
[The PIREDD/Plateaux REDD+ Project in Mai-Ndombe, DRC: Conflicts and a Complaint Mechanism](#)

This article is part of the publication [15 Years of REDD:](#)

[A Mechanism Rotten at the Core](#)

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The project discussed in this article is part of one of the biggest jurisdictional REDD+ initiatives in the world: the PIREDD/Plateaux REDD+ Project. Like most REDD+ projects, it features a complaints mechanism. Stories from affected communities reveal the false promise that this mechanism would help hold the project accountable towards those affected by it. The design of the complaint mechanism has systematically failed to resolve the communities' complaints. But then, why does this mechanism exist?

The Democratic Republic of Congo (DRC) has the biggest tropical forest area in Africa and, therefore, it is particularly targeted by REDD+ proponents such as the World Bank and conservation NGOs. The story they have told over the past 10-15 years is that forest-dependent people in the DRC are to blame for deforestation and that REDD+ projects will reduce this. That story misidentifies the key drivers of deforestation and targets communities, not the logging or mining industries, with restrictions on how they can use their forest. The result is both a rising rate of deforestation and numerous conflicts between communities and REDD+ project proponents (see, for example, [this WRM bulletin article](#)).

The DRC government adopted its REDD+ strategy in 2012, not least to pave the road to more funding from the World Bank and others. An investment plan to make the REDD+ strategy operational was elaborated for the period 2016-2020 and several legal instruments related to REDD+ were adopted.

This article focuses on a project that is part of one of the biggest jurisdictional REDD+ initiatives in the world: the PIREDD/Plateaux REDD+ Project in the province of Mai-Ndombe. (1) Like most if not all REDD+ projects, implementation of the project has caused conflicts with communities whose land use was restricted by the project. Again, like most if not all REDD+ projects, the PIREDD/Plateaux REDD+ Project features a complaints mechanism. Although this mechanism is supposed to make a REDD+ project accountable towards those affected by it, in reality, the set-up of the mechanism makes it impossible to hold the project implementer accountable.

The failure of the complaints mechanism described in this article thus raises a broader question about the role that such mechanisms play in generating donor and public acceptance for REDD+ initiatives which claim to be participative. The dysfunctionality of the

PIREDD/Plateaux REDD+ Project complaints mechanism is not a mere question of poor implementation. Contrary to the claimed idea behind its design, the complaints mechanism is implemented in a way that does not work and fails to resolve the communities' complaints.

The PIREDD/Plateaux REDD+ Project

The province of Mai-Ndombe encompasses 12.3 million hectares, of which 80% is covered with forests. In 2016, the World Bank's Forest Carbon Partnership Facility (FCPF) approved US\$13.1 million dollars for the PIREDD/Plateaux REDD+ project. It is the main component of a larger amount of funding agreed upon with the DRC government. The PIREDD/Plateaux REDD+ project is the first phase of the Mai Ndombe REDD+ programme and is considered the most advanced jurisdictional REDD+ initiative in DRC. It is being implemented in four administrative areas (Mushie, Kwamouth, Bolobo and Yumbi).

The NGO WWF is the so-called 'local implementing agency', with responsibility for putting into practice the project in these four areas. With the stated objective to "reduce pressure on forests", project activities focus around reforestation, agricultural and fire control. (2) The activities are part of the so-called Improved Management Project of Forested Landscapes (PGAPF, for its French acronym). In return for planting seedlings and protecting savannahs, communities are promised results-based payments, monetary benefits for delivery of the community providing a service such as the maintenance of agricultural feeder roads or setting up of a timber yard. Payments are supposed to be paid annually by the World Bank's Forest Investment Program (FIP), through WWF as intermediary.

For the interaction with communities, WWF set up Local Development Committees (CLDs) in each village. The CLD represents communities, acts as community contact point for project implementers, submits complaints and receives and distributes payments to community members for specific tasks. The project is tasked with setting up 175 such CLDs. Each community inside the project area is expected to prepare a Natural Resource Management Plan. The plan would identify among others, areas to be protected and where trees should be planted.

Conflicts with communities

The DRC government claims that one of the pillars of DRC's REDD+ strategy, besides reducing deforestation, is improving living conditions of the poorest and most vulnerable people in the country.

Research carried out by a network of grassroots groups and supported by the Congolese organisation Action pour la Promotion et Protection des Peuples et Espèces Menacées (APEM) in partnership with the Rainforest Foundation UK (RFUK), however, suggests that the reality is far from that aspiration. They met with people in more than twenty communities in the Mushie, Bolobo and Kwamouth administrative areas in 2018-19. During their meetings with women in particular, a long list of problems and conflicts related to the REDD+ project was exposed. The list includes:

- Women are not allowed to continue traditional agricultural practices

During the meetings women described how they traditionally manage savannahs. After ploughing the plot they plan to use for cultivation, [small fires](#) are set to burn the grasses that have been dug up. The [small fires](#) also create an ideal environment to collect mushrooms, fruits, caterpillars, leaves, and other crops. With the REDD+ project prohibiting these controlled burns, families are cut off from vital food sources. Women in the Bosina community denounced the lack of space to cultivate food crops in the savannahs. There were no consultations with the community on using those areas for REDD+

reforestation activities. As a result, women now have to walk much longer distances to find areas where they can grow manioc. Most of these locations are forested and thus women require the help of men to clear them. This creates not only a new dependency that women did not face before, but it also leads to more deforestation. As a result of the REDD+ project, the women's production of manioc has fallen. Women from the village of Maa explained how being prohibited from using the savannah takes away other sources of food and income too, in particular the collection of mushrooms. The REDD+ project has worsened the economic situation of families. This in turn impacts on, for example, their ability to pay for their children to go to school. At the same time, the risk of food insecurity and diseases has increased. Similar situations were described by people in other villages, including Bompensele, Mbala II, Camp Ferrera, Twa à Kwamouth, Lovwa, Nkô, Mbali and Bopaka.

- No payments for reforestation activities

The women from the communities of Bosina and Komambi reported that they have not received any money for the reforestation of fast-growing tree species and fruit trees which they planted for the project.

- Inadequate choice of tree species for reforestation

Members of the community of Maa exposed that the fast-growing species chosen by the project, like acacia and eucalyptus, are not in the interest of the communities. Women argued that they collect dead wood as firewood to cook for their families and do not need acacia or eucalyptus trees for that.

- No payments for road maintenance

Even though members of the community of Komambi worked in road maintenance and finalized their clearly defined task, they haven't been paid for this work. People living in the communities of Maa, camp Molart and Komambi reported the same problem. They explained that their work was even signed off by project representatives but, nevertheless, they did not receive their payments.

- Delayed payments for providing 'environmental services'

The payments to community members in Bosina categorized as 'environmental services' (protecting the savannah through suppression of [bushfires](#)) have not been paid out for two seasons. The communities of Masiambio, Lovwa, Komambi, Bompensele, Mbala II and Maseke also report delayed payments for their bushfire suppression work. In June 2019, after suffering from food scarcity due to having to abandon their fields for work on the bushfire suppression and the land allocation under the Natural Resource Management Plans and because they had still not received the payments, communities decided to protest by burning savannahs they were supposed to protect under the project. In the community of Maa, the chairperson of the CLD, who signed the contract with the REDD+ project around these payments, added he feels threatened due to this situation. The communities of Masiambio, Lovwa, Bosina, Bompensele, Komambi and Maseke also complained about delayed payments for making fire-breaks.

- Payment contracts unilaterally decided by WWF

The chairperson of the CLD in Komambi explained that the contracts of the REDD+ project to pay community members for their services to the project are unilaterally decided by the REDD+ proponents. He explained that he had no assistance to help him and the community to assess the terms of the contracts proposed by the project. Members of the Lovwa community added that while there is no stipulation of a fine or an adjusted amount to be paid in case of delayed payments from the project, the contract does foresee penalties for communities who do not fulfil their work well, in this case: suppression of [bushfires](#).

- Payments extremely low

Community members in Komambi complained about the very low payment for the bushfire suppression and maintaining the firebreaks: US\$5 dollars per hectare per year. Members of the community of Maa also reported that they receive very little in return for several project activities they are engaged in. They argued that with the pastoralist and share-cropping activities that they used to do before the project, they earned much more. They explained that that was one of the reasons not to be part of the REDD+ project anymore.

- Lack of transparency in selecting the facilitators of the committees and chair of the CLD

Members of the community of Lova criticized the lack of transparency in how the facilitators of the different groups within the Local Development Committee (CLD) were selected by the REDD+ project. Many communities exposed that they were not given the opportunity to elect their CLD chairpersons. They also reported a lack of financial reporting from the CLD to their communities. These problems have been communicated to WWF, however the NGO has not intervened and the problems continue.

- Exacerbating longstanding land conflicts

The REDD+ project promoters have exacerbated a longstanding land conflict on the boundaries between the Komambi and Maa communities. As part of creating the Natural Resource Management Plan for each community, REDD+ promoters produced a map that allocates part of Komambi's customary land to the customary land of the Maa community. This eventually reignited the longstanding land conflict and has led to a court case.

- Creating new land conflicts

A new sensitive land conflict arose when the maps produced as part of the Natural Resource Management Plan for each community were created. The boundary shown on the map between the Mongana and the Nkó villages was incorrect. Although both communities know exactly where the boundary between their customary territories is, authorities of both communities have seen the maps with the wrong boundaries. Members of the community of Nkó explained that this has led to more mistrust between the two communities, also because the REDD+ project promoters have not corrected the problem by revising the maps. Another land-related complaint was mentioned by the Chief of Masiambio who explained that their tenure rights over their customary land have not been respected. Similarly, in the Nkuru community, the villages refused to sign the minutes of the validation of the Natural Resource Management Plan because it allocated part of their land to the community of Hebi. (3)

- Lack of information and participation

Community members of Bosina reported that they had no participation in the elaboration of their Natural Resource Management Plan. Members of the community of Komambi added that they were not even consulted about the project in the first place. Besides, they denounced that WWF often uses another community, Maa, to represent them. The chief of the Maa community in turn said that he never gave permission for the project. After consulting with the members of his community, he decided to write a letter and communicate that his community does not want to be part of the REDD+ project anymore. Villagers from Mongana stated that they did not know what the PIREDD/Plateaux REDD+ project is, and the community researchers found that only 20% of the village population consulted inside the PIREDD/Plateaux REDD+ had ever heard about REDD+.

A Dysfunctional Complaint Mechanism

In theory, established complaints mechanisms should become a very important tool in cases where

conflicts arise, or rather, a last resort for communities to count on some accountability on their promised and agreed social benefits and rights. **The exposed dysfunctionality of the complaints mechanism of the PIREDD/Plateaux REDD+ Project questions the real purpose of these complaints mechanisms in REDD+ projects overall.** Are these really set up to resolve conflicts that arise from project implementation? What are the interests behind establishing such mechanisms?

In 2014, when the DRC government was still undergoing the preparatory phase of the REDD+ process, the World Bank paid US\$5.2 million dollars to the government in order to operationalize the REDD+ [safeguards](#), including a complaints mechanism. Four years later, in 2018, the government decree n°047 of 9 May 2018 sets out the procedure for the approval of REDD+ investments in the DRC and the safeguards and standards to be developed. The decree also states that a mechanism for managing complaints and appeals is an imperative to the process. The national REDD+ standards awaiting validation include this in principle 3: REDD+ activities shall minimise loss and damage, provide for redress and put in place mechanisms for fair and equitable redress of any loss and/or damage suffered by communities and other stakeholders. However, according to official information from 2020, the mechanism is still in an experimental phase.

Yet, REDD+ promoters give the impression that complaints mechanisms are well established and functioning. The World Bank's Forest Investment Program (FIP) has elaborated a model of how the complaints mechanism should function for its REDD+ projects, composed of seven detailed steps of how complaints should be received, assessed, investigated and dealt with. (4) The PIREDD/Plateaux REDD+ project claims that it has built the capacity of communities about the complaints mechanism.

But the field visits coordinated by APEM showed that communities have not been fully informed about this mechanism, they do not know how to use it and do not have the necessary assistance or guidance. The result is that in practice, the complaints mechanism is not really accessible for those negatively affected by the REDD+ project. The visits also showed that those local authorities identified as the entities tasked with receiving and processing complaints are not informed and/or not willing to process the complaints they receive.

The complaints mechanism was designed without the communities that should benefit from it in the first place. Therefore, it is designed to the benefit of the party against whom a complaint is presented. For example, ways to facilitate that communities can present their complaints by, for example, having the information and forms available in local languages, are lacking. Another example is that there are no clear definitions around deadlines, access to information and transparency in the overall procedure. The field visits also noted that among the 26 villages visited only the chairs of the CLDs of Bosina and Nkô knew about the complaints mechanism.

All of this indicates that **the real intention and interest was not in creating an accessible complaints mechanism in the first place. The result has been the strengthening of unequal power relations. The façade of a mechanism that has been created works to the detriment of the complainants: the communities. The complaints mechanism's development and design is another example of the top-down approach that defines the whole architecture of REDD+.**

Testing the Mechanism

The APEM team decided to support several communities in testing the functioning of the complaints mechanism. They helped communities to present official complaints to the competent authorities, ensuring that the complaints were prepared and presented in line with the complaint mechanism

guidelines. The communities in dialogue with APEM opted to focus on issues such as the recognition of customary land rights; the lack of space for women to cultivate their food crops; the top-down selection of tree species for reforestation; the non-participatory ways of producing maps in each of the communities; the absence of community participation in the project; and the lack of proper information to communities and/or the lack of consent to the REDD+ project.

The communities of Komambi and Maa were the first to present their complaint to the competent authority in Mushie on 10 November 2019. Initially, their complaint was refused, with the explanation that the mechanism was not yet operational. After the complainants insisted, the person who did not want to receive the complaint the first time around presented another argument: He claimed that he had not received any guidance on how to deal with complaints and that he had not received any complaint so far.

After insisting for 5 days, the complaint was finally received and a confirmation handed over to the complainants. The confirmation document, however, lacked a registration number to clearly identify the complaint that had just been submitted. The complainants were only given a verbal promise that the complaint would be looked into. Apparently, nothing happened afterwards. During a visit to the FIP office in Kinshasa on 18 December 2019 to obtain information on the status of the complaint, the '[safeguards](#)' officer stated that he had not received any complaints.

Final remarks

The case of the PIREDD/Plateaux REDD+ Project shows that **all these years and millions of dollars spent on supposedly preparing countries for implementing REDD+ projects in line with the [safeguards](#) adopted at UN climate conferences for preventing conflicts and human rights violations, have been largely wasted.** The social problems and local conflicts have systematically appeared since the first REDD+ projects took off almost 15 years ago (5). Besides, preliminary analysis in the PIREDD/ Plateau REDD+ Project shows that the project's activities have not decreased annual forest loss.

This case also shows that REDD+ promoters are definitely not concerned about communities and what they have to say about defending the forest. REDD+ promoters like the World Bank and WWF impose their own ideas and plans. They do not seem to have any concern about protecting communities from social, cultural, economic and environmental impacts and human rights violations in general. [Safeguards](#) have remained paper work. Even worse, they open the door for more conflicts when existing conflicts remain unsolved and REDD+ proponents can claim they use social and environmental standards for their [offset](#) projects.

The bottom line is that complaint mechanisms and discussions around [safeguards](#) seem to work very well to ensure donors can keep funding conflict-prone and controversial schemes like REDD+. **These fake complaints mechanism creates the appearance of accountability for when something goes wrong. The reality is that there is no intention to be held accountable because conflicts are unavoidable under the reality of REDD+ implementation where communities are blamed for deforestation and face imposition of land-use changes and restrictions.** This also ignores that these communities have managed these same forests well and protected them without third party intervention. If that is the intention of REDD+ projects, **why would anyone expect that a complaints mechanism functions to resolve the very conflicts arising from what the REDD+ project pursues - the land-use restrictions on communities?**

Prince LUNGUNGU

(1) Article based on the information from the unpublished APEM report “Retour d’expérience de suivi des plaintes et recours des communautés locales dans la mise en œuvre de la REDD+ dans la Province de Mai-Ndombe en République Démocratique du Congo : Cas de PIREDD/Plateaux” (Feedback from the monitoring of complaints and appeals from local communities in the implementation of REDD + in the Province of Mai-Ndombe in the Democratic Republic of Congo: Case of PIREDD / Plateaux). The information in the APEM report is based on several field visits by members of the NGO during 2018-2019 to communities in the PIREDD/Plateaux REDD+ project. The visits were undertaken to understand if and how the project's complaints mechanism is functioning. For further information see also “[REDD-MINUS: The Rhetoric and Reality of the Mai Ndombe REDD+ Programme](#)”, Norah Berk and Prince Lungungu, December 2020

(2) WWF, [REDD+: PIREDD-plateaux, an encouraging model in the fight against deforestation in the DRC](#).

(3) Of the 24 Natural Resource management Plans that were prepared in the territory of Bolobo, 9 were validated / approved without objection, 11 were validated / approved by communities under condition that errors be corrected and in four cases, communities refused to approve the Plans due to the severity of the conflicts that the Plans had created. These conflicts continue to this day.

(4) Programme d'investissement pour la Forêt de La République Démocratique Du Congo PIF RDC.

(5) [REDD: A Collection of Conflicts, Contradictions and Lies](#).

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