

# Safeguards at a glance

Are the Monitoring, Reporting, Verification, and Grievance Redress Mechanisms of voluntary standards supporting community rights in REDD+?

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### **Key messages**

- While carbon accounting has comprehensive guidelines and is a funding priority in REDD+ readiness, there is no similar emphasis on the assessment of compliance with social safeguards through a monitoring, verification and reporting (MRV) system, or for grievance and redress mechanisms (GRMs).
- Our analysis shows an absence of stakeholder involvement in the design and implementation of both MRV procedures for safeguards and the design of GRMs; meaningful local engagement is needed, particularly of Indigenous Peoples and local communities (IPs and LCs).
- Most of the standards recognize gender inequalities, but fail to promote gender-responsive approaches in both safeguards MRV and GRMs; such approaches would promote equity through mechanisms that consider women's perspectives as well as their unequal access to resources and benefits.
- Accessible GRM procedures are mentioned across various standards, but specific details regarding culturally
  appropriate content, dissemination and specific procedures are often lacking.
- Rigorous safeguards MRV and GRM requirements are essential for the effective implementation of REDD+
  projects and programmes that aim to go beyond 'doing no harm'; requirements should promote transparency and
  accountability, and include clear thresholds, indicators and consequences for non-compliance.

This flyer is part of a series on REDD+ safeguards, focusing on the rights and social inclusion concerns of the women and men of the Indigenous Peoples and local communities (IPs and LCs) that steward the forests where climate solutions are implemented. Flyers provide lessons for application in different national contexts, present evidence for decision makers and practitioners to consider the implications and benefits of supporting the rights of IPs and LCs, and contribute to the participation of IPs and LCs representatives in discussions on and monitoring of safeguards.

#### Introduction

The United Nations Framework Convention for Climate Change (UNFCCC) mechanism for reducing emissions from deforestation and forest degradation (REDD+) was introduced as a tool to mitigate climate change while simultaneously promoting social and environmental benefits in forested regions. In 2010, seven safeguards – the Cancun safeguards – were articulated for countries implementing REDD+ activities; two safeguards engage directly with the rights of Indigenous Peoples and local communities (IPs and LCs).

REDD+ safeguards emerged in part as a response to concerns raised by forest-dependent IPs and LCs and allied organizations regarding the mechanism's potential impact on their rights and territories (Lofts et al. 2021). The role of safeguards has been conceptualized in different ways, ranging from bulwarks preventing harm, to tools promoting sustainable and inclusive development (Arhin 2014). However, challenges exist in their practical implementation and enforcement (Saeed et al. 2017). There is an inconsistent application of safeguards across REDD+ countries that is framed by the lack of guidelines from the UNFCCC (Morveli et al. 2023), and dissimilar levels of support for the rights of IPs and LCs in national policy and legal frameworks (Sarmiento Barletti and Larson 2020).

The monitoring, reporting and verification (MRV) of carbon emission reductions is a priority in REDD+ funding and technical support, including the development and updating of robust methods that often include requirements for thirdparty verification. Conversely, the monitoring of safeguards tends to be overlooked (De Sassi et al. 2015). Countries are required to submit a Safeguard Information System (SIS) to the UNFCCC as part of their national REDD+ architecture. Each SIS is a self-reporting exercise on how a country addresses and respects the Cancun safeguards in the implementation of REDD+. However, there are only general requirements from the UNFCCC on how these exercises are to be carried out. SISs are country-driven, flexible (to allow for improvements over time), implemented at the national level, and build on existing systems as appropriate (UNFCCC Decision 12/CP.17). There is a similar lack of explicit guidelines regarding the role of grievance and redress mechanisms (GRMs), which we posit should be linked to a safeguards MRV. UNFCCC decisions, including the Cancun safeguards, do not explicitly require the implementation of such mechanisms.

The absence of formal guidelines for safeguards MRV and for GRMs poses challenges in assessing and addressing the social impacts of REDD+ (Duchelle et al. 2017). Not only are such mechanisms a key aspect of more effective and efficient REDD+, but there is evidence that local-level data collection can contribute to more comprehensive and equitable monitoring efforts (De Sassi et al. 2015). Transparent and robust GRMs can support project proponents by providing information to resolve implementation challenges (Mackenzie 2012).

The contemporary proliferation of voluntary standards for climate investment may provide an opportunity to streamline rights-responsive safeguards MRV and GRM mechanisms

to support a transition from safeguards that seek to 'do no harm' to ones that aim to 'do better'. This flyer is part of a series on REDD+ safeguards examining the rights and social inclusion concerns of the IPs and LCs that steward the forests where climate solutions are commonly enacted. We aim to provide lessons for the application of such standards in different national and subnational contexts, to enable standard proponents to compare their safeguards provisions with those of others, and for REDD+ implementers to consider the implications and benefits of supporting the rights of IPs and LCs.

The first flyer of this series presents an 'at a glance' comparative analysis of eleven standards and guidelines that apply to REDD+ (Sarmiento Barletti et al. 2021). This flyer examines the same standards and guidelines, focusing on the extent to which they align with criteria for establishing effective and reliable safeguards MRV and GRMs.

# Background: REDD+ safeguards MRV, GRMs and beyond

There is no comprehensive and standardized guidance for measuring and reporting social impacts in the context of REDD+ (Saeed et al. 2017). While clear rules exist for carbon emissions accounting, the assessment of social aspects lacks similar guidance (Duchelle et al. 2017). The development of pathways to design and implement safeguards has been slow, and many stakeholders are awaiting clarification regarding the definition and requirements for monitoring and reporting compliance with the Cancun safeguards, including appropriate indicators, data collection methods and reporting frameworks (Jagger et al. 2014).

Although the absence of strict guidelines promotes flexibility and national ownership of reporting processes, it also introduces uncertainty over what it means to comply with safeguards (Jagger et al. 2014). Thus, rigorous safeguards MRV is not the norm, and it is not mandated by most safeguard standards (Saeed et al. 2017). At the same time, insufficient funding and institutional capacity gaps pose challenges to the implementation of robust safeguards MRV systems (Cromberg et al. 2014; Loft et al. 2016). Similarly, there are few comprehensive descriptions detailing the operational aspects of project- or programme-level GRMs (Pande and Hossain 2022).

The literature also underscores the difficulties associated with implementing and enforcing safeguards, as well as the disconnect between safeguards discourse and implementation (Lofts et al. 2021). This is exacerbated by the lack of alignment across safeguards policies and the disconnect between REDD+monitoring initiatives across different levels (Jagger et al. 2014). Scholars have identified limited consolidated knowledge regarding the outcomes and effectiveness of GRMs (Pande and Hossain 2022). While guidance notes and proposals outline normative and aspirational goals for GRMs, they often lack concrete examples of how these mechanisms work (MSI Integrity 2016; UNDP 2017). Specialists have also noted a conflict between reporting on social safeguards and the high quality and timely data that reflect on-ground circumstances;

this underscores the importance of incorporating participatory approaches into how REDD+ social impacts are assessed (Jagger et al. 2014). Effective local participation can mitigate implementation costs and improve enforcement and monitoring (Cromberg et al. 2014). In fact, the integration of REDD+ monitoring across different scales and disciplines may be essential for comprehending the trade-offs and synergies that could significantly influence the effectiveness, efficiency and equity of REDD+ (De Sassi et al. 2015). The literature also emphasizes the importance of a locally driven, bottom-up approach, with recent initiatives starting to explore the potential of community-based MRV (De Sassi et al. 2015).

The integration of gender considerations within the framework of safeguards MRV and GRMs also has significant implications for the effectiveness and equity of REDD+ initiatives. The emphasis on carbon MRV in REDD+ has often resulted in gender being reduced to a bureaucratic obligation; this oversight can exacerbate existing gender disparities and perpetuate structural inequalities within forest-dependent communities (Bee and Sijapati Basnett 2017).

Different authors underscore the importance of MRV, including the need to create effective indicators for tracking progress in safeguard implementation (Wong et al. 2019), ensuring that IPs and LCs – and the women and more marginalized groups within those communities – are involved throughout the process of REDD+ design, implementation and monitoring (Lofts et al. 2021). REDD+ programmes should formulate rigorous MRV requirements that promote the effective implementation of safeguards, with clear thresholds and indicators, and consequences for non-compliance (Lofts et al. 2021). At the same time, GRMs can contribute to the timely achievement of REDD+ objectives, enhance trust and confidence in REDD+ projects, and promote equitable and fair distribution of benefits, costs and risks (Mackenzie 2012). To ensure that recipients align with their stated REDD+ co-benefit objectives, donors rely heavily on their independent due diligence processes, monitoring and evaluation systems, and payment assessments (Roe et al. 2013). Having rigorous harmonized guidelines and standardized reporting formats would enable the verification of compliance, reduce costs, and enhance transparency (Roe et al. 2013).

### Preliminary analysis: Attention to safeguards MRV and GRMs in voluntary standards and multilateral guidelines for REDD+

The following analysis was drawn from official documents for each institution or standard (see references at the end of this flyer).

Out of the eleven standards assessed, six met the criteria for offering comprehensive MRV guidelines, for example, tools such as templates and indicators, and outlining the scope and periodicity of monitoring activities. Three standards explicitly involved stakeholders in MRV design and implementation. One stood out as it ensures participatory monitoring throughout the lifecycle of activities, engaging relevant groups

#### Box 1. What's in the tables?

The two tables list safeguard guidelines from multilateral institutions that fund REDD+, as well as voluntary standards set for REDD+.

Table 1. The first line (a) sets out the ratings we assigned each guideline/standard regarding their recognition of, and compliance with MRV of social/rights concerns in the first flyer of the series. The rest of the table reveals to what extent these issues are addressed in the following five themes: (b) guidelines for MRV; (c) stakeholders' involvement in the design and implementation of MRV; (d) gender considerations; (e) public reporting/accessibility; and (f) independent/external verification.

Table 2. The initial row (a) displays the ratings we assigned to each guideline/standard regarding their recognition of, and compliance with GRMs in the first flyer of the series. The other rows illustrate seven qualifiers: (b) project-level mechanisms; (c) guidelines for GRMs; (d) accessibility/dissemination; (e) stakeholders' involvement in the design and implementation of GRMs; (f) appeals process, access to an institutional accountability mechanism and independent third party; (g) gender considerations; and (h) tracking of grievances and progress/public reporting.

Safeguard guidelines/standards were rated as fully aligning with the criterion ('Yes'), aligning in a limited way ('Partial' – for those that only met some aspects of the criterion), or not aligning ('No').

of IPs and LCs at every stage. Other standards (5/11) made partial provisions, as they "recommend" or "may require" stakeholders' involvement in cases of involuntary resettlement.

Most of the standards (10/11) incorporated explicit provisions for project-level GRMs, and just over half (6/11) included guidance for GRMs, such as how actors should be able to submit their grievances, how project proponents should register grievances, and how procedures should be publicized. However, only two standards required that stakeholders be involved in the design, planning and implementation of GRMs; another four involved them depending on the project's risks, or under specific situations.

More than half (7/11) of the evaluated standards had some alignment with gender considerations for safeguards MRV. Three standards stood out for their engagement with such considerations; one emphasized gender inclusion as an element for investment decisions, another required proponents to implement a gender-responsive system to manage risks and impacts, and the third established a gender equality standard, including responsive indicators and disaggregated data. Only four required gender-responsive approaches to GRMs; one of those included specific procedures for sexual and gender-based violence.

Table 1. Safeguards at a glance: Safeguards MRV in voluntary standards and multilateral guidelines for REDD+

		African Development Bank (AfDB)	Asian Development Bank (ADB)	Green Climate Fund (GCF)	Inter-American Development Bank (IDB)	Forest Carbon Partnership Facility Carbon Fund
	(a) MRV of social/ rights concerns	Yes With procedure and guidance	Yes Due diligence and review	Partial Disbursements not contingent on safeguards performance	Yes Project reports, bank also monitors	Yes Indicators; includes 'default' events
	(b) Guidelines for MRV	Yes Guidelines for different tools and MRV requirements	Yes Guidelines for safeguards tools, including monitoring	Partial Annex for Monitoring and accountability framework for accredited entities	Partial Proportionate to the project's social risks and impacts	Yes Provides guidelines and descriptions of procedures for monitoring
	(c) Participatory design and implementation	Partial  May be required for some mitigation or enhancement measures	Yes Focus on Involuntary Resettlement and IP Plan	Yes Communities, stakeholders and civil society organizations throughout the life cycle of activities	Partial Where appropriate; focus on resettlement and livelihood restoration	Partial When projects are designed to provide benefits only to IPs
	(d) Gender considerations	Yes Gender data and performance indicators for equality and empowerment	Partial For cases including IPs and involuntary resettlement, gender- disaggregated information	Yes Gender- responsive systems to manage risks and impacts	Yes Gender-sensitive monitoring and with gender- responsive indicators	No
	(e) Public and accessible reporting	Yes Reports of monitoring exercises are publicly available in appropriate national and local settings	Yes Disclose reports and safeguards frameworks in an accessible place and form	Yes Annual performance and evaluation reports; integrated online platform and in-country consultations	Yes Disclose project information in a timely and accessible manner	Yes Regular reports of monitoring results in relevant local languages and in a culturally appropriate manner
	(f) Independent/ external verification	Partial  Depends on the project's risk category	Yes  Oversight by safeguards specialists; external experts to verify monitoring reports; and independent advisory panels	Partial  May require GCF or GCF- authorized third-party verification	Partial Depends on the risk category	Partial  Depending on the potential significance of environmental and social risks and impacts

Out of the eleven standards, nine included some sort of requirement for public reporting on safeguard performance. Most required proponents to demonstrate alignment by disclosing monitoring reports, safeguards plans and frameworks in accessible formats and languages. The more stringent (4/11) required independent and external verification of project monitoring, including oversight by safeguard specialists, engagement of external experts for MRV, and the establishment of independent advisory panels. Another set (5/11) "may" necessitate third-party monitoring, depending on the project's context – for example, in cases of conflicts. As for GRMs, 9/11 standards required reporting, including on how mechanisms were accessed, the complaints received, and how these were resolved.

In terms of accessibility for all stakeholders to GRMs and information on how to access them, most standards (10/11) met the criteria. However, while most (8/10) of these standards required culturally appropriate dissemination, there was little specificity on how to ensure this. Most of the standards (8/11) stated procedures for appeals processes, including access to institutional accountability mechanisms and/or independent third parties for mediating grievances.

#### **Conclusions**

Our comparative analysis reveals varying strengths, limitations and opportunities regarding the requirements that safeguards standards have introduced on reporting and grievance mechanisms. Only six of these standards offered comprehensive MRV or GRM guidelines, providing clear instructions that encompass independent institutional reviews and specific components for project-level GRMs. Recognizing the lack of specific guidance for different aspects related to REDD+ safeguards, we have previously underscored the importance of clear requirements that effectively support consistent safeguards implementation with well-defined thresholds, indicators and consequences for non-compliance (Lofts et al. 2021).

While most standards (10/11) incorporated project-level GRMs, only six actively or partially required stakeholder involvement in their design and implementation. This gap is also pronounced when considering requirements for safeguards MRV, where only three standards fully prioritized stakeholder involvement. The participation of IPs and LCs and other relevant stakeholders in the design,

The REDD+ Environmental Excellence Standard (TREES)	Climate, Community and Biodiversity (CCB) Standards	Land Rights Standard	The Plan Vivo Standard	Verified Carbon Standard (VCS)	VCS Jurisdictional and Nested REDD+ (JNR)
Partial Demonstration of procedural requirements; no awareness of change over time	Yes Indicators; independent VVBs	Yes	Partial Socioeconomic baselines; impacts to be reported	No Initial information on how safeguards were addressed	No Initial information on how safeguards were addressed
Yes Safeguard monitoring report template	Yes Provides monitoring report template	No	Yes Provides additional guidance and templates for the annual report	No	No
No	Partial Recommended evaluation by community groups	Yes Full collaboration considering self- determined priorities and locally defined approaches	Partial Where possible, participants should be involved in monitoring	No	No
No	Partial Optional criterion	Partial General principles	Partial Disaggregated by gender where appropriate	No	No
Partial  Documents are publicly available through the ART Registry; no mention of culturally appropriate means	Yes Disseminate the monitoring plan and any results of monitoring on the internet; summaries for communities	Partial Reporting on the effectiveness of implementing measures	Partial A summary of monitoring results must be shared with other stakeholders	No	No
Yes Involvement of an external body to assess the degree to which an ART programme complies	Yes Validation and verification through an independent audit of project descriptions and monitoring reports	Partial Full and effective cooperation with independent monitoring mechanisms	Yes Independent and external verification of the project's compliance with the Plan Vivo Standard	No	No

implementation and review of MRV procedures may facilitate the integration of local data into project-level assessments, mitigate implementation costs, and enhance enforcement (Cromberg et al. 2014). In a similar vein, the participation of community actors in the development and implementation of GRMs is important to ensure accuracy and relevance, but also to promote transparency and accountability, and as a tool to support reflexive and adaptive approaches to project implementation.

Seven standards integrated gender considerations, either fully or partially, into their MRV processes, and four did so for GRMs. Two standards have set a precedent by aligning both gender considerations in GRMs and safeguards MRV. This underscores the need for improvement to ensure that the diverse impacts of REDD+ initiatives on the men and women of the IPs and LCs that steward the forests where REDD+ is being implemented are adequately assessed and addressed, and that key project mechanisms are accessible to all. Ensuring cultural accessibility to GRMs was a priority across standards (8/11), but they did not tend to provide guidelines for what this means. While it is important to recognize that different sociocultural contexts may require tailored engagement approaches (Sarmiento Barletti et al. 2020), it is also essential

to establish a set of general guidelines to ensure minimum standards for safeguards MRV and GRM procedures (see Carbon Market Watch 2023 for examples of best practices in GRMs). These guidelines may also aid in promoting conflict transformation, avoiding misunderstandings, and fostering transparent communication.

We will continue to update our analysis as part of GCS REDD+'s engagement with REDD+ safeguards, providing evidence-based recommendations towards a rights-responsive REDD+ that brings benefits to both forests and the men and women that steward them.

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Table 2. Safeguards at a glance: GRMs in voluntary standards and multilateral guidelines for REDD+

African Development Bank (AfDB)  Asian Development Bank (ADB)  Green Climate Fund (GCF)  Inter-American Development Bank (IDB)  Yes  Yes  Project cycle  Yes  ADB's own mechanism  Asian Development Bank (ADB)  Yes  Must report how complaints were received and resolved  Yes  Project's own; IDB also has one  Standards	p Facility nd
(a) Formal yes Yes Yes Must report how complaints were received and resolved Yes Project cycle ADB's own mechanism Yes Project cycle ADB's own mechanism Yes Project's own; IDB also has one standards	
	and
(b) Project-level mechanisms  Yes  Yes  Yes  Yes  Yes	
Yes Procedures for how grievances will be received, followed up and resolved  Yes  Yes  Yes  Partial  No detailed description of procedures  No detailed description of procedures  No procedures  No procedures  No procedures  The procedures  No detailed description of procedures  No procedures  The procedures of procedures  The procedures of procedures of procedures of procedures  No procedures of procedur	its the
Yes Yes Yes Culturally appropriate and accessible for cycle and culturally appropriate appropriate appropriate accessible and accessible appropriate appropriate appropriate appropriate appropriate and accessible appropriate appropriate appropriate and accessible appropriate appropriate appropriate and accessible appropriate appropriate appropriate and accessible accessible and accessible accessible and accessible accessible accessible and accessible a	informed lly
(e) Participatory design and implementation  Partial  Pocus on design for cases of involuntary resettlement  Partial  Stakeholder engagement throughout the GRM's depending on project's design, planning and operational processes operational processes	
Yes Different levels; monitored by an independent verification  Yes Different levels; Monitored by an independent third party  Yes Independence, fairness, and different levels for appeals  Yes Independence, fairness, and different levels for appeals  Yes Different levels, from local to the IDB's Independent Consultation and Investigation Mechanism	able and
Yes Yes Specific procedures for services in a gender-sensitive manner No Yes Specific procedures for services in a gender-sensitive manner	
Yes Yes Yes Yes Periodic reports to stakeholders; publicly available Focus on local information and dissemination of GRM at the local level Follow-up actions February follow-up action	onses assessment FGRM is and is

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No	Yes Detailed	Yes	Yes Reported	Yes Planning, implementation; benefit-sharing	Yes Design, implementation, evaluation
No	Yes	Yes	Yes	Yes	Yes
No	Yes Three stages with reasonable time limits	No	Partial  No detailed description of procedures	Yes Three stages with reasonable time limits	Partial Principle 6.6 of the REDD+ SES may be used to guide development
No	Yes Must be publicized and accessible to communities and other stakeholders	Yes Accessible, affordable, and culturally adequate	Yes Accessible and culturally appropriate	Yes Must be accessible to all stakeholders	Yes Culturally appropriate and well communicated
No	Partial Participatory design of feedback and grievance redress procedures	Yes  Designed, reformed and implemented based on engagement and dialogue	Partial GRM is a component of the FPIC process	No	No
No	Yes Three stages with reasonable time limits, including a neutral third party and competent courts in the relevant jurisdiction	Partial Written agreements prior to parties' participation in interventions that ensure effective GRMs that are independent	Yes In cases where grievances cannot be reconciled, the GRM must identify an independent arbitrator	Yes Grievances that are not resolved shall be referred to mediation by a neutral third party	Partial Different levels for the mechanism. However, it does not mention independence, and no external interference
No	No	Yes Remedies are responsive to the diverse experiences and expectations of women	No	No	No
No	Yes The feedback and grievance redress procedure must be documented and made publicly available	Partial General principles	Yes Annual reports published and must include a summary of grievances raised and actions taken in response	Yes Procedure and documentation of disputes resolved shall be made publicly available	No

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