Communities?* (Rights and Resources Initiative, 2018).

## LOCAL DEVELOPMENT COMMITTEES

Throughout PIREDD Plateau, Local Development Committees (CLDs) were structured to represent villages and function as interlocutors between communities and WWF. The main roles of a CLD include communicating with project implementers, treating and submitting grievances, and receiving and distributing benefits.

The researchers found that communities generally perceive CLDs more as an externally imposed structure rather than reflecting their customary systems. It is possible CLDs could have evolved to represent and defend the interests of communities; however, the speed with which they were assembled left little space for their role to be properly understood. Bolukiluki observers were told that the four local organisations WWF recruited swept through PIREDD Plateau spending as little as an afternoon to inform communities of what REDD+ is, the role of the CLD, and to organise elections to choose CLD members. Individuals friendly with WWF were usually presented as the potential candidates to elect, rather than allowing communities to nominate their own. The insufficient implication of communities has often resulted in opaque committees that lack legitimacy.

To illustrate, villagers from Lovua stated their CLD is not transparent in that there are no informational meetings and they do not receive feedback from CLD members. When this issue was raised with WWF agents, they were reportedly told to not interfere with matters relating to the management of the CLD. Villagers from Masiambio and Twa expressed frustrations that they were forced to accept CLDs that do not represent their interests but rather those of village elites and WWF.

In some cases, CLD presidents were elected without their knowledge. In the village Bosina, the CLD president told Bolukiluki observers that he was elected while he was working in the field and upon his return was given a document confirming his appointment. The president of Camp Ferrera was similarly elected while on a day trip to Mushie.

Several CLD members also expressed confusion and dissatisfaction with the project to Bolukiluki observers. Each CLD is supposed to sign a contract with WWF that defines which activities the village will carry out and what it will receive in return. Rather than being consulted on which activities would be useful for the community or negotiating the terms of the contracts, CLD members were reportedly given final versions to sign, often without fully understanding their contents. CLD presidents of the villages Bosina, Laddy and Mbala claimed they were given a contract to sign by WWF and told that if they did not take the agreement, other villages would.

The researchers also found that CLD members were often unaware of their role and responsibilities. Of the 95 CLD members interviewed, over half of them, or 55 percent, had either never heard of REDD+ or could not accurately describe what it was.

## NATURAL RESOURCE MANAGEMENT PLANS

Under PIREDD Plateau, villages are supposed to develop NRMPs that define how they shall use their land and resources over a five-year period, including what areas should be protected and where trees should be planted. These plans are mostly based on the concept of the 'village territory' which does not have legal basis in land tenure in DRC.

To be effective, it would be reasonable to expect that NRMPs incorporate customary rights and forest livelihoods as well as safeguarding the interests of women and other marginalised groups.<sup>31</sup> Yet, Bolukiluki observers found NRMPs were usually decided mainly between WWF's locally recruited organisation and the land chief, and that few people surveyed were even aware of their existence.

The negative impacts of NRMPs have been particularly acute on women. Women traditionally manage savannahs by ploughing the areas and using small fires to incinerate the grasses they dig up. The small fires also help keep mosquitoes away from houses and create an ideal environment to collect mushrooms, fruits, caterpillars, leaves, and other crops. Under WWF's NRMPs, savannahs are now meant to be

---

<sup>31</sup> RFUK was contacted by The World Bank and the UC-PIF in 2019 to use community mapping data from the MappingFor-

Rights programme to support development of the NRMPs but discussions have been stalled due to the coronavirus.



left untouched so neighbouring trees reforest the areas. Since communities, above all women, were not properly involved in the development of NRMPs, vital sources of food were cut off. To compensate, men cleared intact forest so women could cultivate other areas. In this way, the poorly designed NRMPs actually increased forest clearance in some areas.

It was also reported that the process of delineating village boundaries aggravated disputes between several communities. For example, the villages Komambi and Maa share an area and have disagreed over its limits for some time. Instead of working with both villages to create NRMPs understood and accepted by all members of both communities, only the NRMP for Maa was validated. Despite not wanting to participate in the project to begin with, the chief of Maa was told if he did not validate Maa's NRMP their land would be given to Komambi. Tensions are now heightened between the two villages as they are forced to accept boundaries they did not collectively agree to. A similar case was reported between the neighbouring villages of Mongama and Nkô. Villagers from Bosina, Bompensele, and Camp Ferrera also complained to Bolukiluki observers that they had not seen their validated NRMP after boundary disputes with neighbouring communities.

## BENEFIT DISTRIBUTION

Findings from Bolukiluki show that communities in PIREDD Plateau did not receive most of the benefits they were promised. Of the people surveyed in PIREDD Plateau, 60 percent were not aware their village was promised benefits in the context of REDD+. Of the 40 percent of people who were aware, 90 percent were not satisfied with the results.

There are two principal ways for communities to receive benefits under the project. First, through the rehabilitation of roads. WWF signed a contract with the Office de Route to improve roads that are difficult to access. Each CLD in turn signs a contract with WWF in the name of a village to maintain roads over a certain distance and to recruit local workers to carry out this work. However, many community members said they

were either not paid for their road work or never received the building materials. For example, villagers from Bopaka, Komambi, and Maseke said they had not been paid for their labour for over six months, while roads for the villages Bosina, Mbala I, and Laddy are still unfinished.



*A rehabilitated road under PIREDD Plateau*

The second way for communities to receive benefits is through receiving results-based payments for planting trees and protecting savannahs to generate emission reductions for the Mai Ndombe REDD+ programme. WWF is meant to pay communities 5 USD for every hectare of savannah they protect and 150 USD for every hectare planted with acacia and other fast-growing trees (in three instalments). WWF also agreed to provide the resources necessary, such as the tree saplings, to undertake these activities. Most of the villages received the tree saplings, which they planted on the borders of the savannahs to outline which areas are meant to be protected and left to regrow into forests. However, when it came time to reward communities for their efforts, the project did not deliver.

The amounts received varies across villages, yet it is clear none received the full sum they believe they were entitled to. More positive examples include the village Twa that received 1,600 USD for protecting savannahs, or 0.38 USD per inhabitant,<sup>32</sup> which they then used to buy a communal cassava mill. The village Mbwelembe

<sup>32</sup> Bolukiluki observers recorded the population of Twa as 4,232, meaning the payment received was equivalent to 0.38 USD per inhabitant.

received 840 USD for the 210 hectares they planted (still below the promised 1,050 USD). The other villages Bolukiluki observers visited have still not received the full amount of the results-based payments promised to them.

## BURNINGS OF SAVANNAHS (BUSHFIRES)

The communities' frustration came to a head in June 2019. For two years, several communities left the savannas untouched. Finally, after suffering from food scarcity due to restrictions placed on women's livelihoods, changing their practices to accommodate a project imposed on them, and still not receiving the promised payments, communities burned their savannas in protest. These fires were far greater than the traditional small-scale fires communities use to manage and cultivate these areas.

News spread from the villages, to the town of Mushie, all the way to Kinshasa. In response, Bolukiluki observers quickly deployed a mission to the villages of Bompensele, Camp Ferrera, Mbala II, Bosiki, Bopaka, Izono and Laddy. People interviewed said they had voluntarily burned the areas to destroy the results of the project and demonstrate their discontent. Five CLD presidents told Bolukiluki observers that they had not received payments for two years and had no resources to pay the people for their work. Women decried that they had no more space to work the land and that people were forced to cultivate forest areas instead. A woman from the village of Bosina stated:

*"Since the arrival of the project, these people arranged with the land chief to occupy a large part of our savannahs. The little bit of savannah that we have left is not enough, what to do? In our place would you travel kilometres to cultivate fields far away when your savannahs are right next door?"<sup>33</sup>*

Another woman in the village of Bompensele

declared:

*"We are surprised by the approach of the project that is taking place on savannahs. Now we protect the savannahs, however as a woman our pastoral activities were easy on the savannahs. Now we are forced to clear the forest to cultivate our fields, we destroy the forest to protect the savannah."<sup>34</sup>*

Meanwhile, in a sign of their desperation, the villages of Mbala, Mukoro,<sup>35</sup> and Bosiki made



Photos of the bushfires

<sup>33</sup> The original version was spoken in Lingala and Bolukiluki observers wrote it in French as « Depuis la venue du projet, ces gens se sont arrangés avec le chef de terre pour occuper une grande partie de nos savanes. La petite partie de savane qui nous est restée ne suffit plus que faire ? A notre place vous ferez des kilomètres pour aller faire les champs au loin alors que vos savanes sont justes à côté. »

<sup>34</sup> The original version was spoken in Lingala and Bolukiluki observers wrote it in French as « Nous sommes surpris par l'approche du projet qui se réalise dans la savane. Désormais

nous protégeons les savanes, cependant nos activités champêtres en tant que femme sont faciles dans celle-ci. Maintenant nous sommes obligés de défricher la forêt pour faire nos champs, nous détruisons la forêt pour protéger la savane. ».

<sup>35</sup> Mukoro is located close to the villages Komambi and Camp Ferrera. Bolukiluki observers did formally not visit Mukoro but were told this information in adjacent communities.



deals with the neighbouring SOGENAC cattle ranch to allow cows to graze on their burned savannahs in exchange for a cow or two. This is despite the communities suffering horrendous relations with the company whose guards are alleged to have tortured and killed a man accused of stealing meat<sup>36</sup> and whose presence has been linked to increased rates of malaria and sleeping sickness due to higher populations of mosquitos and the tse tse fly in the area. One chief repeated that he preferred to ally with the ranchers over WWF because at least the ranchers respected their agreements.

To summarise, in certain villages PIREDD Plateau imposed land use restrictions that cut off women's livelihood activities and increased pressure on intact forests. This ultimately sparked large scale land burnings and drove some communities into the arms of a cattle ranching company.

## GRIEVANCE MECHANISM

These kinds of problems could potentially have been avoided if a functioning grievance mechanism were in place for the project. Out of the 19 villages Bolukiluki observers visited inside the project, none had successfully submitted a complaint to WWF and received a response. This is certainly not because communities had no grievances, as the accounts above illustrate, but because people did not know who to contact. Certain villages tried to convey their grievances to project staff, but they either did not receive a response or their complaint was not accepted. For instance, the chief of the village Maa told Bolukiluki observers he did not want the project to take place in his village, which the CLD president corroborated. In 2017, he wrote a letter to the project manager, via the CLD, to announce his decision and never received a response. In the territory Kwamouth, the community of Masiambio wrote a complaint regarding late payments following a land dispute. A WWF facilitator gave them a form to register this, but there was never any follow-up. In addition to the absence of a grievance mechanism, there is no system to mediate conflicts between communities, some of which have been aggravated due to the natural resource management plans.

Yet on paper, a grievance mechanism exists. As part of providing institutional support, WWF accompanied the provincial government to establish Agriculture and Rural Management Councils (CARG), which are meant to receive and respond to complaints related to agriculture. CARGs were established at the territorial, chefferie and groupement levels, yet communities remain largely unaware of their existence. Even members of the CARGs admitted to Bolukiluki observers that the process to collect and treat complaints is largely unknown.

As the Local Implementing Agency for PIREDD Plateau, WWF is responsible for organising local audits of the mechanism; however, many of the agents responsible for monitoring grievances and treating complaints are also tasked with implementing project activities, posing a conflict of interest.

In November 2019, Bolukiluki observers re-visited six communities inside PIREDD Plateau: Bosina, Bopemsole, Maa, Komambi, Lovua, and Mongama.<sup>37</sup> Grievances were noted in each community including the installation of the



<sup>36</sup> Further evidence of this allegation is available upon request.

<sup>37</sup> A full list of all of the complaints documented during this mission is available upon request.



project without the communities' FPIC, limited space for women to carry out activities, road workers not being paid, inter-communal disputes based on the boundaries of natural resource management plans, and the lack of promised benefits, along with other concerns. Bolukiluki observers forwarded the following complaints from four communities to WWF's local office in Mushie:

- **Bosina:** Community members stated they do not have enough cultivatable land for their traditional livelihoods because of the project. This problem was particularly acute for women. Community members believed it was because they were excluded from developing the NRMP that designated what areas would be devoted to savannah protection.
- **Komambi:** Community members submitted

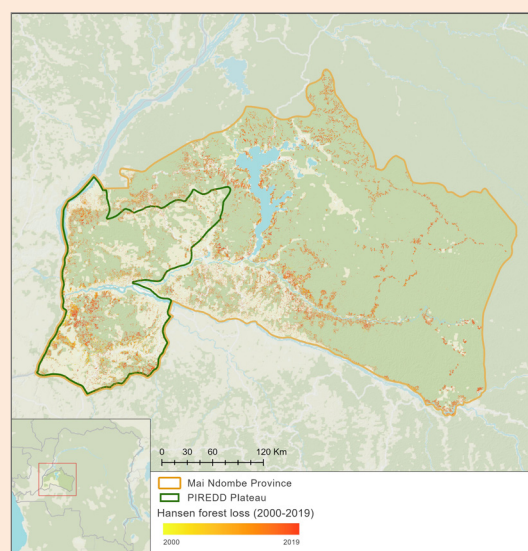
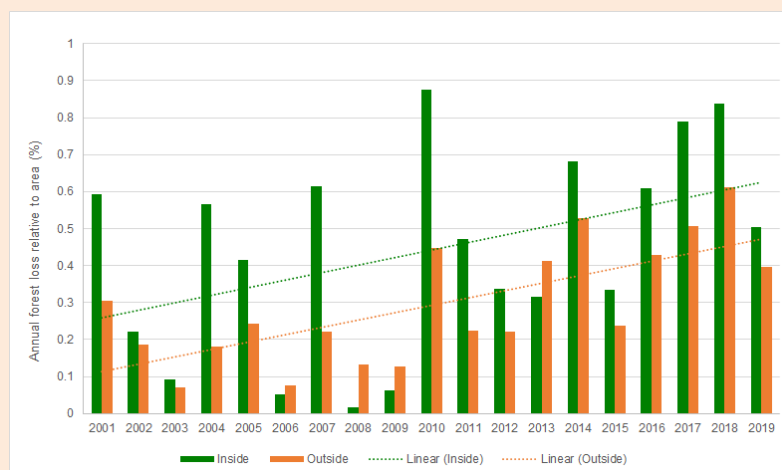
a complaint regarding the NRMP's land boundary, the delay of promised payments, and that WWF agents did not follow customary traditions when visiting their community.

- **Maa:** Community members submitted a complaint stating that their FPIC was not obtained for the establishment of the project and that they were not consulted on how space would be allocated or which tree species would be planted under the NRMP.
- **Mongama:** Community members stated that during the creation of their NRMP, a part of their customary territory was allocated to a neighbouring clan without their consent.

The communities had yet to receive a response at the time of writing.

## FOREST LOSS INSIDE THE PIREDD PLATEAU

Preliminary analysis using Hansen et.al.<sup>38</sup> forest loss data shows there is no discernible difference in forest loss since the PIREDD Plateau was established in 2015. The analysis below compares relative annual forest loss inside the PIREDD Plateau to the relative annual forest loss in the entire Mai Ndombe province. The graph demonstrates that relative annual forest loss inside PIREDD Plateau is higher than the rest of the province and shows no signs of decreasing. It therefore appears that PIREDD activities in the province have not decreased forest loss inside the Plateau.



<sup>38</sup> Hansen et.al., *High-Resolution Global Maps of 21st-Century Forest Cover Change* (Science, 2013).

# WILDLIFE WORKS CARBON CONCESSION, PIREDD MAI NDOMBE



## KEY FINDINGS FROM THE WWC CONCESSION

Bolukiluki observers visited seven villages and individually surveyed 131 people inside the WWC concession, finding that:

- 70 percent of respondents said they have never heard of REDD+, with women particularly unaware.
- Of the 30 percent of respondents who have heard of REDD+, only 8 people felt their community had the opportunity to provide their consent to the project.
- Despite most of the concession being subject to customary claims and usages, there has been little effort to integrate these into the management of the area.
- In the villages visited, most of the Local Development Committee members were chosen by WWC agents rather than elected by the communities.
- 96 percent of people surveyed either did not know what benefits WWC promised to their village or were not satisfied with them.
- Agreements between WWC and communities were not available in the villages surveyed, community members have minimal understanding of their contents, and in some instances, they were signed on behalf of communities by outsiders.
- The presence of the project has sparked serious inter-communal conflict between certain villages.
- WWC agents obstructed the work of the teams who were who were legally surveying communities in its concession.
- Preliminary analysis inside the WWC concession show that changes to forest loss increased since the company acquired the concession in 2012.

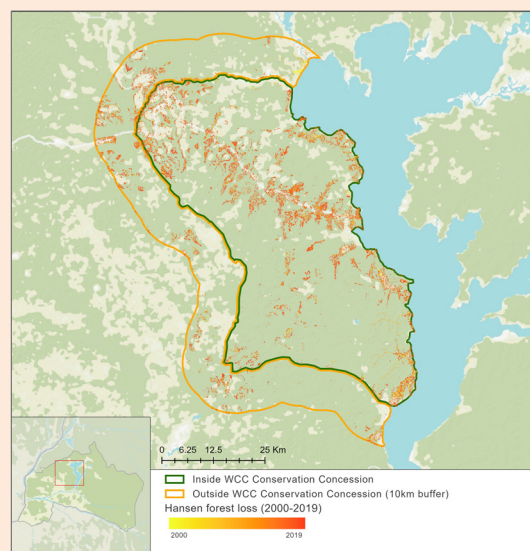
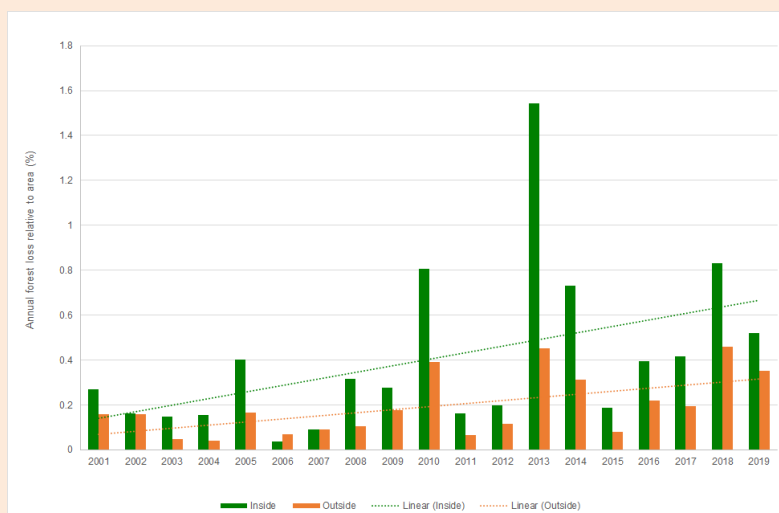
Wildlife Works Carbon (WWC) acquired its REDD+ concession from the Canadian company ERA in 2012.<sup>39</sup> The company's rationale is that their acquisition of the concession prevented it from being allocated for industrial logging and the 'cascade of deforestation' that would ensue once logging roads open up previously intact forests to new settlements and farms. While there is a need for more research into the long-term impacts of logging concessions on forest cover,<sup>40</sup> this claim overlooks there has been a national moratorium on new logging concessions in place since 2002 and that the two previous logging concessions that make up WWC's project were already suspended in 2008 as part of a legal review of DRC's national forest titles.<sup>41</sup> The project's emissions reference level thus rests on the assumption that "the possibility existed" the government would have illegally reallocated the suspended concessions to a logging company.<sup>42</sup>

The WWC concession was nonetheless certified by Verified Carbon Standard (VCS) and it is still the only project eligible in DRC to sell REDD+ carbon credits. The VCS registry states that the project will generate 175 MT of carbon reductions over 30 years.<sup>43</sup> As of November 2020 the project had issued 13,322,276 carbon credits according to VCS.

In addition to its private sales, WWC also stands to be a major beneficiary of the Mai Ndombe REDD+ programme in two ways. First, as a private sector partner of the programme, the company could receive over 9 million USD under the advanced draft benefit-sharing plan<sup>44</sup> - although the company threatened to pull out of the programme due to an FCPF requirement to reduce its reference level and thus the amount of credits it will be able to generate and sell.<sup>45</sup> Second, it was recruited by the World Bank and

## FOREST LOSS INSIDE THE WWC CONCESSION

Preliminary analysis using Hansen et.al.<sup>46</sup> data shows that forest loss has increased in the WWC concession since it was acquired in 2012. Analysis of a 10km buffer around the concession also shows higher rates of forest inside the concession than areas outside.



<sup>39</sup> Marine Gauthier, *Mai Ndombe: Will the REDD+ Laboratory Benefit Indigenous Peoples and Local Communities?* (Rights and Resources Initiative, 2018).

<sup>40</sup> See forthcoming research by RFUK.

<sup>41</sup> *The Mai Ndombe REDD+ project* (Wildlife Works Department of Carbon Development, 2012).

<sup>42</sup> Ibid.

<sup>43</sup> *Project and Credit Summary* (Verified Carbon Standard, 2019), <<https://registry.verra.org/app/search/>>

VCS?programType=ISSUANCE&exactResId=934>.

<sup>44</sup> *Advanced Draft Benefit-Sharing Plan for the Mai Ndombe Emission Reduction Program in the Democratic Republic of Congo* (2018).

<sup>45</sup> The disagreement over WWC's reference level is understood to be the principal reason the Mai Ndombe BSP has still not been published.

<sup>46</sup> Hansen et.al., *High-Resolution Global Maps of 21st-Century Forest Cover Change* (Science, 2013).



the FIP Coordination Unit to be the joint Local Implementing Agency for the CAFI-funded PIREDD Mai Ndombe.

## FREE, PRIOR AND INFORMED CONSENT

Although WWC claims that project activities were “selected in consultation with the local communities,”<sup>47</sup> Bolukiluki observers found that 70 percent of respondents had never heard of REDD+. Of the remaining 30 percent that had, only 8 people responded they felt their community had the opportunity to provide their opinion on the project’s establishment. The findings show that women are particularly marginalised from village deliberations and it seems there has been little effort to involve them.

In some cases, it appears WWC failed to consult entire villages in its concession. Respondents in the village Bobolampinga explained how they were told by WWC agents that they did not need to be consulted as their land was assigned to the village Mbale whose chief authorised the project. Bobolampinga is now left without a proper agreement to negotiate with WWC. In another village, Iballi, which neighbours the SODEFOR logging concession, a CLD member expressed the community’s confusion by stating:

*“During the time of SODEFOR, we knew what they were doing in our forest, that is to say logging, but as far as WWC is concerned, we understand nothing and nobody really knows what they’re doing in our forests, we see their engineers going back and forth without understanding anything.”<sup>48</sup>*

## LAND RIGHTS AND LAND USE IN THE CONCESSION

The estimated 50,000 people living in and around the concession are effectively prevented from being able to obtain legal tenure over areas they have inhabited and managed for generations. While the company has made some agreements with local clan chiefs in recognition of their customary rights, there is little evidence of how these rights and land uses have been

incorporated into the management of the concession.<sup>49</sup>

## LOCAL DEVELOPMENT COMMITTEES

As with PIREDD Plateau, community participation in project activities is supposed to be organised through Local Development Committees (CLD). Bolukiluki observers found that these were not installed in every village.

However, several concerns were raised about those that were established. First, many are not officially recognised. Their statutes are not signed, notarised, initialled or dated, leaving their legitimacy highly questionable to outsiders. Second, most of the CLD members appear to be chosen by WWC agents rather than elected by communities, leading to a perception that they represent the interests of the company or elites over the village. Lastly, CLDs have little autonomy or financial capacity to manage activities. They are not involved in the purchase or sale of goods and keep little financial record of funds received or spent by communities. Every decision on how and when to distribute resources appears to be unilaterally made by WWC.

## BENEFIT DISTRIBUTION

Observers found that cahier de charge agreements, which define what benefits WWC will deliver and the role of communities, were drawn up for several villages. However, copies of these agreements are often not available in villages, community members lack understanding of their contents, and in some cases they were signed by people without legitimacy to do so. In any case, WWC’s project document does commit the company to:

- Build a minimum of 20 schools
- Construct health care centres in 5 villages
- Repair and extend secondary hospitals in 2 villages
- Assist transportation to off-concession markets for agricultural and other products

<sup>47</sup> *The Mai Ndombe REDD+ project* (Wildlife Works Department of Carbon Development, 2012).

<sup>48</sup> The original version was spoken in Lingala and documented in French as « pendant l’époque de SODEFOR, on connaissait ce qu’elle faisait dans notre forêt c’est – à – dire l’extraction des bois, mais pour ce qui est de WWC, on ne comprend rien et personne ne sait réellement ce qu’ils font dans notre forêt,

*on voit ses ingénieurs faire des allées et retour, sans rien comprendre ».*

<sup>49</sup> *REDD and Rights in DRC: The implications of community mapping for the Mai-Ndombe Integrated REDD programme* (Rainforest Foundation UK, 2018), <<https://www.rainforestfoundationuk.org/media.ashx/redd-and-rights-in-drc->>>.

## LOCAL DEVELOPMENT COMMITTEES UNDER PIREDD MAI NDOMBE

During the time Bolukiluki observers visited the PIREDD Mai Ndombe area (outside of the WWC concession), CLDs were still in the process of being structured. However, a similar pattern from elsewhere in the region was already emerging. In the Indigenous village Bobangi, community members were asked to accept a Bantu person who lives four kilometres away to be the secretary of the CLD under the false pretext that none of the community could read or write. In a region where Indigenous Peoples often suffer from marginalisation and discrimination by dominant ethnic groups, installing an outsider to represent their interests embedded a feeling of mistrust and reluctance to engage with Bobangi's CLD.

- Provide a network of rural canteens
- Improve agricultural production techniques
- Recruit employees from local communities<sup>50</sup>

These benefits would undoubtedly benefit the local population. Although some buildings were constructed, Bolukiluki observers found that only a fraction of the promised benefits were delivered and in a haphazard fashion. For example, Bolukiluki observers were told that WWC circulated a mobile clinic through communities to provide medical consultations and surgeries, yet there is a perception that CLD members and their families were the main beneficiaries of this service. For the 2017 school year, WWC paid the fees for students to participate in state examinations, but only for certain students. The community members from Bobolampinga are still waiting for the school they were promised.

The village of Ibali was reportedly promised a school, a health centre and a rehabilitated route from N'selenge to Lobeke. WWC told the village that to build the health centre it would purchase the bricks from the community at a cost of 250 Congolese francs or 0.13 USD per brick. Community members proceeded to make 11,000 bricks only to be told they would only be paid 50 francs or 0.03 USD, which at the time of research was still owed to the community. The bricks are now left waiting to be used and all the sand the community collected to build the school was washed away by rain.

The most prominent activity undertaken by WWC is to implant demonstration gardens to encourage farmers to reduce forest clearance from shifting agriculture and charcoal production.



*Bricks made by the village Ibali waiting to be used.*

There were demonstration gardens in all villages visited and some gardens of between 2 m<sup>2</sup> to 10 m<sup>2</sup>, where produce such as onions, aubergines, yams and potatoes are grown. Some villagers expressed enthusiasm about the gardens and the varied diet they support. However, take up in most villages has been limited and little of the produce has made it to local market. While these activities have not led to marked improvements in livelihoods, the forest loss map and graph above also show they have had little effect on reducing forest loss.

These different accounts are further corroborated by statistics. Of the people surveyed who had heard of REDD+, 53 percent said they were promised benefits by WWC and of these, only four were satisfied with how the benefits were delivered. In other words, 96 percent of people surveyed either did not know what benefits WWC promised to their village or were unhappy with them.

<sup>51</sup> Wildlife Works Department of Carbon Development, *The Mai Ndombe REDD+ project* (2012).

In summary, after almost a decade since WWC acquired the concession, there is extremely limited understanding of the project, communities surveyed received negligible benefits, CLDs lack adequate resources to undertake development initiatives, and many villages remain without a legal agreement to hold WWC accountable. While the company states that communities share two percent of the proceeds, few people are aware of the carbon credits being sold in their name on land they already consider as theirs.<sup>51</sup>

## INTER-COMMUNAL CONFLICT

Suspicion over the company's intentions has sparked serious inter-communal conflict and other problems in the area. Such is the hostility towards the project that WWC agents were effectively unable to enter a large part of the concession at the time of research.<sup>52</sup>

### *Man killed in conflict between two villages*

The Bosanga district inside the Ngongo village grouping accepted the WWC project. Members from a neighbouring district, Ngelesa, were strongly opposed to it. At an inauguration event in Bosanga, a fight ensued between two groups, reportedly leading to the death of a man and the burning of numerous houses. People from Bosanga then retaliated by destroying houses of people from N'tande Ngongo, the capital of the Ngongo village grouping, who they believed were responsible for the attack. A follow up mission by WWC agents to N'tande Ngongo to try to explain the project only led to more upheaval.

### *Conflict over school facilities*

In the village of Mbale, community members recounted to Boulukiluki observers a dispute that took place. WWC promised they would build a school with eighteen classrooms to replace the three schools in the village that were made from mud and thatched roofs. Instead, it constructed one new school with six classrooms, which caused great confusion and conflict among students and teachers. The arguments culminated in a physical altercation between two school prefects. The village has reportedly now decided to destroy the new school to avoid conflict.

## OBSTRUCTION OF RESEARCH

Despite being certified by VCS, which is supposed to monitor WWC, local WWC agents seem to go to great lengths to avoid further scrutiny of the project.

On several missions, Bolukiluki teams were summoned to the police and other local authorities at the apparent request of the company. Each time, they were released after explaining the purpose of their work. Other examples include WWC agents disrupting their work with local communities, asking an observer to delete survey data and pressuring a community member to retract what he recounted in favour of a statement in support of WWC.

## GRIEVANCE MECHANISM

As with PIREDD Plateau, had there been a functioning grievance mechanism in place, perhaps many of these problems could have been avoided. Bolukiluki observers found that community members were unaware of how and where to raise complaints. After not receiving benefits set out in their cahier de charge agreements, some villages, like Mbwenzey and Wania, said they wanted to rescind their participation in the project but did not know who to speak with.



<sup>51</sup> Eric Marx, *NGOs fear UN REDD+ scheme to combat deforestation will lead to land grabs* (Reuters, 2018).

<sup>52</sup> There is strong opposition to the project, particularly in the western, inland region. This opposition may have prevented WWC from establishing CLDs as they were unable to access

parts of their concession. The risk of being mistaken for WWC agents also made it difficult for Bolukiluki observers to circulate freely in certain areas. For more information, please refer to *Congo Basin Rainforest Project: Communities Leery of 'Conservation Revolution'* (World Rainforest Movement, 2016).



# CONCLUSION

The Democratic Republic of Congo is home to some of the world's most intact, biodiverse and carbon rich tropical forests that sustain the lives and culture of tens of millions of people. The future of the forest is inextricably tied to the people who call it home.

REDD+ project documents and brochures are often couched in terms of 'rights' and 'benefits' but the data gathered by Bolukiluki observers from 26 villages in Mai Ndombe reveals a different picture. After more than a decade and at least 90 million USD of REDD+ linked investments in the province,<sup>53</sup> there has been little improvement to land tenure, few benefits have trickled down to local communities, and deforestation rates persist.

Touted as one of the world's most advanced REDD+ programmes, the experience of Mai Ndombe sets an alarming precedent. Yet there remains a disconnect between the growing scepticism of those with first-hand experience of the project and the enthusiasm of global institutions for REDD+ and other so-called nature-based solutions.

In DRC, the number of PIREDDs being established across the territory is growing steadily, many of which appear to be based on the same model. Globally, the Green Climate Fund put out a 500 million USD request for proposals for countries to apply for payments for their REDD+ results and has already approved proposals in Colombia, Indonesia, Paraguay, Chile, Ecuador, and Brazil.<sup>54</sup> The FCPF is pressing ahead with plans to approve 900 million USD for Emission Reduction Payment Agreements (ERPAs), Mai Ndombe's included.<sup>55</sup> Facing a lack of demand for REDD+ credits, the FCPF applied to sell credits to the aviation industry's offsetting scheme (CORSIA), which already approved purchasing credits from VCS.<sup>56</sup> Oil and gas firms are lining up to announce their own nature-based solutions offset schemes.

Without an urgent and independent review into the effectiveness of REDD+ and other offset schemes to deliver low-cost, socially equitable and verifiable emission reductions, we risk

another lost decade of climate action on forests.

## RECOMMENDATIONS

Rather than prolonging an era where forest communities are side-lined in efforts to generate carbon credits that exist only on paper, rights-based approaches should be propelled to the forefront of climate funding commitments.<sup>57</sup> Community forests currently offer the best option for communities to defend their interests and directly benefit from climate-friendly livelihoods in DRC. Early pilots for community forests have shown that communities place significant emphasis on forest-friendly livelihoods and conservation. Yet these account for less than one percent of the country's total forest area and there is a need for much greater investment in this model.

### *Recommendations for REDD+ project implementers*

- Obtain and document the FPIC of local communities for any future REDD+ activities.
- Revise NRMPs to ensure they reflect customary tenure and management systems as well as the needs of women and other marginalised groups. Where possible, accompany communities to establish these areas as community forest concessions.
- Review the effectiveness and representativeness of CLDs as the go-to community structure. In our practical experience, the DRC community forest model provides a more robust and accountable governance structure.
- Increase transparency by publishing project budgets showing what proportion of funding is channelled to community activities.
- Publish and honour commitments made to local communities in cahier de charge agreements and project benefit sharing plans.

### *Recommendations to the Congolese government*

- Conduct detailed studies of the direct and indirect drivers of deforestation in the target areas to ensure appropriateness of REDD+ interventions.
- Complete a diagnostic study on land use in

<sup>53</sup> Marine Gauthier, *Mai Ndombe: Will the REDD+ Laboratory Benefit Indigenous Peoples and Local Communities?* (Rights and Resources Initiative, 2018).

<sup>54</sup> *REDD+ Results-based Payments Pilot* (Green Climate Fund), <<https://www.greenclimate.fund/redd>>.

<sup>55</sup> *Portfolio Management Update* (Forest Carbon Partnership

Facility, 2020).

<sup>56</sup> *Carbon Offsetting and Reduction Scheme for International Aviation* (ICAO) <<https://www.icao.int/environmental-protection/CORSIA/Pages/default.aspx>>.

<sup>57</sup> Community forests provide a much stronger basis for community engagement in emission reduction activities.

all provinces, including through consultations with local and provincial organisations, before validating a national land use policy.

- Ensure greater enforcement of national REDD+ safeguards, sectoral laws and regulations in emission reduction programmes.
- Establish an accessible, culturally appropriate and streamlined grievance and feedback redress mechanism for local communities impacted by REDD+ projects.
- Include civil society representatives in all decision-making processes related to REDD+. Leveraging their expertise and proximity to communities will bring into fruition more inclusive programmes.

#### *Recommendations to civil society*

- Support ground-truthing missions to independently monitor the progress and status of REDD+ programmes in DRC.
- Conduct awareness raising in communities to increase understanding of their rights in relation to REDD+ implementation on their lands.
- Ensure that community representatives are present during key negotiations and decision-making processes related to REDD+.

#### *Recommendations to donors*

For Mai Ndombe

- Include much greater direct provision for local communities in benefit-sharing plan including their right to non-carbon benefits.

- Support a programme of participatory land use planning and community forest establishment in the province to create the conditions necessary for equitable and sustainable emission reduction activities.
- Strengthen project appraisal, due diligence and oversight processes to ensure funding is compliant with social safeguards on FPIC, land rights, grievance mechanisms and benefit distribution.
- Channel much greater support to local and national civil society organisations, including mandating them to conduct truly independent monitoring of the Mai Ndombe REDD+ programme and other PIREDDs.
- Carry out an audit of the programme to determine value for money and specifically the proportion of funds spent on community level activities versus overheads of intermediary organisations.
- Avoid potential conflicts of interest in recruiting private REDD+ project holders as Local Implementing Agencies.

In general

- Commission an independent cost-benefit analysis of the effectiveness of the FCPF and other REDD+ funds over the past thirteen years.
- Remove subsidies for unproven market-based offset approaches and place much greater emphasis on clarifying and securing communal tenure as a prerequisite for further investment.





2-4 The Atelier, Old Dairy Court,  
17 Crouch Hill, London, N44AP  
+44 (0)20 7485 0193  
[info@rainforestuk.org](mailto:info@rainforestuk.org)

[Rainforestfoundation.org](http://Rainforestfoundation.org)



Sise à L60, Avenue Isoke - Huileries,  
Commune de Kinshasa, République démocratique  
du Congo (RDC)  
[apemasblrdc@gmail.com](mailto:apemasblrdc@gmail.com)

---

Registered Chairy No. 1138287 | Registered Company No. 7391285