MINISTRY OF ENVIRONMENT AND TOURISM

REDD+ MONGOLIA
Building resilience, livelihoods and economy

MONGOLIA'S NATIONAL REDD+ SAFEGUARDS FRAMEWORK

November 2018

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Disclaimer

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Contact

Dr Oyunsanaa.B, Director General, Department of Forest Policy and Coordination, Ministry of Environment and Tourism. Email: oyunsanaa@mne.gov.mn

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Acronyms and Abbreviations

ALAGAC	Administration of Land Affairs, Geodesy and Cartography
CCPIU	Climate Change Project Implementation Unit
COP	Conference of the Parties
CSO	Civil Society Organisation
DCCIC	Department of Climate Change and International Cooperation
EIA	Environmental Impact Assessment
EIC	Environment Information Centre
FRDC	Forest Research and Development Centre
FRL/FREL	Forest Reference Level / Forest Reference Emissions Level
FUG	Forest User Group
GRM	Grievance Redress Mechanism
MECC	Ministry of Environment and Climate Change
MET	Ministry of Environment and Tourism
M&E	Monitoring and Evaluation
NEMA	National Emergency Management Authority
NGO	Non-government Organisation
NS/AP	National Strategy and Action Plan
NSO	National Statistical Office
PaMs	Policies and Measures
PLRs	Policies, laws and regulations
REDD+	Reducing Emissions from Deforestation and Forest Degradation and the role of conservation, sustainable management of forests, and enhancement of forest carbon stocks
SDGs	Sustainable Development Goals
SEA	Strategic Environmental Assessment
SIS	Safeguards information system
SOI	Summary of Information
SSIA	State Specialised Agency for Inspection
TWG-S&SIS	Technical Working Group on Safeguards and SIS
UNEP-WCMC	UN Environment World Conservation Monitoring Centre
UNFCCC	United Nations Framework Convention on Climate Change
UN-REDD	United Nations Collaborative Programme on Reducing Emissions from Deforestation and forest Degradation (REDD+) in developing countries

Executive Summary

This document sets out the main elements of Mongolia's national framework on safeguards for REDD+. International safeguards requirements for REDD+ aim to ensure that any social and environmental risks are minimized and benefits are enhanced. Parties to the United Nations Framework Convention on Climate Change (UNFCCC) agreed a set of seven safeguards for REDD+ at the 16th Conference of the Parties (COP16) in Cancun, Mexico, covering broad social, environmental and governance principles. A national approach to the REDD+ safeguards allows a country to contextualise these safeguards and meet these requirements in a way that accords with national goals and circumstances, making full use of existing systems in the country.

The development of Mongolia's safeguards framework has included the following key steps or elements:

1. **Defining goals and scope for the national safeguards framework**
2. **Assessing the potential benefits and risks of proposed REDD+ policies and measures**
3. **Reviewing safeguards relevant policies, laws and regulations**
4. **Clarifying what the Cancun safeguards mean in the Mongolian context**
5. **Assessing options for a REDD+ Grievance Redress Mechanism (GRM)**

In addition to detailing how these steps were carried out, this document summarises the outputs and the recommendations made under each of these key elements. Links to full reports are provided wherever possible. The design for a Mongolia safeguard information system is covered in the separate report 'Mongolia's REDD+ Safeguard Information System: Proposed Structure, Functions and Roles'.

This document concludes with some final recommendations on further developing the national safeguards framework and ensuring its integration in future REDD+ implementation in Mongolia. These include recommendations emerging from the steps taken to develop the safeguards framework, as well as more general recommendations:

- Information on the potential benefits and risks identified for the proposed REDD+ policies and measures, as well as the suggested measures to enhance benefits, reduce risks and improve how safeguards issues are addressed, should be integrated into several key aspects of the REDD+ National Program in Mongolia: the design of REDD+ policies and measures; the monitoring framework; and the Safeguard Information System (SIS).
- The results of the PLR review have fed into a number of subsequent processes, including through a set of recommendations submitted to the Ministry of Environment and Tourism for consideration in their review of environmental legislation in 2018. Critical PLR gaps identified through this process should be tracked through upcoming amendments to environmental and other legislation; remaining gaps that are not covered in PLR reforms or require quicker solutions may require other measures.
- Mongolia's national safeguards clarification was finalised in 2018, taking the Cancun safeguards as its principles and presenting a set of national safeguards elements to clarify their content for Mongolia. These elements were also mapped against IFC performance standards. As Mongolia's wider REDD+ implementation approach is evolving, the safeguards clarification can be considered a 'living' document, and should be reviewed and revised as necessary as REDD+ implementation proceeds in Mongolia.
- A future REDD+ GRM should draw on Mongolia's three existing national GRMs. However, prior to implementation, it is recommended that additional assessments be carried out to determine

the extent to which these GRMs meet the needs of the REDD+ process and are consistent with international best practice.

- The wider REDD+ implementation context in Mongolia has not yet been fully determined, and how this initiative moves forward in the future has implications for the national safeguards framework. For example, key factors to consider are: how will REDD+ be coordinated and implemented at national level; and whether subnational implementation is envisaged. Sufficient resources and mandates to apply and monitor the safeguards should be integrated into these implementation arrangements.

- Future activities proposed for inclusion in the REDD+ National Program include: Develop guidance document and provide training on applying and monitoring Mongolia's safeguards framework, for use by REDD+ implementing agencies at national and subnational levels; ensure that indicators and processes for monitoring and evaluating the application of the national safeguards framework are integrated into the REDD+ National Program; and make sure that training on safeguards, social inclusion, GRM, etc., are included in proposed REDD+ capacity building activities.


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1. A National approach to the REDD+ safeguards

International safeguards requirements aim to ensure that any social and environmental risks of REDD+ activities are minimized and that the benefits are enhanced. A national approach to the safeguards allows a country to meet these international requirements, such as the UNFCCC's Cancun safeguards or other relevant safeguards in a way that accords with national goals and circumstances, and makes full use of existing systems in the country.

1.1 The Cancun safeguards

To ensure that environmental and social risks associated with REDD+ are addressed and that multiple benefits can be achieved, Parties to the UNFCCC agreed a set of safeguards for REDD+ at the 16th Conference of the Parties (COP16) in Cancun, Mexico[1]. These are known as the Cancun safeguards, and constitute seven broad principles. They are presented in Box 1.

Box 1: The Cancun Safeguards

When undertaking [REDD+] activities, the following safeguards should be promoted and supported:

(a) That actions complement or are consistent with the objectives of national forest programmes and relevant international conventions and agreements;

(b) Transparent and effective national forest governance structures, taking into account national legislation and sovereignty;

(c) Respect for the knowledge and rights of indigenous peoples and members of local communities, by taking into account relevant international obligations, national circumstances and laws, and noting that the United Nations General Assembly has adopted the United Nations Declaration on the Rights of Indigenous Peoples;

(d) The full and effective participation of relevant stakeholders, in particular indigenous peoples and local communities;

(e) That actions are consistent with the conservation of natural forests and biological diversity, ensuring that the [REDD+] actions are not used for the conversion of natural forests, but are instead used to incentivize the protection and conservation of natural forests and their ecosystem services, and to enhance other social and environmental benefits*;

(f) Actions to address the risks of reversals;

(g) Actions to reduce displacement of emissions.

** Taking into account the need for sustainable livelihoods of indigenous peoples and local communities and their interdependence on forests in most countries, reflected in the United Nations Declaration on the Rights of Indigenous Peoples, as well as the International Mother Earth Day*.

[1] Paragraph 71 of Decision 1/CP.16

According to the relevant decisions of the UNFCCC, countries implementing REDD+ should meet three main safeguards requirements[2]:

I. Promote and support the Cancun safeguards throughout the implementation of REDD+ actions, regardless of the source and type of funding;
II. Develop a system for providing information on how the Cancun safeguards are being addressed and respected (i.e. a safeguards information system, SIS); and
III. Provide summaries of information on how all the Cancun safeguards are being addressed and respected throughout the implementation of REDD+ actions.

1.2 Other relevant safeguard requirements

Applying the seven Cancun safeguards is a basic requirement for countries to be eligible for results-based payments under the UNFCCC. However, if Mongolia wishes to encourage international investment in REDD+ from a range of sources, it may need to consider meeting the Cancun safeguards and UNFCCC requirements as well as any other international safeguard standards relevant to the source of funding.

For example, the Green Climate Fund (GCF) is a potential investor in REDD+ initiatives and has, as an interim measure, adopted the International Finance Corporation (IFC) Environmental and Social Performance Standards as part of its framework for REDD+ results-based payments[3].

Other potential financiers of REDD+ and related climate change initiatives in Mongolia may include development banks such as the Asian Development Bank and the World Bank, which also have safeguards standards. For example, projects funded by the World Bank are required to meet the safeguards obligations specified in the Bank's Operational Policies. World Bank-funded project proposals are categorized according to risk, and individual Operational Policies are triggered when relevant.

1.3 Components of a national approach

There is a recognition that REDD+ safeguards approaches need to be designed to meet the unique needs and circumstances of specific countries. Components of a national approach to safeguards include three core elements:

I. Policies, laws and regulations in the country that address the safeguards;
II. Institutional mandates, procedures and capacities to ensure that the safeguards are being respected; and
III. A safeguards information system that makes information available on how REDD+ safeguards are being addressed and respected.

While national circumstances vary greatly, some generic steps that are useful for developing a country's safeguards approach are becoming clear as a result of country experiences to date. Figure 1 presents these steps; more detailed explanation of what these steps have entailed is provided in the following sections.

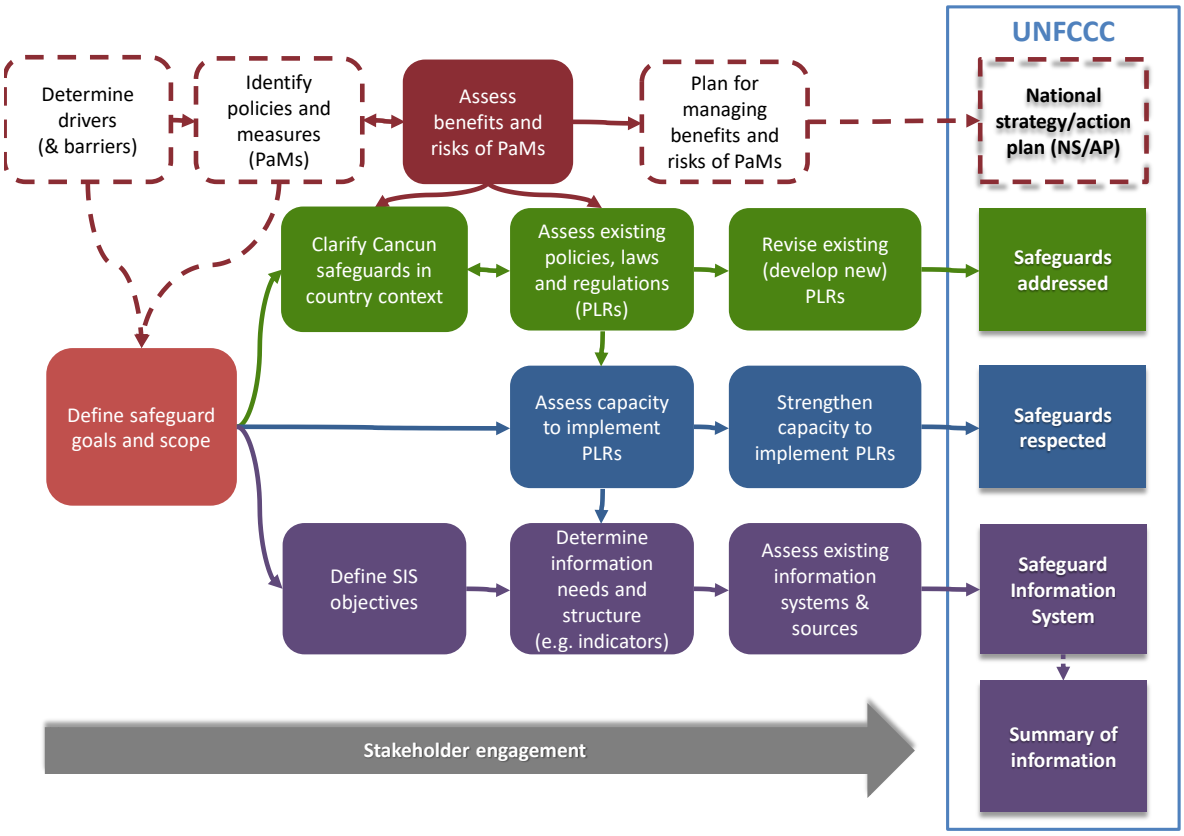
Such an approach can be beneficial for several reasons. It allows a country to consider what the international frameworks on safeguards mean in the national context and how they are to be applied. In addition, a national approach to safeguards can assist with setting nationally appropriate safeguards goals, e.g. contributing to national sustainable development goals. By doing this, it can foster greater confidence in REDD+ domestically, giving it more traction. A nationally-specific safeguards approach

[2] UN-REDD Programme Safeguards Coordination Group (2016) Concept brief: Country approaches to safeguards. Technical Brief 02. UN-REDD Programme, Geneva. http://bit.ly/CASgds
[3] UN REDD 2016. REDD+ Academy Learning Journal, 2nd Edition. REDD+ Safeguards under the United Nations Framework Convention on Climate Change.

also helps to ground safeguards work in the priority benefits, risks and issues identified in the country and can thus contribute to the design of more sustainable REDD+ policies and measures (PaMs).

Moreover, being based on existing frameworks and systems, developing a national approach to safeguards can be an efficient means to contribute to long term governance improvements. There may be opportunities to apply the approach or framework in other sectors relevant to REDD+ beyond forests, such as agriculture and energy. It also assists in the development of more efficient safeguard information systems, based on information needs, functions and institutional arrangements that are relevant and specific to the country.

Figure 1: A conceptual framework for country approaches to safeguards[4]



2. Methodology to develop Mongolia's national safeguards framework

Mongolia has used a step-wise and iterative method, based on the country approach to the safeguards, to develop its REDD+ safeguards framework. It builds on existing policies, laws and regulations (PLRs), institutions and information systems as far as possible, and allows Mongolia to meet international safeguards requirements, in harmony with national goals. It has involved the consultation and participation of stakeholders at national and sub-national levels, and is strongly linked to the design of REDD+ PaMs and the development of the REDD+ National Program.

[4] This diagram and more background information is available in: UN-REDD Programme Safeguards Coordination Group (2016). Conceptual framework for country approaches to safeguards. UN-REDD Programme Technical Brief No. 2, February 2016.

The main outputs of the process to develop the national framework are: the integration of benefits, risks and measures to enhance benefits/reduce risks into the REDD+ National Program; the assessment of safeguards-relevant policies, laws and regulations; and the clarification and validation of REDD+ safeguards in the Mongolian context. The design and validation of a national safeguard information system (SIS) is covered in a separate report on the SIS (available at www.reddplus.mn).

The development of Mongolia's safeguards framework has consisted of five main steps, which are described in detail in the following sections of this report:

Step 1: Determining safeguards goals and scope

Initial definitions of goals and scope for the safeguards were discussed and agreed with stakeholders, guiding further development of the national framework.

Step 2: Assessing potential benefits and risks of REDD+ Policies and Measures (PaMs)

Through participatory processes led by the Technical Working Group on Safeguards and Safeguard Information System (S&SIS TWG) and involving a variety of stakeholders and sectors, analyses were undertaken of the potential environmental, social and governance risks and benefits of the proposed PaMs. These analyses have fed into the development of the REDD+ National Program, and further development of the safeguards framework, and formed the first step in identifying appropriate content for the SIS.

Step 3: Reviewing policies, laws and regulations (PLRs)

A country's existing PLRs can form the basis of its safeguards framework, particularly determining how safeguards are addressed. The review covered Mongolian PLRs that may be relevant for both promoting the environmental and social benefits of proposed REDD+ PaMs, and dealing with possible risks. It also highlighted gaps in the PLR framework and made recommendations; the outcomes of the PLR review fed directly into the clarification of the REDD+ safeguards in the country context.

Step 4: Clarifying the safeguards in the Mongolian context

A national clarification of the safeguards was undertaken through a participatory process, led by the TWG-S&SIS. A safeguards clarification explains what the principles of the REDD+ safeguards mean in the national context and uses terms that are understood and accepted by national audiences. It identifies priority issues – for example, which environmental and social benefits of REDD+ are most important in the country – and is linked to the existing framework of PLRs.

Step 5: Assessing options for a REDD+ Grievance Redress Mechanism (GRM)

GRMs are systems and resources established by national or subnational government agencies to receive and address concerns about the impact of their policies, programmes and operations on external stakeholders. A review of existing GRMs in Mongolia was carried out, and recommendations made for the development of a future REDD+ GRM.

3. Determining safeguards goals and scope

Meeting the Cancun safeguards, and regularly providing information on performance against them, are requirements under the UNFCCC that will necessitate a national approach, using or adapting existing governance arrangements (PLRs, institutions, information systems, etc.) to address and respect the safeguards. The national approach can also be tailored to cover other safeguards requirements relevant to the country. Defining safeguards goals refers to determining which safeguards a country seeks to apply to REDD+, while deifying the scope refers to determining what the safeguards should be applied to, e.g. the type of REDD+ activities and the scale of implementation.

3.1 Goals and scope for Mongolia's safeguards framework

Agreeing the goals and scope for Mongolia's safeguards framework can be considered a work in progress; an initial definition was developed in 2017. This may evolve further with the development of the REDD+ National Program and improved understanding of potential funder requirements for REDD+ finance.

The draft goals and scope were discussed with Mongolia UN-REDD National Programme staff and stakeholders, including at a Safeguards and Social Inclusion Workshop in January 2017[5] , attended by around 50 participants from government, civil society organisations, industry associations, forest user groups (FUGs), and international agencies. The initial goals and scope formulated following this workshop were also reviewed by the TWG-S&SIS in May 2017. These discussions highlighted the following elements:

- Safeguards goals: to meet UNFCCC Cancun safeguards requirements, with reference to requirements for key climate finance initiatives relevant to Mongolia, such as the IFC Performance Standards used by the Green Climate Fund.
- Safeguards scope: to apply to all REDD+ activities and PaMs in the REDD+ National Program, taking into account the Program's multiple objectives for climate change mitigation, adaptation to climate change, and support for 'green development'.

Participants at Jan. 2017 safeguards workshop
Photo ©UNEP-WCMC

[5] Workshop report and material: English

4. Assessing Benefits and Risks of REDD+ Policies and Measures

4.1 Introduction

While the main purpose of REDD+ is to contribute to global climate change mitigation, it also has the potential to deliver additional social and environmental benefits. Social benefits from the implementation of REDD+ policies and measures (PaMs) may include improved livelihoods (e.g. by providing alternative sources of income or access to forest products), and improved governance of natural resources. Potential environmental benefits can be protecting or enhancing habitat for biodiversity, and other ecosystem services such as water regulation and soil erosion control. REDD+ PaMs could also pose certain risks depending on where and how they are implemented. Environmental risks may include the shift in pressures on natural ecosystems to areas not involved in REDD+ (also known as displacement or leakage), and the conversion of natural forest or other ecosystems to tree plantations. Social risks could include reduced access to forested areas or resources by forest-dependent communities and limited participation of appropriate stakeholders in the REDD+ process.

The assessment of the possible social, environmental and other impacts of proposed REDD+ PaMs helps to inform the design of a national approach to safeguards that addresses the most relevant benefits and risks of REDD+ in the national context. It also provides valuable inputs to the process of selecting and designing the PaMs that are to be included in a National REDD+ Strategy or Programme, in order to increase their social and environmental sustainability and highlight areas where risks may need to be managed.

4.2 Approach for assessing benefits and risks

Mongolia undertook a participatory process during 2017-2018 to identify the potential benefits and risks of REDD+ implementation and recommend measures to enhance priority benefits and reduce priority risks. This process has involved a number of steps:

- A participatory process at the national level to identify likely benefits and risks of REDD+, as well as measures to address these[6];
- A discussion of the potential benefits and risks at the aimag level, during the development of subnational REDD+ action plans in Khentii, Khuvsgul and Selenge aimags;
- Inclusion of any additional benefits and risks from further discussions PaMs into the full analysis and recommendations, and final review[7];
- An assessment of the potential impacts of national-scale, policy-level PaMs, led by the TWG-S&SIS[8].

The results of this assessment process were fed back to the Mongolia UN-REDD Programme and stakeholders, in order to inform the further design of the PaMs and the national safeguards framework. The full results, including assessment tables and background report are available online (Background report: English, Mongolian; Assessment tables: English, Mongolian)

[6] National benefits and risks assessment workshop, May 2017 (Workshop material: English, Mongolian)
[7] Presentation of outcomes of benefits and risks assessment, at meeting of the TWG-S&SIS, January 2018. (Meeting report: English, Mongolian).
[8] Assessment of policy-level PaMs at meeting of the TWG-S&SIS, September 2017 (Meeting report: English, Mongolian)

4.3 Results

A summary of the benefits and risks identified through the assessment process is provided in Table 1 below. Prominent benefits that emerged from the assessment include: increased employment and income generation opportunities for local people; increased contributions to state revenues, particularly to local budgets, from the forest sector; the promotion of natural and other types of forest regeneration; improved forest sector governance, such as improved planning, regulatory framework and monitoring; and maintenance and enhancement of ecosystem services from forests, especially related to soil and water conservation. Prominent risks include: risks related to corruption, favouritism and mismanagement; lack of participation by local people in REDD+ planning and implementation; displacement of pressures on forests to other forest areas and/or other ecosystems, e.g. to grasslands; unsustainable and/or illegal harvesting of forest products, particularly for timber and fuelwood, leading to negative effects on biodiversity and ecosystem services; and frequent changes in policies and public officers/staff, an operational risk which may also affect the sustainability of REDD+ PaMs and heighten risks of reversals. The full list of identified benefits and risks is summarised below in three categories: environmental; socio-economic; and governance. Operational risks – i.e. risks to the effective implementation of REDD+ - are presented separately at the end of the table.

Forests are important for local livelihoods in Mongolia
Photos © Cory Wright

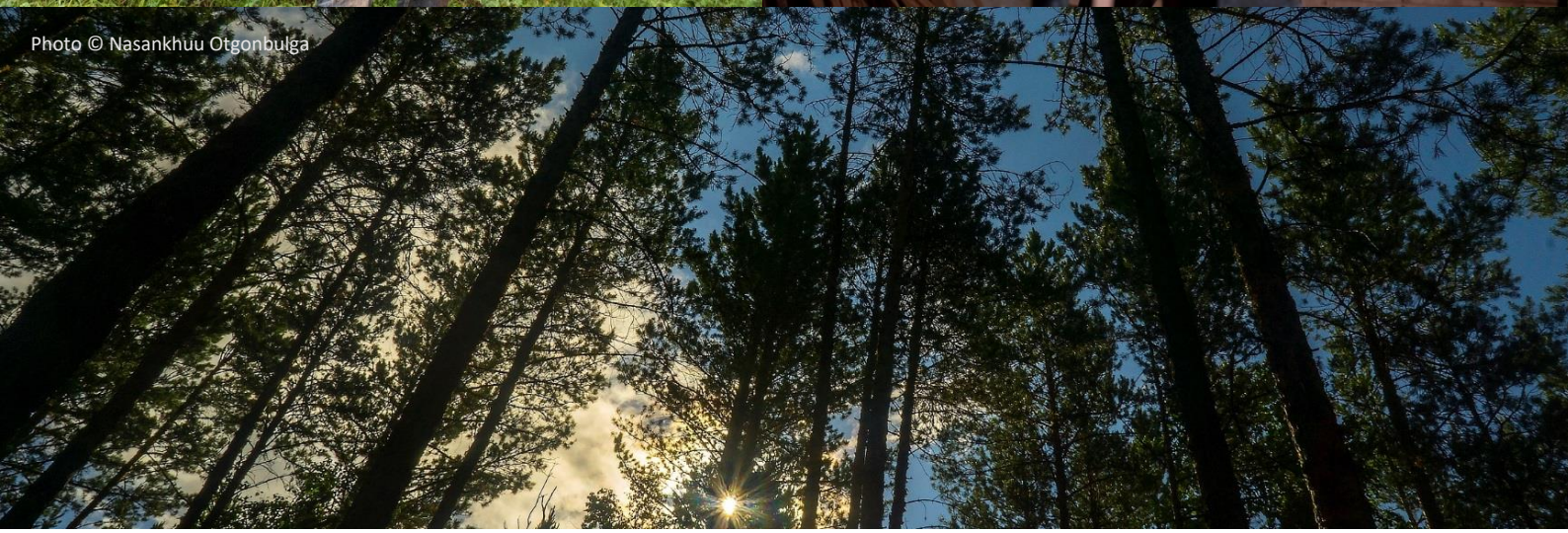


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Table 1: Summary of results of Mongolia REDD+ benefits and risks assessment

Environmental	Socio-economic	Governance
Benefits identified	**Benefits identified**	**Benefits identified**
Through improved restoration activities, improved seed quality and monitoring, forest growth and productivity, forest quality and natural regeneration could increase.	Income and livelihoods of local communities, forest user group members and economic entities could improve, e.g. through more opportunities to utilise forest resources.	Local governance and public engagement in protected area and forest management can be improved; forest user group involvement can improve forest protection, reduce fire risk.
Forest restoration and conservation and water source protection PaMs may lead to improved provision of ecosystem services and biodiversity conservation.	Sustainable management of forests and measures to reduce fire risks/impacts could support local infrastructure development (e.g. forest roads); improved economic incentives for sustainable forest management may result in increased investment in forest-dependent areas.	Improvement of legal/planning framework for sustainable forest management, and better implementation of sustainable forest management plans by forest user groups; can also strengthen capacity and understanding of officers and local people on sustainable forest management.
Fire and pest risks could be reduced, due to deadwood removal/thinning; forest roads can support fire management and pest control activities.	Production and supply of value-added products may increase, with possible price premium for high quality/sustainable products.	Forest monitoring processes may improve, e.g. if more revenue available for monitoring; database on certification could be established.
Through working with Forest User Groups, Forest Units and other stakeholders, capacity for sustainable forest management could be improved.	Wood supply may increase and prices of products may be stabilized due to more reliable/sustainable supply of raw materials.	Increased stakeholder participation may improve governance of forest restoration and pest control activities, such as monitoring, transparency, and fund allocation.
Desertification and land degradation may decline due to reduction in forest degradation.	Knowledge and skills of forest user-groups and other stakeholders could be improved through support for developing forest management plans, capacity-building opportunities, etc.	Increased stakeholder participation may reduce funding burden for National Emergency Management Authority and Protected Area administrations.
Through improvements to natural resource fees allocation and management and payments for ecosystem services (PES), financing for environmental conservation and management at local level may be increased.	Increased availability of water resources may provide opportunities for other economic sectors to develop (e.g. agriculture) and improve food security.	With better monitoring and law enforcement, reporting on illegal logging and other violations of laws could be quicker and more efficient; associated crime may also be reduced (e.g. tax fraud, wildlife trade).
Improved pasture land management could allow grassland to regenerate, reducing land degradation. Intensified livestock farming could develop.	Economic activity and resources of cooperatives may increase, contributing to local development funds. SMEs bolster income flows to the local budget through taxes, permits and loan repayments.	REDD+ PaMs (e.g. improved enforcement to reduce illegal logging) may foster cooperation between different Mongolian government agencies, as well as with neighbouring countries on forest and environmental issues.

Conservation and regeneration of traditional attitude to nature among local communities could be encouraged through incentives for forest protection and management.	Promotion of 'green' and higher quality wood products could have a positive effect on human health (e.g. low smoke fuel products).	Better management and allocation of conservation funds could improve confidence and payments by payers of natural resources tax
Increased environmental protection in dryland forest ecosystem areas could lead to saxaul regeneration; this could also stimulate the growth of other plants (e.g. medicinal herbs).	Interventions in the livestock sector may help to improve livestock product quality, contributing to increased exports.	Transparency of income and expenditure may be improved, especially at local level; improper spending of revenues could be more quickly identified and stopped. Corruption related to tenders may decrease through increased participation of stakeholders in forest sector activities.
The promotion of sustainable fuelwood harvesting may help to improve fuelwood practices, including alternative fuel sources, energy saving, reduced pollution.	Diversification of livelihoods and improved ecosystem service provision from agroforestry may increase climate change resilience of local communities.	REDD+ PaMs related to non-timber forest products provide opportunity to improve legal framework, sustainability of harvesting, and law enforcement related to NTFPs.
Introduction of improved timber processing technologies could lead to better raw materials utilisation/decreased waste; waste management may improve, with better logistics and cooperation in industrial centres.	Sustainable forest management and certification could lead to improved techniques and technologies and greater efficiency; standards of labour protection, health and safety could also be improved.	Collaboration and linkages between different stakeholders could improve, e.g. reducing conflict between forest user groups and economic entities.
Risks identified	**Risks identified**	Promotion of agroforestry may improve cooperation between forest, agriculture and land management units.
Increased deadwood removal and/or thinning in production forests could lead to over-harvesting of natural resources, and illegal harvesting, with negative impacts on forest health, biodiversity and ecosystem service provision, e.g. carbon storage, wildlife habitat.	Livelihoods of local communities could be negatively impacted e.g. due to higher protection levels restricting access to natural resources, less land available for public use and grazing, or restrictions on hunting/deadwood collection	**Risks identified**
Controlled fires for reducing fire risk/impacts may get out of control, or fire-setting be displaced to other areas, e.g. where there is lack of awareness or less patrolling.	Conflicts and disputes could arise between different groups, e.g. over land and forest resource utilisation or distribution of incentives/benefits.	Corruption may increase at a range of levels.
		Information/awareness campaigns may not reach target groups (e.g. in remote areas).

Improved pest control may affect ecological balance; unclear risk to wildlife from mechanical collection and biocontrol methods.	Workload and responsibilities of local citizens may be increased through participation in REDD+ or restrictions on livelihoods.	Frequent changes in policy and planning due to political affairs creates risk of reversals.
Risks of displacement of emissions, such as: improved protection/management in some forest areas shifting drivers/pressures to other forest or non-forest areas; non-forest ecosystems may suffer negative impacts if lower priority for protection; fuelwood harvesting may increase in areas without alternatives or harvesting restrictions.	Promoting pest control activities may lead to increased costs to state budget; government and private sector may have interest in increasing budget allocation for pest control for their own economic interests.	Penalties for non-survival of seedlings or poor results could make people lose trust/become less active in forest restoration activities.
If increased effectiveness of tree planting encouraged more planting, natural forest types could be lost or plantations established in inappropriate areas (e.g. grasslands).	Risks of placing a large future burden on state budget, e.g. infrastructure and equipment (e.g. forest roads) that needs to be maintained, increased budget for planting and maintaining forest regeneration especially in saxaul areas, cost of developing eco-tourism in remote areas, etc.	Creation of new protected areas may place pressure on local government and protected area administrations, and may weaken cooperation between them (as PAs are under national level).
Improving the adaptive capacity of communities may promote measures that conflict with nature conservation (e.g. infrastructure development).	Supply of wood and fuelwood could decrease with new restrictions; increased prices for such products could impact poorer people in particular.	Potential conflicts need to be managed between expanding the protected areas network and watershed management plans with other development policies (e.g. on mining, roads, pasture, energy).
Risk that microfinance or livelihood support could be used for unsustainable practices, e.g. increasing livestock numbers.	REDD+ may cause pressure on traditional way of life, such as nomadic herding; expanding protected areas may also conflict with regulations aimed at preserving traditions.	Strengthened law enforcement and emphasis on law enforcement agencies may weaken community members` participation and initiative to manage/protect forests.
If livestock production becomes more valuable, numbers may still increase, leading to pasture land degradation, especially wherever water resources are poor.	Migration within and between local areas may increase due to decrease in access to grazing areas and restricted livelihood opportunities.	If spending on conservation is increased without adequate technical support, poorly planned conservation measures may be implemented, e.g. use of monocultures in restoration, water resources infrastructure.
In areas where water resources improve, agriculture and small businesses may expand, leading to land degradation. Consumption of chemical fertilisers may increase, including from agroforestry.	Dependency on use of fuelwood or other natural resources could increase (e.g. rather than alternative energy sources or alternative livelihoods).	Less pasture land could be available for grazing, affecting wider land management; legal environment is not adequate to regulate designation/restriction of areas for pasture.

Fences/measures for protecting regenerated areas may restrict wildlife movement.	There may be insufficient or inequitable capital for, access to, or uptake among target groups of advanced techniques and technologies, e.g. alternative energy types, new wood processing techniques.	Improvement of the relationship between private sector harvesters, processers and government could exclude/limit the rights of herders, farmers and users of non-timber forest products.
Saxaul growth through environmental protection in dryland forest ecosystem areas could lead to growth in gerbils and damaging insects that feed on saxaul.	REDD+ PaMs may mainly benefit larger forestry/processing companies while smaller ones cannot compete; risk of insolvency for smaller economic entities and cooperatives from increased access to credit and pressure to adopt new technologies.	
	Risks to gender equality, e.g. job opportunities for men may increase and gender ratio will be lost.	

Operational risks to REDD+

- Climate change impacts can retard forests' natural regeneration process, affecting the feasibility of restoration PaMs.
- Agroforestry models may not suit all areas or forest types, resulting in uneven implementation and/or lack of sustainability.
- Frequent changes in policy and planning due to political affairs creates risk for sustainability of PaMs.
- If monitoring system not improved, ineffective pest control measures may be implemented and results may not be properly evaluated.
- Biological methods of pest control may be insufficient in the context of climate change

Results related to policy-level PaMs

A separate desk-based and participatory process was carried out to consider the potential impacts of proposed REDD+ PaMs that would involve policy reform at the national level. Four policy-level PaMs proposed for the REDD+ National Program were assessed:

1. Establish and apply a national standard on forest certification that meets international standards.
2. Promote consumption of wood products through a Green Procurement Strategy (e.g. for buying Mongolian wood furniture/fittings in public buildings and other sustainably sourced/local products).
3. Work with the private sector and/or banking institutions to develop an Impact Investment Fund.
4. Develop a supportive policy framework for improved resource user rights and regulations for Forest User Groups and Community Groups.

Given that such policy-level PaMs will likely be implemented at the national level, and through changes to policies and/or fiscal arrangements that will in turn change the way in which forests and other land are managed, the pathways through which they generate benefits and risks are likely to be more complex or indirect. The assessment approach used in Mongolia drew on three existing methods for assessing policy impacts:

- Transmission channels analysis: Developed by the World Bank, this approach focuses on assessing the poverty and social impacts of policy reform, by examining what impacts are likely to occur, how they are likely to be transmitted, whom they are likely to affect and when the effects are likely to play out.
- Assessment as per Mongolia's regulation on developing laws (Annex 3 of the Government Resolution #59, 2016): This regulation sets out an approach to assess the impacts of proposed new legislation. It includes 6 main criteria for assessing likely impact and some guidance on each.
- United Kingdom government regulatory impact assessments: The purpose of UK regulatory impact assessments (RIA) is to set out the objectives of a legislative proposal and analyse risks to be addressed, options for delivering the objectives, expected costs and benefits of the options for the different bodies involved, and how compliance with regulatory options would be secured/enforced. Public consultation and monitoring and evaluation criteria are also considered.

A set of questions to apply to the proposed PaMs was developed, and the assessment was carried out through an initial desk review and subsequent discussion groups at a TWG-S&SIS meeting[9]. The results are summarised below:

The four PaMs will likely result in changes to ***forest and land management practices***, which may go beyond their REDD+ objectives and in some cases conflict with them. For example:

- Increased investment and profitability in the forestry sector, and more demand for domestic wood products, may encourage a greater extent of forests to be used for harvesting, or a greater intensity of harvesting in forests already designated for production. This may be beneficial for forest productivity, but also has implications for the conservation of biodiversity and ecosystem services (see below).

[9] September 2017; more information in meeting report: English, Mongolian

- More active forest management, and potentially increased reforestation, may have impacts on other uses of forest land (e.g. grazing, collection of NTFPs and fuelwood); this could reduce forest degradation but could also negatively affect people's livelihoods. Forest economic entities and/or people who have been prevented from carrying out their usual livelihood activities in certain forest areas may seek to exploit forests in new areas, or to find opportunities for illegal exploitation. More pressure on existing pasture lands may also result.

The PaMs will also likely have long-term ***impacts on biodiversity and ecosystems***, such as:

- Increased investments in forestry and demand for wood products would lead to more active forest management and increased support for reforestation, thus enhancing forest cover and productivity. If the harvesting levels are well-judged and sustainable, forest growth may be improved (e.g. compared to a non-sustainable harvesting regime, or to degraded forest areas suffering from a lack of active management/protection). This may also have positive impacts on some forest ecosystem services (e.g. soil erosion control, water regulation). However, some elements of biodiversity, such as species associated with late stages in the life cycle of trees, or species who require deadwood as part of their habitat, may be negatively affected.
- Strong requirements related to 'green' procurement, green investments and certification would improve forest management, e.g. promotion of reduced impact logging, conservation of High Conservation Value Forest / High Carbon Stock Forest, etc., with benefits for ecosystem service provision and biodiversity. Such requirements may also encourage other improvements in environmental and social practices in the forest industry, depending on the definition of 'green'. For example, they could lead to better waste management, energy efficiency and health and safety practices for workers.
- Improved forest health and ecosystem services can in turn also contribute to greater climate change resilience for the forests themselves and for forest-dependent communities.
- However, as noted above, increased investments, profitability and demand for forest products may also lead to overharvesting and more disturbance (e.g. from roads, increased access), with negative impacts on forest ecosystems and biodiversity. If harvesting levels are exceeded, or with continued harvesting over long periods of time (even if relatively sustainable), there may be cumulative impacts on forest health, functions, biodiversity and ecosystem services, including carbon storage and sequestration.
- The displacement of herders or other forest users to new forest areas or to other ecosystems may also have negative environmental impacts, as pressures such as grazing are shifted to these areas, e.g. leading to land degradation.

In terms of ***social impacts*** on stakeholders such as communities and local people, the following were identified:

- Increased investment and profitability in the forest sector, as well as more opportunities for user groups to utilise forest resources would lead to more employment and livelihood opportunities. In addition, improved techniques and technologies in harvesting and processing could improve labour productivity, employee skills, and health and safety. Over the long-term, though, there may be some risk that increased efficiency and automation actually reduces the number of jobs in the sector.
- An improved legal framework for user rights and processes like certification may also raise the level of collaboration between key stakeholders, such as government agencies, economic entities and forest user groups.

- However, strengthened forest management and protection, as well as reforestation activities, may restrict some people's livelihoods (e.g. through reduced access to grazing areas, NTFPs, fuelwood). In addition, there may be negative impacts on consumers if there is a growing scarcity of wood products like fuelwood and prices rise.
- The PaMs may increase conflicts of interest between forest user groups, local people and economic entities; for example, some local people may feel aggrieved if they are excluded from cooperation between government agencies and forest user groups, while economic entities and forest user groups may have conflicting interests over access to forest areas. The engagement in REDD+ of citizens who are not user group members, especially young people and women, may be particularly weak or even decrease as other stakeholders become more involved. Participation in certification processes may be beyond the capacity of smaller entities and cooperatives, favouring large companies.
- Companies importing wood products may be negatively affected while domestic producers are given an advantage; particularly if the PaMs are accompanied by changes in customs fees (e.g. higher duties on imports).

The assessment of the policy-level PaMs also looked specifically at potential risks of ***reversals and displacement***:

- Risks of displacement: high/growing demand for forest products could over the long-term lead to declining resources in production forests, so that harvesting spills over into other forest areas (where it could lead to degradation), or imports from other countries increase; if herders, farmers and other resource users are prevented from accessing some forest areas, this could see them shift to other forest or non-forest areas, again with potential to lead to degradation in those areas (e.g. from over-grazing); introducing green requirements only for some markets may mean that the products from non-certified areas will continue to be sold to other markets.
- Risk of reversals: Strong demand for forest resources could lead to over-harvesting, reversing the potential carbon gains from improved forest management; frequent political turnover/instability could lead to a policy change, as could reduced budgets/increased deficits in the public sector; investment risks (e.g. defaults) in the forest sector (which currently has little engagement of financial institutions) could make a PAM like the development of an impact investment fund unsustainable over the long-term; without sufficient technical support or improved market access, costs of certification may be too high for entities to bear over the long-term, especially if price premiums or increased sales do not materialise, or if competition from less sustainable sources (e.g. in regional or local markets) is too high; the length of forest use contracts also needs to be considered, as short contract periods may make investing in certification less attractive or hard to maintain.

The last component of the assessment of the policy-level PaMs looked at the level of ***consistency with other key national policies, laws and programmes***. All four PaMs were found to be supportive of policies such as the Green Development Policy, Nationally Determined Contribution to the Paris Agreement, and State Forest Policy, as well as the Sustainable Development Goals. The following potential inconsistencies were noted:

- The expansion of certain types of harvesting from forests may conflict with some provisions of the Law on Environmental Protection. In addition, the Law on Forest may require some amendment to allow greater access to forest resources by forest user groups.

- The potential negative implications that risks of over-exploitation pose for biodiversity conservation and combatting land degradation need to be carefully mitigated and may affect Mongolia's targets under the Convention on Biological Diversity and the UN Convention to Combat Desertification (UNCCD) and their respective national programmes.
- The risks related to local livelihoods, particularly livestock herding, should also be further explored and addressed, in the context of Mongolia's socio-economic development targets, Green Development Policy targets on pasture land, as well as policies on the maintenance of traditional lifestyles.

4.4 Recommendations

The work on assessment of REDD+ benefits and risks included the identification of measures to enhance priority benefits and reduce priority risks. Based on this, recommendations for the REDD+ National Program and the further development of the PaMs were drawn up. These recommendations cover steps that should be undertaken before REDD+ implementation begins, considerations for the design and implementation of PaMs, and other aspects, such as links between PaMs and legal reforms. In addition to integrating the recommended measures into PaMs design and implementation, their application in practice should also be tracked in monitoring frameworks for REDD+, including the SIS.

A selection of key recommendations is summarised in Table 2 below, based on the detailed recommendations that have been prepared for each PAM.


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Table 2: Summary of recommendations from the benefits and risks assessment

Measures to be taken before REDD+ implementation
• Several PaMs envisage an increase in the extraction of deadwood and other wood products. It is recommended to compile and present evidence on **the long-term impacts of changes in extraction rates that are comparable to the ones proposed,** in order to help make a clear case for the PAM (or carry out assessments of the likely impacts, e.g. based on comparisons with other boreal forest areas, if actual evidence is not currently available)[10]. This would help to ensure that the nature of the proposed extraction regime is comprehensively understood, as well as the likely implications for carbon and non-carbon benefits and potential risks, and would allow to develop measures appropriate to Mongolian forests. This measure should include assessing: the projected increase in extraction; the potential positive and negative impacts on carbon stocks over the long-term; and the potential impacts on biodiversity, ecosystem services, and socio-economic benefits from forests.
• In order to enhance ecosystem-related benefits (e.g. improved ecosystem service provision and biodiversity conservation) and reduce risks (e.g. impacts on peatlands, water resources and other priority areas), before PaMs are implemented or expanded, **assessments** should be conducted to **determine and prioritise suitable sites** where PaMs can best achieve key ecosystem benefits and minimise negative impacts. Spatial analysis as well as consultation with local communities can help to highlight areas that are important for ecosystem services, wildlife habitat, and other factors. Attention needs to be paid to potential impacts on non-forest ecosystems (such as grasslands, wetlands, and peatlands) as well. A multi-stakeholder exercise to identify and validate priority ecosystem services for REDD+ could be built into this assessment.
• **Environmental and social impact assessment** including cost-benefit analysis should be considered for some PaMs, in line with regulations (e.g. EIA Law), especially for those PaMs that are new to Mongolia or have not been assessed before (e.g. PES schemes, Forest Cleaning Programme); this should include the potential socio-economic impacts on local people, such as loss of access to natural resources, and other relevant stakeholders (e.g. the private sector). Tools such as Strategic Environmental Assessment (SEA) may be useful in assessing the cumulative impacts of PaMs. Any local plans/agreements developed to implement PaMs should then incorporate environmental and social aspects.
• In order to reduce negative impacts and promote the benefits of **proposed infrastructure development** (e.g. forest roads), EIAs should be conducted. A cumulative impact assessment or strategic environmental assessment should be considered for road networks as a whole (e.g. in large/connected forest areas), and maintenance needs should be taken into account. Spatial assessments should be conducted to identify impacts of forest roads built in the past: have they resulted in less degradation, in particular related to fire? If possible, road location and design should seek to maximize different criteria: suitability for fire control, pest reduction, sustainable forest management, and community use. Monitoring of these activities and road impacts should also be incorporated into REDD+ monitoring.
• Numerous risks have been identified regarding **conflict and loss of rights to access forests and forest resources**, including for grazing. For REDD+ PaMs that may affect access to forests and grazing areas, the resources and user groups that will be involved and/or affected should be identified. The feasibility of aligning forest

[10] A rapid and non-systematic review of existing literature shows that few studies are available in English on the management of boreal forests, and in in particular for Mongolia. The effects of boreal forest management are site specific and the effects of forest clearing and thinning can therefore not be easily anticipated. Research from other boreal forest areas suggests that impacts on biodiversity are species-specific, with some species responding positively while others may be affected negatively. Forest cleaning and/or thinning does appear to reduce the risks of pest damage and forests fires, depending on the specific techniques used. There is also some evidence for positive socioeconomic impacts of these management practices, but they also could unintentionally result in additional stress and anthropogenic pressure on boreal forests. Carbon pools might increase after an initial decrease of net production.

resource rights with grazing resource rights should be assessed, to avoid/reduce displacement and conflict. There should be a negotiation with the participation of all relevant stakeholders, with consensus reached, before proceeding with PaMs that will affect such rights.

- Another type of assessment has been suggested for PaMs related to natural resource tax allocations. Existing **financial flows for conservation** should be mapped, showing how revenues are currently sourced and spent. This should also consider likely future sources of revenue generated from natural resource taxes, as well as a needs assessment for conservation, i.e. where allocations could be spent most effectively.
- An understanding of the **climate change resilience of the PaMs** will also be valuable. An assessment of local climate change vulnerability and the potential for climate change impacts to negatively affect PaMs is relevant for activities on pasture and livestock management, community development and adaptation, forest restoration, pest control and fire prevention and control. Given the climate change projections for Mongolia, these interventions should be designed to enhance resilience and avoid maladaptation. Ecosystem-based adaptation approaches should be promoted. Ongoing studies on the climate resilience of the forest sector and for the preparation of the National Adaptation Plan may contribute to building the necessary understanding.
- With regard to the proposed **impact investment fund**, an assessment should be done of the relevant legal framework for such funds, and whether existing funds/mechanisms could be adapted to better include the forest sector (rather than creating a new fund).
- **Agroforestry** is still a relatively new practice in Mongolia, and this may pose risks to livelihoods and the environment. A feasibility assessment should be carried out, looking at agroforestry experiences from other countries with similar contexts, as well as from Mongolia, and covering environmentally friendly techniques, market research on agroforestry products, appropriate species, and likely impacts of climate change. Agroforestry models need to be tailored to particular areas/regions.
- **Pest control PaMs** should be evidence-based; currently there is a lack of clear data on the effectiveness of previous/current pest control regimes. Also, to reduce the risk of negative impacts of new pest control measures and to enhance benefits, research on their potential environmental impacts and consideration of the projected impacts of climate change on pest occurrence and on pest control should be carried out. To optimise the use of limited resources and increase effectiveness, high priority regions should be identified and targeted.
- An **equitable approach to benefit sharing** or incentive distribution should be developed, building on existing mechanisms. Guidance should be provided to ensure these mechanisms are in line with the safeguards and can be monitored adequately. To reduce the risk of conflicts and mismanagement, comprehensive and transparent information must be provided to all relevant stakeholders, e.g. on how beneficiaries/sites are selected; conditions for payment of incentives/benefits; how incentives/benefits are transferred; roles and responsibilities of different actors; the distribution of incentives/benefits; and related complaints mechanisms.
- To further support local sustainable development, government should expand the number of **local development funds** that have been established and explore/mandate their use to support local activities, e.g. the development of small businesses. Financing and expenditure of local development funds should also be transparent and well monitored.
- To promote economic benefits from REDD+, particularly PaMs on processing of forest products, **assessments of market demand, market access and supply chains** should be done for key commodities/products, identifying opportunities and barriers (e.g. looking at demand for certified wood products, future markets for Mongolian timber, fuelwood supply and demand, etc.). This should be followed by the development of appropriate marketing and business plans.
- In order to enhance the expected environmental and social benefits of PaMs on procurement policy, certification, etc., and reduce risks of 'greenwashing', clear **definitions of 'green'** and 'domestic' should be developed, along with guidelines/procedures for sourcing products and monitoring green procurement (e.g. due diligence requirements, monitoring system). Possibilities to use the certification system for public procurement should be explored.

Measures to be taken during REDD+ implementation
• To maximise the benefits of the proposed PaMs on developing a **long-term sectoral plan for sustainable forest management**, certain areas of forest should be **left intact**, based on an understanding of potential impacts of thinning (see assessments recommended above). For example, the selection of forest areas to be excluded from thinning or other interventions could be based on identification of high conservation value forests (HCVF) and high carbon stock forests (HCSF); it may also be based on additional criteria important in the Mongolian context. Indicators on priority socio-economic benefits, climate change resilience, ecosystem services and biodiversity should be built into the monitoring framework for any long-term sectoral plan. • Improving the development and implementation of **forest management plans (FMPs)** (in addition to long-term sectoral planning) has been identified as essential to the implementation of a number of proposed PaMs. Few forest user groups currently have FMPs or monitor their implementation, and many lack capacity on sustainable forest management. All forest user groups and economic entities managing forests should have a forest management plan, and these plans should: ensure sustainable levels of harvesting based on proper assessment of the forest area; include indicators for forest health, ecosystem services and biodiversity; and reflect consultation with multiple stakeholders at the local level. Similarly, PaMs related to NTFPs should include development of **sustainable harvesting plans and/or quotas**, specifying the amount to be harvested by households, user groups and economic entities, as well as harvesting locations and methods, in line with sustainable harvesting levels. • Additional efforts may be needed to **expand the participation** of forest user groups, herder groups and local communities in the implementation of activities in **dryland forest ecosystems** and to ensure their sustainability. This could involve for example: establishing new user groups in target areas; assessing how to extend participation opportunities to other social groups, i.e. outside of user groups; providing training on saxaul forest management and restoration, also considering other important species, like desert cistanche and grassy plants; and advocacy/public campaigning for dryland forests. Pest control activities also need to be considered for dryland areas, as pests may increase with saxaul regeneration. • A number of proposed activities are related to or may have impacts on **water conservation**. Measures suggested to enhance their benefits and reduce risks include: considering water supply requirements in relevant areas and using water efficient technologies for forest restoration activities; capacity building for local people on water collection techniques, water efficiency, water recycling, etc.; ensuring that the monitoring framework of PaMs covers risks of overuse of water and the need for sufficient flows of water to ecosystems; and combining protection of oases with tree planting around water sources when needed. • Stakeholders have identified a need to promote **access to modern equipment and technologies** for forest units, forest user groups and economic entities, in order to enhance their participation and the potential economic benefits. For example, forest user groups currently lack equipment for fire prevention/control. Where possible, consideration of how equipment/technologies can be modernized should be included in relevant PaMs (options may include soft loans, renovating equipment, etc.), noting that technologies should also be environmentally friendly, preferably using domestically produced resources, and suited to Mongolian conditions. • To reduce risks of overharvesting and other potential negative impacts, and to ensure activities are effective, sufficient resources are needed for **monitoring**. Local forest units often lack budget and trained staff for monitoring. Opportunities to cooperate with CSOs and to use economic entities' equipment can be explored (e.g. some CSOs already play a role in environmental monitoring). Monitoring frameworks should also include indicators related to environmental and social impacts. For example, microfinance and other livelihood interventions need to be comprehensively monitored, including against social and environmental indicators. • **Information flows** between government agencies, forest user groups and local communities need to be strengthened and appropriate channels used to reach remote areas; information on topics such as conservation regulations and fire risk levels, as well as on REDD+ implementation, should be shared regularly and transparently.

- To enhance benefits related to **more sustainable energy use** and reduce risks of dependency on, and over-extraction of, fuelwood, PaMs addressing fuelwood use should be linked to support for alternative energy options, such as solar energy, gas, biofuels, etc., and leverage existing government programmes**.** Attention also needs to be paid to fuelwood distribution (only some areas currently have fuelwood markets). Fuelwood access for disadvantaged families could be supported by contracting economic entities or FUGs for the purpose of distribution. In addition, a clear understanding of how changes in energy use are likely to **affect GHG emissions** is also needed.
- To strengthen capacity for REDD+ PaMs on sustainable forest management and processing of forest products (including for NTFPs), **capacity-building and training** need to be built into the PaMs, particularly for forest user groups, forest units and economic entities. Cooperation with vocational and technical education (VTE) centers to deliver training programmes should be explored.
- In order to improve the effectiveness of PaMs related to **protected areas**, management regimes and capacity need to be strengthened. This can be achieved by increasing budget allocations for protected area management, and staff capacity building. Other suggestions include: expanding the use of SMART software application for protected area administration and monitoring; and training on climate change adaptation and livelihoods for local government and PA administrations.
- A number of PaMs aim to improve the **provision of incentives** for forest protection, management and broader conservation. To effectively increase participation in patrolling and reporting (e.g. of illegal logging), payments may need to be increased but in-kind contributions (like petrol, fire extinguishers and other equipment) can also be used. Confidentiality in processing reports and transferring incentives in these cases needs to be ensured. It is important to avoid tying funding to fines/sales of seized timber (as this can encourage authorities to allow illegal logging to continue in order to maintain an ongoing source of funding).
- A publicly monitored **forest rehabilitation fund** should be considered; this fund could provide incentives for forest restoration, and better maintenance and protection of restored areas. No fund like this exists in Mongolia at the moment. Another option to reduce the burden of increased forest restoration activities is to improve uptake of the **'buy back' scheme**, whereby economic entities and citizens can plant trees and receive reimbursement from the government after 5 years for trees that survive. To promote participation in forest restoration, other methods than simply applying penalties for poor performance should be explored.
- Several PaMs will also require the development or improvement of detailed **guidelines, standards and criteria** for their implementation. For example:
    - Technical guideline on how to properly carry out fire prevention measures such as controlled burns;
    - Standards and quality control guidelines for priority forest products (with Ministry of Agriculture and Light Industry);
    - Guidelines/standards for sustainable forest management and certification, considering site selection, stakeholder consultation/participation, social and environmental criteria, and the role of the National Council of Certification & Accreditation;
    - Revised guidance for developing forest management plans, as this is outdated and should include requirements for more detailed analysis of forest areas;
    - Guidelines and criteria for the design and delivery of livelihood support/microfinance activities to ensure access for marginalised groups, support small-scale, local production, and to prioritize eco-friendly and socially responsible products and practices;
    - Rigorous standards for ecotourism addressing social and environmental aspects, such as pollution, social impacts, biodiversity, benefit-sharing, etc.;
    - Strict and clear social and environmental guidelines for investments for the impact investment fund with a framework for assessing compliance by borrowers;
- Better compliance with national logging standards should be promoted.
- To enhance economic benefits, reduce risks to livelihoods and address land degradation, opportunities should be sought to provide incentives for participation in REDD+ to **pasture user groups** and to intensify action on **improving health of livestock**, including through improved veterinary standards, and meet international export requirements for livestock products. Explore opportunities to link to existing projects and extension services (e.g. National Programme on Improving Livestock Quality and Breeds).

- Currently, **local level participation** in the type of activities set out in the proposed PaMs is restricted to certain bodies (e.g. forest user groups, Buffer Zone Councils) and can be improved. To enhance local level participation, consultation is needed with social groups at risk of exclusion, such as women and youth; if needed, targets/methods should be developed to increase opportunities for their participation. Participation of forest and pasture user groups in **land use planning** should be strengthened, and a mechanism should be developed to combine their inputs – e.g. by allowing herders/communities to contribute to forest management plans, and by involving FUGs in the development of pasture management plans. **Buffer zone councils** are a requirement of the Law on Buffer Zones for national PAs. However, the structure of these councils should be made more inclusive, and they need to be established for new protected areas (and appropriate structures developed for non-national level PAs, if possible).
- To address risks related to the **health and safety** of people involved in PaMs (e.g. in wood processing or pest control activities), provision of adequate equipment should be ensured, and health and safety procedures respected; if such procedures do not exist, they should be developed.
- REDD+ PaMs offer opportunities to improve **information collection and transparency**, supporting better forest governance at local and national levels. For example, by improving monitoring protocols for forest user group activities, pest control, etc., and setting up a forest certification database. Parameters important for guiding forest management and the application of REDD+ safeguards should be integrated into information collection processes and databases, and information should be made available for use by government agencies as well as shared with stakeholders. In addition, a database of forest-related legal violations/incidents should be established.
- The implementation of **integrated water resource management** (IWRM) should be promoted in selected river basin areas (currently only in Selenge River). Watershed management plans should be based on a thorough situation assessment, then integrated with land use plans and protected area management plans. To maximise ecosystem service benefits, watershed management plans should focus on the rehabilitation of degraded ecosystems, and link to forest management plans in the area.

Other aspects

- The proposed PaMs should be **linked together appropriately** in order to enhance identified benefits and reduce identified risks. For example:
  - Fire prevention and control activities should be linked to PaMs supporting forest user groups, i.e. improving their capacity to prevent fire;
  - Ecotourism can be linked to PaMs on forest restoration and protected areas. Currently, there is no contribution from tourism revenues to forest management, and options to change this should be explored. Tourism routes should be designed in detail to avoid regenerating areas, and take into account the need to avoid impacts on other important sites (e.g. peatlands);
  - PaMs to control illegal logging should be linked to livelihoods support; local administrations should take measures to promote alternative income sources (e.g. agroforestry, sustainable use of non-timber forest products, temporary jobs in agriculture and forestry);
  - The PES scheme can be linked to establishing and improving protected areas, community conserved areas and watershed management, co-management of forest areas and buffer zones, and alternative livelihoods for communities;
  - PaMs on forest restoration should be linked to pest control as well as activities on livelihood support and livestock/pasture management;
  - Promotion of certification should be linked to the development of a long-term sustainable forest management plan.
- A number of **key legal issues** were identified, which were also fed into the PLR review:
  - The ongoing lack of legal clarity around pasture management, and conflicting provisions between the laws on forest and land, may affect the effective implementation of numerous PaMs and their expected benefits for forest restoration, reduced land degradation and herders' livelihoods. The Programme should seek ways to resolve the conflicting provisions.

- Saxaul utilisation is prohibited according to law, but fuelwood collection and grazing continue in these areas. Dryland forest PaMs need to clarify how to regulate this issue.
- The Law on State Service has a provision that all positions requiring specialised human resources shall have professional staff. There is a need to enforce the implementation of this law, and ensure the longer term placement of professional staff.

- A number of benefits and risks identified relate to the **tendering and contracting processes** in the forest sector. To enhance socio-economic benefits and reduce potential conflicts, options should be explored to give preference to local companies and cooperatives in tendering processes. For example, some aimags already require provision of local employment in pest control activities. An open and transparent tendering process should also be applied, with clear selection criteria. The tendering period for tree planting and pest control is currently poorly timed and inefficient; it should be shifted to earlier in the year.
- Stakeholders recommend reforms to processes for **Environment Fund allocations**, so that these are separated from local budgets; currently these resources are often used for local priorities other than conservation. By law, 85 percent of revenues from the use of forest resources are supposed to be spent on forest protection. Stakeholders also suggest an amendment in order to require that the decisions of the Citizens Representative Meetings on environmental conservation/restoration also specify the allocation of budget from natural resource tax revenues.
- Some suggestions from stakeholders relate to **taxes/duties**, e.g. to further support domestic wood production, such as a favourable tax policy for domestic producers, higher duties on imports of wood while duties are reduced for export, and soft loans for SMEs in wood processing industries. The cumulative effects of implementing a range of policies to promote domestic wood production should be considered, in terms of the long-term impacts on extraction rates, and their implications for carbon and non-carbon benefits and risks.

5. Review of Policies, Laws and Regulations (PLRs)

5.1 Introduction

Although not defined by the UNFCCC, it is commonly agreed that safeguards are *addressed* through the existence, on paper, of a coherent body of governance arrangements – policies, laws and regulations (PLRs), processes and institutional arrangements – covering the environmental and social considerations relevant to the REDD+ PaMs of a country. Safeguards are commonly understood to be *respected* through the effective implementation, in practice, of these PLRs and processes, leading to outcomes on the ground that are consistent with the safeguards. Assessing a country's PLRs – their content on paper and their implementation in practice – can help determine what safeguards-relevant PLRs are already in place, what institutions are mandated and capacitated to implement them, and what gaps, overlaps or inconsistencies in the relevant governance arrangements may limit the extent to which safeguards are addressed and respected during REDD+ implementation.

TWG-S&SIS members at workshop in Ulaanbaatar
Photo © UNEP-WCMC

A process to assess the relevant PLRs for addressing and respecting the safeguards in Mongolia took place in 2017-2018. Based on the analysis of potential benefits and risks of REDD+ (see section 4) and the text of the Cancun safeguards, the relevant PLRs were listed and specific provisions that support the safeguards were identified. In addition, key gaps in the existing PLR framework were examined and recommendations to fill these gaps were developed. The PLRs identified and the recommendations were discussed in several workshops led by the TWG-S&SIS[11]. The full report on the review of PLRs is available in English and Mongolian.

5.2 Approach and results of the PLR Review

The PLR review in Mongolia included three key elements:

i) Assessing how the country's existing PLRs already "address" key risks from REDD+ or promote priority benefits, and identifying any gaps and weaknesses in the PLR framework that may need to be filled or remedied;

[11] See for example discussion of results at the January 2018 meeting of the TWG-S&SIS: Meeting report: English, Mongolian

ii) Assessing how the country's existing PLRs are implemented in practice, and what the existing institutional capacities are, and identifying the gaps and weaknesses in implementation that may need to be filled or remedied in order to better "respect" the Cancun safeguards; and
iii) Noting potential existing systems and sources of information on benefits, risks and relevant PLRs to inform SIS design.

The results of the PLR review were then fed into a number of subsequent processes. First, the relevant PLRs, their provisions and the gaps identified were taken into account in the analysis to develop Mongolia's clarification of the Cancun safeguards (see Section 6). The clarification process also allowed more detailed analysis of particular PLR provisions and the inclusion of additional PLR information. The PLR review further provided references to potentially useful data systems and sources linked to the PLRs, which were fed into the assessment of information systems and sources for the SIS. Finally, recommendations from the PLR review were also submitted to the Ministry of Environment and Tourism for consideration in their review of environmental legislation in 2018.

The PLR review showed that Mongolia already has a comprehensive system of PLRs in place to deal with many of the potential risks and to enhance benefits from REDD+. However, some shortcomings do exist: the review highlighted some gaps in the legal framework; areas where conflicts appear to exist between laws; and areas where there are implementation weaknesses. Based on the review, some of the most relevant existing Mongolian PLRs for implementing REDD+ in line with the Cancun safeguards are:

- State Forest Policy (2015)
- Law on Forest (2012)
- Law on Land (2002)
- Law on Environment Protection (2012)
- Anti-Corruption Law (2006), and Law on Procurement of Goods, Works, and Services with State and Local Funds (2005);
- Law on Transparency and Freedom of Information (2011)
- Law on Budget Transparency (2014)
- Law on Promotion of Employment (2011)
- Law on Protected Areas (1994) and Law on Buffer Zones (1997)
- Forest Cleaning Programme (2014)
- Law on Resolution of Petitions and Complaints issued by Citizens to Government Organizations and Officials (1995);
- Law on Administrative Procedures (2016), and Regulation on Designing Development Policies (2016)
- Law on Environmental Impact Assessment (2012)
- Law on Natural Resource Use Fees (2012)

The full set of recommendations is provided in the PLR review report, but key points include the following:

- There are conflicting provisions in the Forest Law and the Land Law related to grazing in forest areas, with the former restricting it and the latter allowing it. Grazing contributes to forest degradation in Mongolia, but at the same time it is very important to the livelihoods of local people, so this uncertainty in the legal situation could lead to conflict. Therefore, the review recommends amending both laws to make it clear that grazing should not occur in regenerating and immature forest areas.

- The review further recommends to develop a procedure to support planning measures to support natural regeneration, including financing and compensation for planted trees. The "Regulation on Planning, Organizing, Financing Forestation Activities, Estimating and Purchasing Planted Trees for State Forest Fund, and Ownership Arrangement of Planted Trees" should be amended to provide for guaranteed buyback of young trees, e.g. from private sector actors engaged in the planting, after a set period of time. In addition, a guideline should be developed to support identification of areas where natural regeneration is feasible and thus potentially preferable to active planting.
- To avoid conflicts between different stakeholders and the overuse of forest resources by local people, a new regulation or guidance should be developed under the Forest Law that specifically deals with disputes over benefit sharing, coordination and resource utilization. This should ensure that forest management plans include provisions for local participation and benefit sharing based on consultation.
- Relevant regulations under the Forest Law should be amended to ensure openness and transparency in the selection of areas for forest certification. Amendments should also ensure that entities seeking certification should make efforts to provide benefits for local people.
- Similarly, bid documents in the forest sector should require private entities to ensure involvement of local citizens and forest user groups in works to be carried out, as there is otherwise a risk that future income opportunities for local people might decrease. .
- Ecotourism can bring benefits for local livelihoods and increased revenues for local area budgets, but the legal framework is weak in this area. It is recommended to develop a regulation/guidelines on the promotion and management of eco-tourism.
- The government should allocate more resources for the implementation of the Forest Cleaning Programme. The current lack of implementation has implications for the feasibility of a number of PaMs, and it affects the ability of local people to benefit from forest products. At the same time, the REDD+ National Program in Mongolia should be cognizant of the risks to carbon and non-carbon benefits associated with scaling up the removal of deadwood and the harvesting of forest products.
- To reduce the risks of corruption and mismanagement, and increase the sustainability of PaMs, the review recommends further engaging local communities and civil society in monitoring and reporting on forest activities, such as forest restoration, pest control activities, patrolling, etc. Currently, patrolling and monitoring is undertaken jointly by Forest Units and the General Agency for Specialized Inspection. Regulations or guidance may be required under the Law on Forest to increase public engagement, e.g. to allow local community/forest user group participation in patrolling.
- A number of recommendations have been put forward related to the Environment Fund and the allocation of funds from natural resource use fees. The legal provisions for the Environment Fund should ensure that allocations to the Fund are kept separate from local budgets.
- Payment for Ecosystem Services (PES) is a new concept in Mongolia and there are currently no PES schemes. The PAM on PES may require the development of a law or regulation on PES, and this should seek to avoid the risk of causing negative impacts on some people's livelihoods.
- There are numerous provisions across the PLR framework related to stakeholder engagement in the forest sector and in decision-making more broadly. The review recommends to consolidate existing provisions on stakeholder engagement in forest management into a specific regulation or guidance document.

A more general recommendation was also put forward in relation to following up on the review of PLRs. Critical PLR gaps identified through this process should be tracked over the course of upcoming amendments to environmental and other legislation (e.g. following the MET legal review in 2018 and the development of new regulations on issues such as provision of incentives). There will likely be remaining gaps that are not covered by these PLR reforms, as well as gaps that require quicker solutions, and for these the REDD+ National Program should consider other measures (e.g. voluntary/additional processes to reduce conflict between forest protection and grazing).

6. Clarification of the Safeguards in Mongolia

6.1 Approach for clarifying the safeguards in Mongolia

A national clarification explains what the principles of the REDD+ safeguards mean in the national context and uses terms that are understood and accepted by national audiences. It identifies priority issues and is linked to the existing framework of policies, laws and regulations (PLRs). In most countries, safeguards clarifications are developed through participatory processes and thus provide an entry point for stakeholder engagement.

In Mongolia, the clarification of the Cancun safeguards in the national context has been carried out under the leadership of the TWG-S&SIS and with inputs from a range of stakeholders:

- Members of other relevant REDD+ technical working groups, e.g. the TWG on Policies & Strategies;
- Representatives of key government departments, agencies and research institutes;
- Representatives of community, civil society and private sector organisations;
- Representatives of relevant international programmes/projects.

At a meeting of the TWG-S&SIS in September 2017[12], stakeholders first defined the objectives and purpose of clarifying the safeguards and identified a preferred format (a table including additional explanatory text). The agreed initial objectives for the clarification include: helping the assessment of PLRs, and improvement of PLRs and their monitoring/enforcement; supporting the evaluation/selection of PAMs; meeting donor and fundraising requirements; and informing the design of the SIS and monitoring and evaluation (M&E) systems for REDD+.

A template was developed to facilitate the process of clarifying the safeguards, which was then pre-populated by the team based on the outputs of previous steps, such as information on benefits, risks and PLRs, arranged according to a set of generic elements for each safeguard that has been derived from international experience and good practice.

To complete the clarification of the safeguards, in December 2017, a multi-stakeholder workshop[13] reviewed the tables of background information for the clarification and provided inputs on priority issues for Mongolia. A draft national clarification based on these inputs was then reviewed and refined during a meeting with the TWG-S&SIS in March 2018[14]. Following the preparation of the draft, the team also mapped the clarification against the safeguards used by the International Finance Corporation (IFC), to understand the alignment of the Mongolia clarification with this safeguards framework, which is potentially relevant to several donors for initiatives on forests and climate change

[12] Meeting report: English, Mongolian
[13] Workshop report: English, Mongolian
[14] Meeting materials: English, Mongolian

in Mongolia[15]. A final draft clarification document was then shared with TWG-S&SIS members and other stakeholders for a last round of review.

6.2 Results: Mongolia's safeguards clarification

Mongolia's national safeguards clarification was finalised in 2018. It is structured according to seven principles that are based on the Cancun safeguards and then presents a set of national safeguard elements to clarify the content of each principle for Mongolia. In total, there are 36 of these elements. The text of the national clarification is presented in Annex 1. The full clarification report, including the background information and the matrix mapping the clarification against the IFC performance standards, is available on www.reddplus.mn. The safeguards clarification can be considered a 'living document', and may require some revisions as REDD+ implementation proceeds in Mongolia, as PLRs are reformed, and as the requirements of funding organisations evolve.

7. Grievance redress mechanism for REDD+ in Mongolia

7.1 Introduction

The Joint FCPF/UN-REDD Programme Grievance Redress Mechanism (GRM) Guidance Note[16] defines GRMs as organizational systems and resources established by national government agencies (or, as appropriate, by regional and municipal agencies) to receive and address concerns about the impact of their policies, programmes and operations on external stakeholders. The stakeholder input handled through these systems and procedures may be called "grievances", "complaints", "feedback" or another functionally equivalent term.

The Mongolian legal and regulatory framework does not use the term "grievance", but instead refers to "petitions" and "complaints". Article 4 of the Law on Resolution of Petitions and Complaints of Citizens by Government Institutions and Officials (1995) defines a "petition" as a form of request, proposal, appeal, memo or requirement to a government institution and officials on issues essential for the country and society. It further defines "complaints" as requests to restore legitimate rights, freedoms and interests of citizens that are considered to have been violated by the decision or action of a government institution and officials. These legal definitions will herewith form the basis for further discussions and iterations of GRMs in the REDD+ context.

7.2 Anticipated grievances in relation to REDD+

Emerging from the benefits and risks assessment of proposed REDD+ PaMs in Mongolia, seven categories of potential grievances related to REDD+ have been identified. These are either procedural or substantive in nature. They are expected to predominantly affect forest user groups, community members, herders and workers, with grievances occurring internally or between stakeholders and government entities or other external parties. Examples of potential causes of disputes and grievances in the seven categories are shown in Table 3 below:

[15] The Environmental and Social Performance Standards for Environmental and Social Sustainability are employed by both the International Finance Corporation (IFC) and the Green Climate Fund (GCF).
[16] Joint FCPF/UN-REDD Programme Guidance Note for REDD+ Countries: Establishing and Strengthening Grievance Redress Mechanisms, June 2015.

Table 3: Potential disputes and grievances relevant to REDD+ in Mongolia

Category	Examples of possible causes for grievances from the benefits and risks assessment
Access, use, ownership of resources	Conflict may occur between economic entities and forest user groups, e.g. over access to forests and harvesting (economic entities usually get higher quality timber, while forest user groups are left with deadwood).
	Conflict may arise with herders over access to areas designated for forest regeneration.
	Disputes and conflicts related to water use, including for REDD+ PaMs, can arise among users of water sources.
	Conflicts between local people and local patrollers (for forest law enforcement) may occur.
	Dispute and conflicts can arise among protected area administrations, local citizens and forest user groups in relation to the use of resources from forest reserves (e.g. fuelwood and other NTFPs).
	Protected areas expansion and pasture management PaMs may reduce availability of land for public use (e.g. for grazing) and restrict access to pasture, leading to hardship for herders.
	If there is more protection of water sources, land use will be restricted and lack of water sources will bring difficulties to herders.
	With regeneration of saxaul forest and increased land utilisation for agroforestry, pasture land area may decrease and land disputes arise.
Livelihoods	Conflicts and disputes may arise between the workers and management of wood processing factories in relation to the low salaries often paid to local people.
	Changes in land use rights and access (e.g. through increased protection/regeneration of forest, decline in pasture land availability, and/or forced evictions), may lead to increased migration as livelihood opportunities are reduced.
	PaMs for forest protection may have a negative impact on some people's livelihoods, e.g. those who set fires for hunting/deadwood; those who use NTFPs; those involved in logging/wood sales; those using water resources. Problems of poverty and poor living conditions may increase. Effects may be inequitably distributed.
	A new burden of taxes (e.g. to pay for ecosystem services) may affect citizens.
	Livelihoods of local communities can decline through alternative livelihood schemes, e.g. if agroforestry is less profitable than previous livelihoods like grazing.
	There may be risks to gender equality, e.g. job opportunities for men may increase and the gender ratio lost.
Occupational safety and health	There may be the risk of an increase in social problems related to logging camps.
	Health and safety risks may arise for people implementing activities like pest control (e.g. allergic reactions, climbing accidents, etc.) and wood processing.
Traditions, customs and culture	REDD+ PaMs may cause pressure on traditional ways of life, and expansion of protected areas may also conflict with regulations on preserving traditions. Traditional nomadic culture may be lost due to people shifting from herding to new livelihoods.
Benefit distribution	Local people who are not involved in user groups may not equally benefit from forest resources; there may also be lack of involvement of user groups/local citizens in PaMs where the emphasis is on supporting business enterprises.
	A risk of unfair distribution of incentives may arise; income from use of natural resources may only benefit limited groups of people and authorities (e.g. local authorities).
	Some local people/households, e.g. those with more livestock or more start-up capital or resources, may get preference and benefit more from the PaMs.
Information	Information may not be provided and disseminated comprehensively, and may not reach target groups (e.g. in remote areas).
Transparent governance	Conflict related to revenue collection and allocation of funds to conservation will increase between citizens/ civil society and local administrations.
	Corruption may occur in tendering and contracting processes.

7.3 Existing GRMs in Mongolia

The basis to address possible REDD+ grievances should be the existing national provisions for GRMs contained in the Law on Resolution of Petitions and Complaints of Citizens by Government Institutions

and Officials (1995); the Law on the National Human Rights Commission of Mongolia (2000); and the General Administrative Law (2015). The GRMs contained in these laws are briefly described below.

Law on Resolution of Petitions and Complaints of Citizens by Government Institutions and Officials (1995): This law describes the rights of citizens to submit a petition or complaint and the steps to be taken by government institutions and officials to accept and resolve them. According to this law, complainants can individually or collectively file a petition or complaint in writing or orally; receive a response from the government institution or official to which the petition or complaint was submitted; withdraw the petition or complaint; and submit a complaint to a higher official if responses are unsatisfactory. Government institutions and officials on the other hand are required to accept and register petitions and complaints; review them for relevance, leading to further analysis or transfer to another institution; and depending on the situation either refuse or suspend the case, or resolve and respond to the petition or complaint. Each petition or complaint shall be resolved within 30 days from the date of receipt, with the possibility to extend the period for an additional 30 days if required.

Law on National Human Rights Commission of Mongolia (2000): The National Human Rights Commission of Mongolia (NHRCM) is mandated with the promotion and protection of human rights, and the monitoring of the provisions on human rights and freedoms contained in the Constitution of Mongolia, national laws and international treaties. Citizens have a right to lodge individual or joint complaints related to the mandate overseen by NHRCM, and these are handled by a Complaint and Inquiry Division. Procedures to handle these complaints are clearly laid out and widely publicized. Complainants can lodge a complaint verbally in person, in written form, via telephone or through an online form. However, the complaint must be lodged within a year from the date on which the rights or freedoms have been violated. The NHRCM Commissioners will then accept and examine the complaints; refuse to accept complaints which do not meet the Commission's requirements; transfer complaints and disputes related to civil and criminal law to relevant authorities or officials with the appropriate jurisdiction; and explain to the complainants their rights and duties in relation to the restoration of violated rights. The NHRCM must provide a reply to each complaint within 30 days from date of receipt, with the possibility of an extension of up to 60 days being granted by the Chief Commissioner if additional research and inquiry is required. In deciding on how to deal with complaints, Commissioners have several options: they can submit claims to Court; request competent authorities or officials to impose administrative sanctions on officials who are deemed to have violated human rights and freedoms; require organisations or officials to stop activities that violate rights or freedoms , or that create conditions for these violations; reach a settlement through conciliation between parties; and return the complaint to the complainant if it is deemed to be without sufficient grounds. In 2014, the NHRCM in Ulaanbaatar is further strengthened by 21 human rights officers who are based in the 21 aimags. The NHRCM publishes annual status reports on human rights and freedoms that analyse the trends and causes of complaints received during the year.

General Administrative Law (2015): This law is intended to establish certainty, consistency and predictability in the legal interactions between citizens and administrative agencies. Section 4, Articles 92 to 99 of this law stipulates procedures for handling complaints. A complaint against a regulatory act must be lodged with the administrative body that will rule on the complaint within 30 working days of notification of the act. The administrative body will then have 30 days to make a ruling and notify the complainant, with an extension of up to 30 days if deemed necessary. Upon receipt of the complaint, the administrative body will investigate conformance with legislation and its purpose and determine whether due consideration of available options has been carried out, before deciding. The administrative body is not allowed to transfer the complaint to other bodies. If it is found that a remedy for damage is required, the liability will be borne by the State.

7.4 Recommendations

It is recommended that a future REDD+ GRM will rely on the three national GRMs introduced above to address grievances arising from REDD+ implementation. However, prior to implementation, it is suggested that an additional and more thorough assessment be carried out to determine whether these GRMs adhere to and are consistently operationalizing the key principles described in the table below[17]. It is also recommended that the assessment review informal types of GRMs, as well as conflict resolution processes, and seek to understand and provide advice on using the potential for complementarity between various types of mechanisms.

Table 4: Key principles for GRMs

Principles	Questions to Consider
Legitimacy	Does the GRM operate independently of interested parties? Is the GRM widely-perceived as independent?
Accessibility	Is the GRM accessible to all stakeholders, irrespective of their remoteness, language, education or income level? Are procedures to file grievances and seek action easily understood by project beneficiaries? Can grievances be filed anonymously? Are there a range of contact options? Is the GRM appropriately advertised and communicated to project-affected people?
Predictability	Is the GRM responsive to the needs of all complainants? Does the GRM offer a clear procedure with time frames for each stage and clarity on the types of results it can (and cannot) deliver?
Fairness	Are grievances treated confidentially, assessed impartially and handled transparently?
Rights Compatibility	Are the GRM's outcomes consistent with applicable national and international standards? Does it restrict access to other redress mechanisms?
Transparency	Are the GRM's procedures and outcomes transparent enough to meet the public interest concerns at stake?
Capability	Are there dedicated and trained staff available to handle the GRM? Are they given learning opportunities and do they receive any systematic reviews for their performance?

The assessment should also include details of the GRM processes or steps[18] that are in place and how these compare against international standards (Table 5).

Table 5: Assessing GRMs against international standards

Processes	Questions to Consider
Uptake	Do multiple uptake channels exist?
Sorting and processing	Do multiple uptake channels exist?
Acknowledgement and follow-up	Are complaints acknowledged in writing? Does the acknowledgement outline the GRM process, provide contact details and indicate how long it is likely to take to resolve the grievance? Are there clear timetables that are publicly available?

[17] Joint FCPF/UN-REDD Programme Guidance Note for REDD+ Countries: Establishing and Strengthening Grievance Redress Mechanisms, June 2015.

[18] Joint FCPF/UN-REDD Programme Guidance Note for REDD+ Countries: Establishing and Strengthening Grievance Redress Mechanisms, June 2015.

Verification, investigation and action	Is the merit of each grievance judged objectively against clearly defined standards? Are investigators neutral or do they have a stake in the outcome? Is action taken on ever grievance?
Monitoring and evaluation	Is there a process to track grievances and assess progress being made to resolve grievances? Are there indicators to measure grievance monitoring and resolution? If there is a data being collected, is this data used to make policy and/or process changes to minimize similar grievances in the future? Is collected data available in certain categories, e.g. by geographical area, sector, gender?
Feedback	Does a user survey exist to get feedback on the credibility of the process? Is such feedback publicly available? Is there right to appeal? If yes, are GRM users informed about this right?
Analysis	Is there a process to analyse the effectiveness of the GRM? Is there a timeframe?

The findings from these assessments should then be used to identify areas that should be strengthened or revised in the existing mechanisms, and corresponding actions to be taken. Consideration as to whether a site-based GRM team is needed should also be undertaken, and if so, designed prior to REDD+ implementation. If establishing such a team, the following should be made clear:

- Mandate of the GRM
- Functions of the GRM
- Composition of the GRM with clear roles and responsibilities
- Processes of the GRM including who can submit a grievance, how it is communicated and what information to include
- Monitoring of the GRM

8. Conclusions and next steps

Mongolia's national REDD+ safeguards framework, developed through a participatory process during 2017-2018, aims to help the country contextualise the international safeguards, meet international safeguards requirements in a way that accords with national goals and circumstances, and make full use of existing systems in the country. The development of the national safeguards framework included consideration of the following five key components, as set out in this document: goals and scope; potential benefits and risks, and measures to enhance/mitigate these; safeguards relevant PLRs; national safeguards clarification; and REDD+ GRM.

More detailed recommendations have been provided in the sections of this document; these are summarised briefly below:

- Information on the potential benefits and risks identified for the proposed REDD+ policies and measures, as well as the suggested measures to enhance benefits, reduce risks and improve how safeguards issues are addressed, should be integrated into several key aspects of the REDD+ National Program in Mongolia: the design of REDD+ policies and measures; the monitoring framework; and the Safeguard Information System (SIS).
- The results of the PLR review have fed into a number of subsequent processes, including through a set of recommendations submitted to the Ministry of Environment and Tourism for consideration in their review of environmental legislation in 2018. Critical PLR gaps identified through this process should be tracked through upcoming amendments to environmental and

other legislation; remaining gaps that are not covered in PLR reforms or require quicker solutions, may require other measures.

- Mongolia's national safeguards clarification was finalised in 2018, taking the Cancun safeguards as its principles and presenting a set of national safeguard elements to clarify their content for Mongolia. These elements were also mapped against IFC performance standards. The safeguards clarification can be considered a 'living' document, and may require some revisions as REDD+ implementation proceeds in Mongolia.
- A future REDD+ GRM is recommended to rely on Mongolia's existing three national GRMs. However, prior to implementation, it is recommended that additional assessment be carried out to determine the extent to which these GRMs meet REDD+ needs and are consistent with international best practice.

In addition, there are several recommendations and proposed next steps for further developing the national safeguards framework and ensuring its integration in future REDD+ implementation in Mongolia:

- The wider REDD+ implementation context in Mongolia has not yet been fully determined, and how this initiative moves forward in the future has implications for the national safeguards framework. For example, key factors to consider are:
    - How will REDD+ be coordinated and implemented at the national level, and whether this will include the establishment of a forest agency. If so, what resources (human, technical) may be needed to ensure this agency has sufficient capacity to apply the national safeguards? In addition, which other national ministries or agencies are likely to take a leading or supporting role in implementing PaMs (e.g. Industry, Energy)?
    - Whether and how PaMs may be implemented at the subnational level, and whether this will be through subnational REDD+ action plans. If so, how should safeguards aspects be fully integrated into these plans, and how should responsibility for ensuring application of the safeguards be allocated?
- Considering these questions, a number of proposed, future activities have been put forward for inclusion in the REDD+ National Program:
    - Develop guidance document and provide training on applying and monitoring Mongolia's safeguards framework, for use by REDD+ implementing agencies at national and potentially subnational levels. Such guidance would include: the relevant PLRs and other safeguards instruments that have been recommended for use in Mongolia to ensure that safeguards are being addressed and respected; and how these are linked to the monitoring framework, i.e. what information on safeguards should be collected.
    - Ensure that indicators and processes for monitoring and evaluating the application of the safeguards framework are sufficiently integrated into the REDD+ National Program, e.g. in terms of the inclusion of safeguards relevant indicators in monitoring frameworks, and adequate resources allocated for safeguards application and monitoring.
    - Provide training on safeguards, social inclusion, GRM, etc., to REDD+ implementing agencies at national and subnational level as needed. These topics could be integrated in proposed REDD+ capacity building activities under the REDD+ National Program

Annex 1: Mongolia's national safeguards clarification

The following tables present Mongolia's clarification of the Cancun Safeguards, including a summary of relevant PLRs for addressing and respecting the safeguards.

Safeguard A: [REDD+] actions complement or are consistent with the objectives of national forest programmes and relevant international conventions and agreements	
National safeguard element	**Relevant policies, laws and regulations for addressing and respecting the safeguard**
A1. REDD+ policies and measures (PaMs) should be designed and implemented so that they are consistent with, and support, key relevant international environmental conventions that Mongolia has ratified and respective national programmes for their implementation, including: the RAMSAR Convention and the National Programme on Water; the Convention on Biological Diversity, the National Programme on Biodiversity and the National Programme on Strictly Protected Areas; the UN Convention to Combat Desertification and the National Action Programme for Combating Desertification; and the Saint Petersburg Declaration on Ensuring Forest Law Enforcement and Fighting Illegal Logging.	The Ramsar Convention (1971) (entered into force in Mongolia in 1998) The Law on Water (2012) National Programme on Water (2016-2021) / National Integrated Water Resource Management Plan The Convention on Biological Diversity (1993) National Biodiversity Programme (2015-2025) National Programme on Strictly Protected Areas (1998) UN Convention to Combat Desertification (1994) National Action Programme for Combating Desertification (2010-2020) Saint Petersburg Declaration on Ensuring Forest Law Enforcement and Fighting Illegal Logging (2005)
A2. REDD+ PaMs should be designed and implemented so that they are consistent with and support the State Forest Policy, the Law on Forests, the Forest Cleaning Programme, the Green Development Policy, and relevant policies related to national security.	State Forest Policy (2015) Law on Forest (2012) Forest Cleaning Programme (2014) Green Development Policy (2014) National Security Concept (1995)
A3. REDD+ PaMs should be designed and implemented so that they are consistent with and support Mongolia's key efforts to promote poverty reduction and sustainable development, including the National Poverty Reduction Programme, and the Mongolia Sustainable Development Vision 2030 and the global Sustainable Development Goals.	National Poverty Alleviation Programme / Strategy (1993) Mongolia Sustainable Development Vision 2030 International Sustainable Development Goals (SDGs) National Programme on Strictly Protected Areas (1998) Law on Strictly Protected Areas (1994)

	Law on Buffer Zones of Protected Areas (1997) Law on Environmental Protection (1995) Green Development Policy (2014)
A4. REDD+ PaMs should be designed and implemented so that they are consistent with and support Mongolia's key commitments on climate change, including the National Action Programme on Climate Change and Mongolia's Nationally Determined Contribution to the UNFCCC.	National Action Programme on Climate Change (2017-2021) Mongolia First Nationally Determined Contribution (2016) State Forest Policy (2015) Law on Forest (2012)
A5. REDD+ PaMs should be designed and implemented so that they uphold Mongolia's obligations and policies related to human rights and livelihoods, including the Constitution of Mongolia, the Universal Declaration of Human Rights and Mongolia Law on National Human Rights Commission, and International Conventions on Employment and the State Employment Policy.	Constitution of Mongolia (1992/2001) Universal Declaration on Human Rights (1948) Mongolia Law on National Human Rights Commission (2000) International Conventions on Employment (various ILO conventions) State Employment Policy (2016) Law on Promotion of Employment (2011) International Covenant on Economic, Social and Cultural Rights (1966) International Covenant on Civil and Political Rights (1966) Convention on the Rights of the Child (1989) Labour Law (1999) Law on Strictly Protected Areas (1994) / Law on Buffer Zones of Protected Areas (1997)
Safeguard B: Transparent and effective national forest governance structures, taking into account national legislation and sovereignty	
National safeguard element	**Relevant existing policies, laws and regulations for addressing and respecting the safeguard**
B1. REDD+ PaMs should be implemented and monitored according to relevant articles of identified policies, laws and regulations of Mongolia. The REDD+ National Program should be reviewed on an annual basis, with participation of relevant stakeholders.	General Administrative Law (2015) Regulation on Development of National Policies and Programs (2015) Law on Violations (2017) Law on State Inspection (2003) Law on Environmental Protection (1995)

B2. The design and implementation of REDD+ PaMs should include the allocation of sufficient resources, including human and technical resources, as well as provisions for developing sufficient institutional and technical capacity in line with sustainable forest management plans developed under the Law on Forest.	Law on Natural Resource Use Fees (2012) Law on Forest (2012) Law on Public Service (2002) Law on Strictly Protected Areas (1994) / Law on Buffer Zones of Protected Areas (1997) Green Development Policy (2014) State Forest Policy (2015) Forest Cleaning Programme (2014)
B3. REDD+ PaMs should define the roles, mandates and responsibilities of relevant stakeholders to reduce conflicts and corruption, and enhance transparency and accountability. Measures to tackle corruption, as enshrined in Mongolia's relevant policies, laws and regulations (including the Law on Anti-Corruption and the Law on Procurement of Goods, Work and Services with State and Local Funds) shall be applied in the implementation of REDD+ PaMs.	Law on Anti-Corruption (2006) Law on Procurement of Goods, Work and Services with State and Local Funds (2005) Law on State Inspection (2003) Law on Public Service (2002)
B4. The design and implementation of REDD+ PaMs should promote the cross-sectoral coherency of national and local policies and regulatory frameworks, and the coordination of relevant implementing agencies, supporting transparent and effective forest governance.	General Administrative Law (2015) Law on Forest (2012) Law on Land (2002)
B5. REDD+ PaMs should be designed and implemented so that they consider and promote gender equity, and meet the requirements of the Law on Promotion of Gender Equality.	Constitution of Mongolia (1992/2001/2013) Mongolia Sustainable Development Vison 2030 Law on Promotion of Gender Equality (2011) National Programme on Gender Equality (2017-2021) Environmental Sector Gender Strategy (2014-2030) Convention on the Elimination of All Forms of Discrimination against Women (1980)
B6. REDD+ PaMs should be designed and implemented according to the Law on Transparency of Information and Right to Information, so that information about PaMs is accessible, transparent and delivered using means that are appropriate for different identified groups of stakeholders.	Law on Transparency and Freedom of Information (2011) State Forest Policy (2015) National Programme on Implementation of Human Rights (2003) Law on Promotion of Employment (2011)

Safeguard C: Respect for the knowledge and rights of indigenous peoples and members of local communities, by taking into account relevant international obligations, national circumstances and laws, and noting that the United Nations General Assembly has adopted the United Nations Declaration on the Rights of Indigenous Peoples	
National safeguard element	**Relevant existing policies, laws and regulations for addressing and respecting the safeguard**
C1. In the context of REDD+ design and implementation in Mongolia, indigenous peoples, local people and ethnic minorities are defined according to the relevant PLRs and the principle of self-determination.	Constitution of Mongolia (1992/2001/2013) Law on Administrative Procedures (2016) National Programme on Implementation of Human Rights (2003) Citizens' Khurals / Representative Meetings
C2. REDD+ PaMs should be designed and implemented to ensure an appropriate and equitable distribution of incentives and benefits from carbon and ecosystem services, supporting the long-term sustainability of REDD+. As far as possible, REDD+ PaMs should utilise existing regulations and structures for the distribution of incentives and benefits, such as user groups and local development funds.	Law on Forest (2012) Forest Cleaning Programme (2014) Law on Budget (2011) Law on Environmental Protection (1995) Law on Strictly Protected Areas (1994) / Law on Buffer Zones of Protected Areas (1997) Law on Small and Medium Enterprises (2007) Law on Promotion of Gender Equality (2011)
C3. REDD+ PaMs should be designed and implemented with full recognition of stakeholders' rights to land, territories and resources, as specified in relevant policies, laws and regulations. REDD+ PaMs should clarify and strengthen relevant land relations, as defined in the Law on Land.	Constitution of Mongolia (1992/2001/2013) Law on Land (2002) Law on Forest (2012) State Forest Policy (2015) Law on Environmental Protection (1995) Law on Water (2012) National Programme on Protected Areas (1998)
C4. REDD+ PaMs should be designed and implemented so that the traditional knowledge, cultural heritage, and intellectual property of local people is protected and promoted in accordance with relevant policies, laws and regulations. Physical cultural heritage that belongs in	Constitution of Mongolia (1992/2001/2013) Law on Protection of Cultural Heritage (2014) Law on Strictly Protected Areas (1994) Law on Buffer Zones of Protected Areas (1997)

public ownership shall be held under conditions set out by relevant government, local religious and public organisations.	Law on Natural Flora (1995) National Action Programme on Climate Change (2017-2021) Law on Genetic Resources (under development by MET)
C5. REDD+ PaMs should be designed and implemented to avoid and/or reduce any risks of resettlement and/or economic displacement of people with rights to land and resources. Where access restrictions are an essential component for the success of REDD+ PaMs, appropriate forms of compensation will be proposed and agreed prior to the implementation of the PaM.	Law on Strictly Protected Areas (1994) / Law on Buffer Zones of Protected Areas (1997) Law on EIA (2012) Law on Land (2002) Law on Forest (2012)
Safeguard D: The full and effective participation of relevant stakeholders, in particular indigenous peoples and local communities [in REDD+ actions]	
National safeguard element	**Relevant existing policies, laws and regulations for addressing and respecting the safeguard**
D1. During design and implementation, REDD+ PaMs should identify and define relevant stakeholders, which depending on the PaM, may include local self-governing authorities, administrations for Protected Areas and Watersheds, local people, resource user groups, civil society organisations and associations, herders, economic entities and other actors in the private sector. Identification of relevant stakeholders shall consider the legitimacy of any bodies representing these stakeholders, in accordance with relevant policies, laws and regulations.	State Forest Policy (2015) Law on Forest (2012) Forest Cleaning Programme (2014) Law on Strictly Protected Areas (1994) / Law on Buffer Zones of Protected Areas (1997) Law on Procurement of Goods, Work and Services with State and Local Funds (2005)
D2. During the design and implementation of REDD+ PaMs, the rights of relevant stakeholders to participate in decision-making shall be recognised and implemented. Decision-making processes for the design and implementation of REDD+ should be: (i) based on relevant evidence and expert knowledge; (ii) reached through open discussion between government, civil society, communities, citizens and other relevant stakeholders; and (iii) incorporate the perspectives and feedback of these stakeholders.	Law on Transparency and Freedom of Information (2011) Law on Administrative Procedures (2016) General Administrative Law (2015) Law on Violations (2017) Law on EIA (2012) State Forest Policy (2015) Law on Forest (2012) Law on Strictly Protected Areas (1994) / Law on Buffer Zones of Protected Areas (1997)

D3. The design and implementation of REDD+ PaMs should be linked to relevant national development policies and programmes, utilising existing mechanisms where possible to ensure multi-sector and multi-stakeholder based design, implementation and monitoring of REDD+ PaMs.	Mechanisms established for REDD+ (e.g. Forest Sustainable Development Council) Law on Strictly Protected Areas (1994) / Law on Buffer Zones of Protected Areas (1997) Citizens' Khurals / Representative Meetings Law on Forest (2012) Forest Cleaning Programme (2014)
D4. Adequate access to justice for citizens and stakeholders, who find themselves in situations of conflict as a result of the implementation of REDD+ PaMs, and adequate and transparent feedback mechanisms, should be ensured by the Government of Mongolia in compliance with relevant PLRs.	Law on Administrative Procedures (2016) Law on Resolution of Petitions and Complaints issued by Citizens to Government Organizations and Officials (1995) Law on the National Human Rights Commission of Mongolia (2000) Law on State Inspection (2003)
Safeguard E: [REDD+] actions are consistent with the conservation of natural forests and biological diversity, ensuring that REDD+ actions are not used for the conversion of natural forests, but are instead used to incentivize the protection and conservation of natural forests and their ecosystem services, and to enhance other social and environmental benefits	
National safeguard element	**Relevant existing policies, laws and regulations for addressing and respecting the safeguard**
E1. REDD+ PaMs should be based on and respect the agreed national definition of forest.	Law on Forest (2012) Forest Reference Level (FRL) Guidance on forest inventory (2014)
E2. REDD+ PaMs should be designed and implemented to fully adhere to relevant legal requirements related to impact assessment; potential social and environmental impacts should be considered, including impacts in both forest and non-forest areas..	Law on Environment Impact Assessment (2012) State Forest Policy (2015) Forest Cleaning Programme (2014)

E3. REDD+ PaMs should be designed and implemented to conserve natural forests and minimise their degradation, including through the creation and implementation of appropriate incentive measures and accountability of forest users.	State Forest Policy (2015) Green Development Policy (2014) Law on Forest (2012) Forest Cleaning Programme (2014) Regulation on Planning, Management and Financing of Forestation, Forestry measures, valuing, Purchasing and Ownership of Planted Forest (Joint Decree of Minister of Environment and Green Development and Minister of Finance, 2013) Law on Plant Protection (2007) Law on Strictly Protected Areas (1994) / Law on Buffer Zones of Protected Areas (1997) Law on Environment Protection (1995) *(See also element C2 on benefit-sharing)*
E4. REDD+ PaMs should not be used to convert or support the conversion of natural forests to other land uses, including conversion from natural to planted forests.	Law on Forest (2012) Law on Land (2002) Law on Modified Organisms (2007) *(See also element E1 on definition of natural forest)*
E5. REDD+ PaMs should be designed and implemented so that they minimise negative social impacts and enhance economic and social well-being, particularly through seeking to promote employment opportunities for local people, especially for those from disadvantaged or vulnerable groups.	National Action Plan on Climate Change (2011) State Forest Policy (2015) Green Development Policy (2014) Law on Forest (2012) Law on Land (2002) Forest Cleaning Programme (2014) Law on Employment Promotion (2011) Law on Strictly Protected Areas (1994) Law on Buffer Zones of Protected Areas (1997) Law on Tourism (2000) / National Programme on Tourism Development (2016-2020) National Mongolian Livestock Programme (2016-2021?) Law on Occupational Safety and Hygiene (2008) *(See also element A3 on poverty reduction and C5 on economic displacement/resettlement)*

E6. REDD+ PaMs should be designed and implemented to support the conservation and restoration of priority ecosystem services where possible, as determined through consultative stakeholder processes at the local and/or national levels.	Law on Forest (2012) Law on Strictly Protected Areas (1994) / Law on Buffer Zones of Protected Areas (1997) State Forest Policy (2015) National Programme on Biodiversity (2015-2025)
Safeguard F: Actions to address the risks of reversals[19]	
National safeguard element	**Relevant existing policies, laws and regulations for addressing and respecting the safeguard**
F1. The selection, design, implementation and monitoring of REDD+ PaMs should include measures that are targeted at the key direct and indirect drivers of deforestation and degradation, and barriers to sustainable management, conservation and enhancement, at national and local levels, which are considered priorities for the long-term sustainability of REDD+ in Mongolia, in accordance with relevant forest policies.	Law on Forest (2012) State Forest Policy (2015) Green Development Policy (2014) Law on Land (2002) Law on Soil Protection and Prevention from Desertification (2012) National Action Programme for Combating Desertification (2010-2020) Law on Plant Protection (2007) Law on Environmental Protection (1995) (*See also element F1 on drivers of risks*)
F2. The design of REDD+ PaMs will consider the risks of reversals. Based on analysis of these risks (which may include legal, social and ecological factors such as changes in policy and over-extraction of forest resources), the design and implementation of REDD+ PaMs should incorporate measures to reduce the identified risks of reversals.	Law on Forest (2012) State Forest Policy (2015) Green Development Policy (2014) Law on Land (2002) Law on Soil Protection and Prevention from Desertification (2012) National Action Programme for Combating Desertification (2010-2020) Law on EIA (2012) Law on Public Service (2002)

[19] The term 'reversal' as used in this safeguard is specific to REDD+, referring to a situation where reductions in emissions that have been achieved and reported are not permanent, i.e. are reversed.

	Regulation on Allocating Small Loans from Employment Promotion Fund, Issuing credential and Re-Imbursement of Interest, and Providing Financial Support (2016) Regulation on Prevention from Forest and Steppe Fire (Resolution No. 109 by Government, 2013) Law on Environmental Protection (1995)
F3. The National Forest Monitoring System (NFMS)[20] should be designed, maintained and implemented with the appropriate human and technical resources and frequency to detect and provide information on reversals, including the identified risks of reversals.	NFMS Action Plan / Standard Operating Procedures (SOP) for the Centralized Forest Information Systems.
F4. The monitoring and evaluation of REDD+ implementation should include mechanisms to ensure that if any reversals of emissions occurs, the causes are investigated and appropriate management responses taken.	Law on State Inspection (2003) Other relevant documents likely to include REDD+ National Program / M&E framework; some overlap with NFMS operation/protocols.
Safeguard G: Actions to reduce displacement of emissions[21]	
National safeguard element	**Relevant existing policies, laws and regulations for addressing and respecting the safeguard**
G1. The REDD+ National Program and its REDD+ PaMs should be designed to ensure appropriate coverage of the national territory (including relevant forest and non-forest ecosystems) and the cross-sector participation of all relevant stakeholders for REDD+ implementation.	REDD+ National Program and Forest Reference Level. Law on Forest (2012) State Forest Policy (2015) Law on Land (2002) Law on Soil Protection and Prevention from Desertification (2012) National Action Programme for Combating Desertification (2010-2020)
G2. The selection, design, implementation and monitoring of REDD+ PaMs should include measures that are targeted at the key direct and indirect drivers of deforestation and degradation, and barriers to	Law on Forest (2012) State Forest Policy (2015)

[20]Countries implementing REDD+ need to have monitoring systems that provide accurate data on emissions and are required to develop a national forest monitoring system (NFMS), as set out in the Decisions of the 16th Conference of the Parties to UNFCCC.

[21] Displacement, or leakage, refers to when deforestation and/or forest degradation, reduced in one forested area, is moved or displaced to another.

sustainable management, conservation and enhancement, at national and local level, which are considered priorities for the long-term sustainability of REDD+ in Mongolia, in accordance with relevant forest policies.	Law on Land (2002) Law on Soil Protection and Prevention from Desertification (2012) National Action Programme for Combating Desertification (2010-2020) Law on Plant Protection (2007) *(See also element F2 on addressing drivers)*
G3. The design of REDD+ PaMs will consider the risks of displacement to other forest and non-forests areas, including the potential impacts of REDD+ PaMs on forest-based and other livelihoods. Based on analysis of these risks, the design and implementation of REDD+ PaMs should incorporate measures to reduce the identified risks of displacement.	Law on Environmental Protection (1995) Law on Forest (2012) Green Development Policy (2014) Law on Strictly Protected Areas (1994) Law on Buffer Zones of Protected Areas (1997) Regulation on Allocating Small Loans from Employment Promotion Fund, Issuing Credential and Re-Imbursement of Interest and Providing Financial Support (2016) *(See also element F1 on risks of reversals and element C5 on resettlement/economic displacement)*
G4. The National Forest Monitoring System (NFMS) should be designed, maintained and implemented with the appropriate human and technical resources and frequency to detect and provide information on displacement, including the identified risks of displacement.	NFMS Action Plan / Standard Operating Procedures (SOP) for the Centralized Forest Information Systems (*See also element F3 on NFMS*)
G5. The monitoring and evaluation of REDD+ implementation should include mechanisms to ensure that if any displacement of emissions occurs to other forest or non-forest areas, the causes of the displacement are investigated and appropriate management responses taken.	Law on State Inspection (2003) Other relevant documents likely to include REDD+ National Program / M&E framework; some overlap with NFMS operation/protocols.

UN-REDD PROGRAMME

Food and Agriculture Organization of the United Nations

UNDP

UN environment

Монгол орны UN-REDD Үндэсний Хөтөлбөр

Хаяг: Зөвгийн гозрын II бойр, Нэгдсэн үндэстний гудамж 5/2, Чингэлтэй дүүрэг, Улаанбаатар 15160, Монгол улс

Утас: +976-7711-7750

Цахим шуудан: info@unredd.mn

Вэбсайт: www.reddplus.mn