

Comments implementation plan for the phase 2 of the Joint Declaration of Intent between the Government of Peru, Germany and Norway.

We commend Peru for taking into account Norwegian and German comments on some of the indicators and proposals for means of verification of the milestones, and the great effort to answer to out comments and questions to the IDB-facility. We still have some substantial comments and questions on some of the milestones that need to be addressed in the implementation plan. This text complements the comments sent to Peru the 31st October 2017.

The role of the implementation plan

The role of the implementation plan is still not clearly spelled out. The introduction mentions that the plan looks to describe “the implementation of a results based payments process to reduce deforestation”. Its aim, rather, should be to define and describe in detail how Peru will achieve the milestones established under the DCI Phase 2, and moreover assign responsibilities for this endeavor. It would also be useful to spell out how the plan will contribute to the National Forest and Climate Change Strategy, the NDCs and the Regulations for Forest Conservation, as discussed on Monday.

Consultation process and public participation

In the proposed plan, civil society consultation and participation is in general addressed both inadequately and too scarcely. The plan must embrace a much stronger attention to the different civil society stakeholders’ rights and interests, especially those of the indigenous peoples, and it must be much clearer on how the authorities will ensure that consultation and participation will be real and in line with the ILO Convention 169 (in the case of indigenous peoples). The ILO convention 169, ratified by Peru, is not mentioned in the proposed plan, and may apply for several of the proposed activities, and should be addressed. To avoid setting up parallel processes, we would recommend to build on existing structures, such as the PPIA, SINAFOR, etc. etc.

Description of the financial mechanism and governance

It would be more appropriate to present any aspects of the financing mechanisms (the how) after the milestones have been discussed (the what). Nevertheless, neither the governance structure of the DCI nor the financing mechanism have been properly discussed and agreed upon. As such, any reference to its specific set up and its bodies, beyond what’s in the DCI, such as the Technical Secretariat should be taken out until agreed.

With specific regards to the financing mechanism, this information must be relocated to the IDB fund document and its operation manual. The Implementation Plan is a political document, and intends to lay out the overall strategy to implement the policy milestones set out in the JDI and support the overall REDD+ Strategy in Peru, with funding from multiple sources (public, NGO, international cooperation, private etc.). The financial mechanism established by the IDB is only managing parts of the financial resources, the one that comes from Norway. The scope of the implementation plan is broader than the IDB financial mechanism and the CAPs.

Strategy for accomplishing the deliverables

This section is very much improved from the previous version, and finally gives a description of what Peru plans to do in order to implement phase 2 of the JDI. However, in order to make the plan even clearer, we’d like to suggest that this chapter is slightly restructured:

- Under the "definition" of the milestones, we would recommend that you give a description of the indicator and means of verification and link it with the accomplishment of the milestone in

the JDI. This is done to a greater or lesser degree for each of the deliverables and it would be great to have it for all of them.

- The "Justification" is in general providing a good analysis and problem description. It could however, be given more focus on how the milestone will contribute to reducing deforestation in the short and medium term and as such contribute to the ENBCC. It could further be useful to mention how the specific milestones relate to other public policies and political priorities, e.g. the agricultural policy, the forest policy, indigenous policy, the OECD environmental assessment, the ENBCC, the UN SDG, the NDCs and/ or other relevant policies. As such, it can also help gain political support from the other sectors.
- The "situation and context by the signing of the JDI" also provides a very good description and analysis of the current situation. Make sure that there are good baseline values for each deliverable. See comments to the deliverables below.
- After the "situation and context by the signing of the JDI", we believe the document would read better if you had included a section where you described the existing initiatives and achieved results between 2014 and 2017, including a list of all the existing initiatives and secured funding (also beyond 2017) (public, private, NGO, international cooperation). Then, based on this information, you could do the gap analysis, including all the necessary resources to reach the milestones. Where you identify a budget gap, the implementation plan should reflect on a plausible strategy to attain the needed resources. This could be funding from Norway or other resources. Given the political nature of the JDI, it can also be relevant to flesh out other gaps, e.g. political gaps such as the lack of proper regulations or laws.
- Finally, based on the analysis of existing and planned activities, and identifying necessary budget, budget gap, and other necessary measures to put in place to attain the goal, you could introduce the strategy to close the gap and achieve the milestone. If relevant, explain how the milestones will be reached in terms of specific projects and programs. Where the budget support mechanism will be used, the plan can refer to the six existing budget support programs. If there is no existing budget program, and you think that a budget program is the most cost efficient means of reaching the milestone in due time, you should also state what is needed to design the new budget support programs, and the process to have them established, budgeted and implemented (brief description).
- The strategy could also include additional activities that you deem necessary to include for reaching the milestone, including e.g. strengthening capacities, etc.
- The risk analysis is in general very good. We would also strongly recommend that you include a description on how you plan to mitigate the identified risks. In some cases, mitigation activities may also be included as planned activities, as they are key to reach the results.

Prioritized interventions

The criteria for prioritizing intervention are not clear (chapter 5), and we recommend that prioritizing of activities should be done for all the milestones, not only for the first disbursement. It should be a clear link between the indicator of accomplishment of the milestone and the prioritizing of activities. This is not the case in the present plan.

Complementary support (ayuda complementaria) should be justified in the description of the milestones – e.g. all prioritized activities should contribute to the overall results, and the what, why, how should be described under each milestone.

Deliverables

In the following section, we will comment on each of the phase 2 milestones. In order to make our comments more readable, we have focused on the indicators of compliance (which will trigger Norwegian disbursement) and means of verification.

Deliverable 1

From JDI

2a) Cease authorizations of conversion of forest land (under categories of land use – Forests and/or Protective land) to agricultural use (2015)

Review regulations and strengthen institutional capacities and mechanisms for transparency, leading to implementation of appropriate measures to prevent the issuing of authorization for new conversion of permanent forest state into agriculture, and ensure due diligence in the case of legal activities which requires forests cover to be removed.

Demonstrate the capacity to continually monitor the commitment in the Forest Monitoring and MRV System.

Establish a public private coalition with multinational companies committed to ambitious zero deforestation policies, focusing on the design and implementation of Nationally Appropriate Mitigation Action (NAMA) practices for sustainable production of cocoa, coffee, biofuels, agro fuels/agroindustry, and cattle ranching, improving the use of lands already deforested and avoiding new conversion of forest to agriculture. The companies that do not share these goals through publicly announced and independently verified internal policies, cannot be part of this vision.

Indicators as defined in Entregable 1 V 1 081017

Meta de cumplimiento	Medio de verificación	Comment Norway
Al 2019, un (01) sistema implementado totalmente funcional e interoperable en todas las regiones de la Amazonia Peruana con las diversas fuentes de información que se utiliza en el proceso de autorización de cambio de uso del suelo.	Sistema implementado de monitoreo y seguimiento de autorización de cambio de uso de suelo en la Amazonía, que armonice los procesos de otorgamiento de derechos para la realización de emprendimientos agropecuarios en la Amazonía, con información georreferenciada y articulada al Módulo de Monitoreo de la Cobertura de los	<p>We commend Peru for taking into account our suggestion, and proposing a system / registry for land use authorizations.</p> <p>We suggest to include geographical coverage in the indicator of compliance (Amazon regions).</p> <p>It is strongly recommended to identify a means of verification that demonstrate that the system function, e.g. quarterly reports or similar.</p> <p>As an intermediate results, we suggest including the testing of the system in two regions, e.g. Loreto and Ucayali (2018).</p> <p>Is this system part of the cadastre forestal or cadastre rural? Will it be related to other systems such as SINIA or SNIFF? Will it be established using elements from the Cadastro Ambiental</p>

Meta de cumplimiento	Medio de verificación	Comment Norway
	Bosques (2019).	Rural (CAR) of Brazil?
Componente 1 Marco legal ajustado y validado por las entidades relevantes, relacionado con la normativa que regula la conversión de tierras con patrimonio forestal a uso agrícola (2018).	Normas legales revisadas y promulgadas por las entidades competentes.	<p>With this component, it is important to make sure that appropriate measures to prevent the issuing of authorization for new conversion of permanent forest state into agriculture <i>are implemented</i>. We recommend strong focus on implementation of ensuring that due diligence in the case of legal activities which requires forests cover to be removed takes place. Therefore, it seems appropriate to include means of verification that shows that the revised legal norms are adopted and implemented in the Amazon regions, e.g. a revised and approved and adopted TUPA for each and every one of the Amazon regions, in MINAGRI and MINAM. Is capacity building and information sharing also necessary?</p> <ul style="list-style-type: none"> • We suggest to include as indicator: TUPA revised and implemented in MINAM, MINAGRI and the Regional Governments in the Amazon (2018) • We suggest to include as means of verification a document that describes the TUPA, and a document that demonstrates activities of implementation, e.g. Training workshop with regional environmental authorities, regional agricultural authorities, regional economic development authorities. • Could also include training of private sector and local governments to disseminate information about the new system and the consequences of breach of rules (e.g. what happens when illegal deforestation occurs).
Sistema implementado y articulado al Módulo de Monitoreo de Cobertura de los Bosques.	Sistema de registros y monitoreo de autorizaciones de cambio de uso del suelo.	<ul style="list-style-type: none"> • Include an indicator and means of verification on monitoring and control, e.g. "Coordinación entre MINAGRI y la FEMA, para el abordaje y seguimiento de procesos de deforestación ilegal" • "Numero de procesos legales contra deforestacion ilegal", or similar.

Meta de cumplimiento	Medio de verificación	Comment Norway
<p>"1. Un documento con lineamientos para la reducción de emisiones y acciones de adaptación en el sector agropecuario.</p> <p>2. Documento que orienta acciones de desarrollo sostenible de palma aceitera en la amazonia.</p> <p>3. Documento que contiene prácticas y pautas para la producción sostenible de café a nivel nacional."</p>	<p>"1. Documento(s) público(s) con lineamientos (promueven actividades agropecuarias en la Amazonía) una agricultura sostenible de cacao, café, biocombustibles, y ganadería, evitando nuevas conversiones de tierras forestales a uso agrícola.</p> <p>2. Documento público con una estrategia para adoptar buenas prácticas agrícolas y sistemas de producción sostenible de palma aceitera.</p> <p>3. Documento(s) público(s) que recogen pautas y procesos para asegurar la producción sostenible de café en el ámbito Amazónico. "</p>	<p>The indicators and the means of verification does not respond exactly to the text of the JDI, but we are open to discuss this</p> <p>We would suggest that the indicators and means of verification focus more on implementation. In the JDI, the text is "focusing on design and implementation of NAMAs for cocoa, coffee, biofuels, agrofules/ agroindustry and cattle ranching.</p> <p>We would also suggest that you at least make sure that all the suggested commodities in the JDI are covered with an indicator and/or means of verification.</p> <p>It would be valuable to have a description of how the implementation of these activities will contribute to reduce pressure from agriculture on land use change and contribute to the mentioned production-protection approach.</p>
<p>Establish a public private coalition with multinational companies committed to ambitious zero deforestation policies.</p>		<p>There is no indicator for the establishment of a public-private coalition. Please explain why this has not been included in the implementation plan for phase 2. We would be open to discuss changes in the indicator, if the intention is kept, which is to engage private sector to commit to deforestation-free supply chains.</p>

Additional comments:

Land use capacity (CT CUM)

According to the Forest and Wildlife Law, deforestation is forbidden on the land use categories of F (forest) and X (protection), but can take place on other land categories, when following the rules and procedures in the forest law.

If land use capacity (CT CUM) is identified for the remaining forest of the Peruvian Amazon, what is the risk of increasing the pressure on standing forests on land use categories without F and X?

We are concerned that under the existing legal framework, the land use classifications will provoke an increase in legal deforestation by making clear (through public maps and soil classification databased)

where deforestation authorizations can be given. Unless this activity end up proving that only a very small share of the of Amazon soil is suitable for agriculture on areas not designated for forest production and protection, legal deforestation can rise as a consequence, leaving uncertain how this will affect the deforestation rate all together. As stated in the proposed plan, some 49 % of Peru's standing Amazon rainforest lack soil classification.

There is an ongoing process to include land cover (floristic) as part of the land use classification. When will this process be finalized? Why is it not mentioned in the implementation plan? Will it imply changes in the current law, regulations and procedures of land use classifications and forest zoning? We would encourage you to include more information on the potential risk of deforestation due to soil classification under the existing norms and more information about the existing process of changing the regulations in the plan.

Note that legal deforestation counts as deforestation under the JDI.

Monitoring of land use authorizations

We would like to have more information about the proposed system of land use authorizations. Maybe it would be possible to share the TORs for the ongoing study of this system? (ongoing consultancy – p 4-34).

Reducing the impact from agriculture on deforestation

According to the National Forest and Climate Strategy, the main driver of deforestation is small scale agriculture. There is also evidence of medium to large scale deforestation, increasing recently. Component 3 of deliverable 2a) intends to improve the use of lands already deforested and avoiding new conversion of forests to agriculture, e.g. to strengthen deforestation-free agricultural production in the Amazon (as well as in other parts of Peru).

Reducing the impact from agriculture on deforestation in the Peruvian Amazon, will strengthen the international reputation of Peruvian agricultural exports on medium to long term. At the international level, there is gradually higher demand for deforestation free products. This is already a case for cocoa from Africa. Peru's coffee export could be at risk because of its impact on deforestation, among the most significant in the world, if not addressed now. In general, the agricultural sector is almost absent in the implementation plan, and we would recommend that agriculture is this is better addressed in the next version of the plan, including better description of the impact from deforestation of agriculture, existing policies, how to improving the use of lands already deforested and avoiding new conversions.

While palm oil is an important commodity, there were supposed to be NAMAs for cocoa, coffee, biofuels, agrifuels and cattle ranching, according to the text of the JDI. Even though NICFI acknowledge that there is challenging to implement NAMAs for these commodities, we do think it would be necessary to make sure that national and regional policies and production plans incorporate zero deforestation safeguards and measures, for all the mentioned commodities, at least.

The national plans for coffee, cocoa and cattle ranching could be updated to included safeguards to make sure that these national plans, in elaboration of existing, do not contribute to deforestation and forest degradation. When the plans are updated and validated, Norway could be interested in financing productive activates at regional level, given that there is possible to demonstrate that production is deforestation-free, and that the control and law enforcement is strengthened.

Prevention and control of deforestation

The expected result of deliverable 1 is not only to set up a monitoring system for deforestation authorizations, but to **cease authorizations** on forest lands to agriculture. What kind of measures will be taken in the case of illegal deforestation? Who is responsible for this? Is there a need to improve the capacities, and is there a need to revise and improve the legal framework?

Previos indicator (23.06.2017) was "Número de acciones de coordinación entre MINAGRI y la FEMA, para el abordaje y seguimiento de procesos de deforestación ilegal." Would it be possible to introduce this or a similar indicator to strengthen the control and prevention part of deliverable 1?

Deliverable 2

2b) Produce an assessment of the impact of deforestation and forest degradation on Peruvian Amazon, including logging, mining, agriculture and infrastructure (2015).

Estimate the impact of this deforestation and forest degradation drivers in terms of area and in terms of greenhouse gas emissions, and propose a long term monitoring methodology for these emissions.

Produce recommendations of public policies – through a transparent and inclusive multi stakeholder process, involving all relevant ministries as well as civil society and indigenous and local communities – for the reduction of deforestation and forest degradation caused by mining, agriculture, illegal or non-managed logging, and infrastructure.

Indicators as defined in Entregable 1 V 1 081017

Meta de cumplimiento	Medio de verificación	Comment Norway
Al 2018, un (01) documento de recomendaciones de política para reducir la deforestación y degradación de los bosques a partir de una evaluación del impacto de los motores de la deforestación presentado en el GTM-NDC y validado por el Grupo de Coordinación Intergubernamental de la DC	Documentos de recomendaciones de política para la reducción de emisiones de la deforestación y degradación de los bosques presentado y validado en el GCI	<p>There lacks an indicator and means of verification for the study.</p> <p>What is the formal and institutional status of the " Grupo de Coordinación Intergubernamental de la DCI", and is this the proper instance for endorsing public policies?</p> <p>We suggest that the public policies are endorsed by a proper entity.</p> <p>The General Approach of the of the partnership is based on some principles, among them "give all relevant stakeholders, including local communities indigenous peoples, civil society, and the opportunity of full and effective participation in REDD+ planning and implementation."</p> <p>The GCI does not include participation of civil</p>

Meta de cumplimiento	Medio de verificación	Comment Norway
		society and indigenous communities, and does not respond to the text in the DCI (see text above). Please explain and indicate how you plan to make sure that civil society and indigenous communities has been given the full and effective participation in the achievement of this deliverable, and propose a means of verification.

Additional comments:

Deliverable 2b) consist of two components. In order to comply with all deliverables in phase 2, we need to know how the Government of Peru plan to deliver on both (with indicator and means of verification). The intention with this deliverable is to answer the following:

- What is the impact of **deforestation** from logging, mining, agriculture and infrastructure?
- What is the impact of **forest degradation** from logging, mining, agriculture and infrastructure?
- How does the Government of Peru monitor the impact of these activities in terms of greenhouse gas emissions?
- How does the Government of Peru plan to reduce the impact of these activities?

If the technical document elaborated under the REDD+ MINAM project in 2015 responds to the assessment, please include this document as an indicator. Also, if not mistaken, the document only focuses on deforestation. Do you have similar analysis of degradation?

We understand that the second bullet point refers to the design and implementation of sector plans for mining, agriculture, illegal or non-managed logging, and infrastructure. As such, the policies should be endorsed by, and implemented by the proper instance for public policies.

One of the most important drivers of deforestation and forest degradation that should be properly addressed under this deliverable is infrastructure, and especially the construction of roads in the Amazon. It is striking that the one biggest threat to the achievement of the DOI's main goal of reducing GHG emissions from deforestation and degradation is not mentioned with a single word throughout the proposed plan. The construction of a road right across almost 700 km of rainforest to connect the city of Iquitos in Loreto with the rest of Peru by road, if carried through, will without doubt result in an unprecedented amount of deforestation and degradation in the Peruvian Amazon, through some of Peru's most isolated and pristine rainforest areas. It is even planned to be constructed close to tropical America's largest peatland complex. A plan for the implementation of phase II (the transformation phase) simply cannot ignore this.

Deliverable 3

Reduce by 50% the area of remaining undesignated forest covered land (2017), in a manner that avoid the conversion of forest lands to plantations:

- Areas assigned to indigenous lands.
- Areas assigned for protected areas (national or regional).
- Areas assigned for forest timber and non-timber (permanent production forests, local forests) and agroforestry systems in special use areas.
- Areas assigned for protection forests (bosques protectores) and conservation concessions.
- Areas assigned for reserved forest.

Indicators as defined in Entregable 1 V 1 081017

Meta de cumplimiento	Medio de verificación	Comment Norway
1. Al 2020, 60% de superficie de bioma amazónico contará con ZF (San Martín, Ucayali y Loreto)	Resolución ministerial del MINAM que aprueba el expediente de Zonificación forestal	The indicator does not specifically address unassigned/undesignated forest covered land, and should be revised according to the text in the JDI
2. Porcentaje de bioma amazónico establecido/categorizado/reconocido como ANP, ACR, ACP y/o Reserva Indígena, a partir de setiembre 2014.	Decreto Supremo que establece la ANP y/o ACR Resolución Ministerial que establece la ACP Decreto Supremo que establece la RI	We would prefer a given ha value as indicator, e.g. number of hectares of ANP, number of hectares of ACR etc. Baseline values should be introduced for each category. It should also be given a base line value for the area of remaining undesignated forest covered land as of 2014. Geobosque states 15,3 m ha as <i>no categorized</i> per 2014. As such, 50 % of 15,3 m ha would be the end target. Is Geobosque the official source of information? What is the status of the land of native communities?

First of all, we would like to note that the Spanish wording of milestone 2c) in the implementation plan is different from the Spanish version of the DCI that can be found on the official PNCB website and the language in the implementation plan is different from both the English and the Spanish version. The English version prevails.

As mentioned in the implementation plan, the highest degree of deforestation in Peru occurs on area without any categorization. The intention behind the milestone as such is to categorize 50 % of the uncategorized land to categories as agreed in the JDI.

We note the comment in the implementation plan that the only valid indicator to measure the fulfillment of milestone 2e) should be the degree of completing “*zonificación forestal (ZF)*”¹. Our concern is that the end product of ZE does not include the issuing of rights (*otorgamiento de derechos*), which are key to reduce deforestation.

We welcome the idea to give priority to the categorization of land to *Areas assigned to indigenous land, Areas assigned for protected areas (national or regional), areas assigned for protection forests and conservation concessions*, given that these categories prohibit deforestation.

When the target for each category is set, we recommend to describe the process of achieving the target. This includes forest zoning, but also other processes, depending on the category. A base line value should be set out for each category, as the value of the total area of undesignated rights in 2014 (baseline).

As Indigenous land, we refer to *reservas indígenas* and *reservas comunales*. *Comunidades Nativas* will be regulated under milestone 2d). Currently, as described in the implementation plan, table 8, five proposals exist for establishing new indigenous reserves.

The recategorization of "reservas territoriales" to "reservas indígenas" is indeed important for increasing protection of PIACI. However, we don't understand how "reservas territoriales" can account for "area of remaining designated forest covered land", as they have a category already.

To avoid conflict between indigenous peoples' customary lands and other land categories, categories for indigenous lands under this deliverable (Indigenous Reserves and Communal Reserves) should be given priority. Peru has a history of appropriating land from indigenous peoples for other land use purposes, a practice that under no circumstances should be promoted under this DoI. A specific reference to the ILO 169 must be included in the implementation plan.

Further on, and in the same line as the comment above, no categories can be established on land where indigenous peoples have existing land claims. The case of Ucayali, where forest concessions are given on land where indigenous peoples have claims, cannot be accepted.

When assigning rights to permanent production forest, we highly recommend a revision of the logging regulations to ensure these can guaranty the following: 1. local sustainability, 2. that the degradation of Peruvian forests at large from logging is low, and 3. that expansion of industrial logging into primary forests is avoided.

Peru could also consider to include in this deliverable the elaboration of a map that shows all the proposed and officially approved indigenous lands (of various categories) throughout the Peruvian Amazon, which should be used as a guide to prevent land conflicts. This map should preferably also include native communities (see comments below), and be part on a "one map "for the Peruvian Amazon.

¹ Page 40, 13-15

Deliverable 4

d) Increase by at least 5 million hectares the regularization of indigenous lands, specifically native communities (sum of demarcation plus issuing of land right/title) (2017).

Issuing the land title or land rights assignment (including new or amendments to increase area). Includes property rights over agricultural lands and forest rights over forest and protection lands.

Conduct the delimitation/titling of natives communities in accordance and close cooperation with indigenous peoples' organizations, at all levels.

Indicators as defined in Entregable 1 V 1 081017

Meta de cumplimiento	Medio de verificación	Comment Norway
<p>1. Número y hectáreas de títulos de propiedad para nuevas comunidades nativas georreferenciadas y registradas en SUNARP a partir de setiembre de 2014.</p> <p>2. Número y hectáreas de títulos de propiedad por ampliaciones a favor de comunidades nativas georreferenciadas y registradas en SUNARP.</p> <p>3. Número de hectáreas y de contratos de cesión en uso en tierras de aptitud forestal firmados con las comunidades nativas registrados en la entidad correspondiente.</p> <p>4. Número de acuerdos entre organizaciones indígenas y los responsables de acciones o proyectos de titulación de comunidades nativas.</p>	<p>1. y 2. Títulos de propiedad nuevos a partir de setiembre de 2014</p> <p>3. Contratos de cesión en uso nuevos a partir de setiembre de 2014</p> <p>4. Actas de reuniones o asambleas, documentos públicos, y/u hojas de asistencia de eventos relacionados con la titulación y los contratos de cesión en uso</p>	<p>We propose including the following:</p> <ul style="list-style-type: none"> - A register (cadastre) with information about the indigenous communities (year, haa, number of families, GPS, number in the SUNARP registry), and information about the contract of cesion en uso, digital copy of titles and usufruct contract, copy of the memoria descriptiva física. <p>Map of the Peruvian Amazon that shows all the native communities (before and after 2014).</p> <p>We commend Peru for including an indicator in the "ficha componente" that demonstrates the participation of indigenous peoples (#actas de la asamblea comunal mencionando organizaciones indigenas). These meetings usually take place during the demarcation briefing of communities. The documents are signed by all participants and include also information on how many women and men participated.</p>

The specific indicator of compliance corresponds well to the intention behind the milestone – see some minor revision in language. We further commend Peru for including an indicator for participation of indigenous peoples organization at community level in the "ficha componente". Information about participation could also be included in the "Sistema de Titulacion"/ Registry.

Even though the participation of indigenous communities is included as an indicator, the involvement of the indigenous peoples organizations in the process is critical, and they would additionally be able to mitigate the several of the risks, or assumptions, identified. How will the Peruvian government ensure that the various projects have included sufficient funds and procedures to ensure their involvement?

The implementation plan also includes a financing table indicating that already ongoing initiatives or planned initiatives that have been fully funded, will finance the fulfilment of the 5 million ha, including support from international cooperation, and public funding.

Given that this is the most ambitious and most important milestone of the JDI, the one that receives most national and international attention, it is highly recommended to elaborate a more thorough strategy for how Peru shall be able to title this high amount of indigenous communities on such a short time. The ambition is very good, but could be even better if followed up with a convincing strategy. We thus recommend that you include in the plan, proposals for how to make the title process for indigenous communities significantly quicker and less bureaucratic.

If needed, such a plan, or rather strategy, could be included as an 2018-intermediate indicator. We further recommend that the strategy include a revision of the final evaluation of the project WWF-DCI, and the UNDP project and other existing ongoing projects, to incorporate important lessons learned and recommendations.

We value the description of problems related to overlapping land rights. We are keen to see the determination and presentation of the regularization from SERFOR that will clarify the procedures related to overlapping land rights. This should be included as a 2018 intermediary indicator.

The implementation plan should include a process of regulating SURNAP's Ministerial Decree for avoiding conflict between indigenous communities' demands and other land categories (page 59). This is an important policy measure for avoiding continued "land-grabbing" at the expense of indigenous peoples. The regulating of this Ministerial Decree is recommended to include as a 2018 intermediary indicator.

According to table 14 (describing the different initiatives invested in the implementation of law 22175), no further financing is needed to reach the 5 million ha objective. However, the financing plan for 2018-2020 (table 19) asks for additional funds under to set up a Sistema de Titulacion de Comunidades Nativas. The reasoning is explained at page 53 (21-26). It would be valuable if the implementation plan could reflect on how this system would relate to other systems related to forestry and REDD+, such as the SNIFF, catastro forestal, catastro rural or other existing systems, .

The chapter includes an honest analysis and description of present status, risks and gaps. One of the risks account to the lack of capacity among the CCNN to attain other services, such as credit and training in community forestry. We believe this point deserves further reflection. How can we secure that the amount of deforestation within titled CCNN slows down? Management plans and planes de

vida might be some options to further consider. Currently only areas without categorization sees a higher level of deforestation than CCNN.

Concerning the assumption that other entities will not receive titles to land that is currently occupied by CCNN, we would encourage the government to present mitigating actions to prevent this from happening. The case in Ucayali is very unfortunate.

One question related to PTRT3: What are the basis for the estimates that PTRT3 use? According to table 14 PTRT3 will reach 3 million ha with a per ha cost that is well below the average of the others. It would be useful to describe how the different projects contribute to the process other than the direct titling process.

Means of verification has been discussed with MINAGRI. We propose the following (see also in the table above):

- o A register (cadaster) with information about the indigenous communities (year, haa, number of families, GPS, number in the SUNARP registry)
- o Information about the contract of cesion en uso
- o Digital copy of titles and usufruct contract
- o Copy of the memoria descriptiva física
- o Map of the Peruvian Amazon that shows the 5 mill haa.

Make sure that the planned activities of support to DGDISPACR does not overlap with PTRT3 and GIZ.

We recommend to include information about gender, participation of indigenous communities and level and risk of conflict (CIFOR and UNDP could provide good information on this).

Final, please revise the sentence on page 53: " Con estos números aproximados de comunidades se cerraría la brecha de demanda de titulación de las comunidades, con las cuales se cumpliría el entregable de cinco millones de hectáreas." Given that the number of communities proposed in the plan is lower than what is proposed by Indigenous Organizations, and that Peru simply cannot know for certain whether or not there are more indigenous communities in the Peruvian Amazon that lack title, you have to be careful that such a statement can be misinterpreted.

Deliverable 5

e) Include at least 2 million hectares in the payment for conservation performance of indigenous communities (conditional direct transfers under the Forest Conservation Program, and other schemes) – (2016)
 - Registry of all communities included in the programme.
 - Inclusion of the monitoring of the areas assigned for conservation in the forest monitoring and MRV system.

Meta de cumplimiento	Medio de verificacion	Comment Norway
Al 2017, dos (02)	"1. Reporte de	We think that the indicator and the means of

Meta de cumplimiento	Medio de verificación	Comment Norway
millones ha de bosque de comunidades nativas bajo el mecanismo de TDC con un sistema de monitoreo y vigilancia por GeoBosques.	superficie de GeoBosques, a partir del nivel de información que contiene los polígonos geo-referenciados de las áreas comprometida para la conservación bajo el mecanismo de Transferencia Directa Condicionada del Programa Bosques u otros mecanismos de pago/incentivo monetario o no monetario, por resultados de conservación. 2. Convenios de afiliación firmados con las comunidades nativas que se hayan incorporado al mecanismo Transferencia Directa Condicionada. 3. Reporte de actividades de fortalecimiento de capacidades de comités de vigilancia y patrullaje priorizados según el nivel de amenaza de deforestación. "	verification are well defined, but we recommend to differentiate between the TDCs and other incentive schemes.

In the milestone and in the proposal for implementation plan for phase 2, you mention "other schemes" and "algún mecanismo de pago/ incentivo monetario/ no monetario".

- Please explain what kind of schemes and systems that exists, and that will contribute to fulfilling deliverable 2e).

The National Forest Conservation Program and the Conditional Direct Transfers, has a duration until 2020. How do you ensure sustainability of the program in the following years?

f) Implementation of the FIP Investment Plan projects according to existing project plans by 2016 at the latest, with a view to accelerate implementation if practicable.

Indicators are well defined. We commend Peru for taking into consideration previous comments that also shows actual implementation of the FIP.