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Collective comments on the draft Viet Nam Forestry Development Strategy for the period 2021-2030, with a vision to 2050



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KfW, Center for International Forestry Research (CIFOR), and World Agroforestry (ICRAF)

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On behalf of the

German Federal Ministry for Economic Cooperation and Development (BMZ)

1. CONTEXT

The Viet Nam Forestry Development Strategy (draft strategy) for the period 2021-2030 with a vision to 2050 marks an innovative development for the forestry sector. The draft strategy has been circulated extensively to stakeholders for their comments. This document summarizes key perspectives of four international organizations including GIZ, KfW, CIFOR and ICRAF to the draft strategy with a view to providing additional information and analysis for further improvement of the draft strategy based on our existing knowledge and experiences. We hope these analysis and recommendations will be useful inputs for the Viet Nam Administration of Forestry during finalization of the strategy.

2. COLLECTIVE COMMENTS ON THE DRAFT STRATEGY

We acknowledge and are impressed by the new ideas mentioned in the draft strategy that align with global development trends such as “*urban forestry*” (in the Environment Objective part, page 3), “*development of agroforestry policy*” (in the Economic Object part, page 3), “*development and expansion of ecosystem services following market mechanism and in-dept and width international integration*” (in the Vision to 2050 part, page 6) and development of “*a mechanism for strategic monitoring based on intended objectives in order to ensure objectivity, the evaluation should be conducted by independent organizations and agencies, including international organizations and non-governmental organizations*” (In Part 6, Section on Monitoring and Evaluation, page 20).

In addition, we would like to contribute further analysis and recommendations drawn from our international experiences and lessons learnt in implementing and monitoring conservation initiatives in Viet Nam to further improve the draft strategy to ensure its effectiveness and relevance to global development trends as well as to align with numerous international commitments that Viet Nam has acceded to (Table 1).

Table 1. Issues that need further consideration in the draft strategy

Issues mentioned in the draft strategy that need to be reconsidered and refined	Difficulties, challenges in implementation/issues to be considered and clarified	Recommended amendments for considerations
PART 1: VIEWPOINT, DIRECTION FOR DEVELOPMENT		
Viewpoint 2: “To rapidly and sustainably develop forestry.” (Page 2)	To the society, the most important value of forest resources is natural ecosystem services. Forest restoration, biodiversity conservation and ecosystem services enhancement take time. Rapid forestry development means not letting these natural processes take enough time as usual and undermining the social process to engage different stakeholder groups as well.	It is recommended that this statement be amended to say “ <i>To sustainably develop forestry in order to restore and conserve ecosystem services</i> ”
Viewpoint 3: To sustainably build forestry upon the achievements in the previous period.	According to Article 3 of the Law on Forestry 2017, sustainable forestry is viewed as a participatory process, which is able to contribute to national sustainable development objectives (objective 16).	It is recommended that this statement be specified to say: “ <i>To sustainably build forestry upon the previous achievements from the previous period, to engage the</i>

		<i>participation of organizations, communities and individuals; with interests of the State, localities and people being harmonized, principle of gender equality being complied... "</i>
PART 2: OBJECTIVE		
"By 2025 and 2030, the number of violation cases against legal provisions on forest protection will not have exceeded that of 2020."	An increase or decrease in the number of violations mainly represents law enforcement outcomes. It does not clearly and fully demonstrate environmental objectives. For example, it is possible that the number of violations decreases, these violations are on a large scale with widespread impact. In this case, it is impossible to prove a good performance in forest protection and development.	It is recommended that this objective be replaced with other objectives, for examples: <ul style="list-style-type: none"> • To maintain forest area or increase forest reserves • To increase the biodiversity value per each certain forest area unit • The targeted number of endangered, rare and precious fauna or floral species that are removed from the Red List or not to let the populations of endangered and vulnerable species reduce any further. • To expand and, maintain various natural forest landscapes of quality at a minimal level of XXX hectares as for special-use forests and protection forests. • To restore at least XXX % of the total of natural protection forests of critical importance towards being multi-functional forests that can provide multiple forest environmental services.
"To ensure an inclusive and equal participation of all economic sectors and social organizations ..."	<ul style="list-style-type: none"> • This statement does not include and refer to an important actor group- the forest owners, particularly communities who are managing religious forests, or forests to protect the community's water resources. • Gender equality is one of the 17 sustainable development goals (SDGs) that Viet Nam has committed to achieving and it is a focus of priority in the national REDD+ Action Plan. However, it is not at all mentioned in this draft strategy indicating an inconsistency between this strategy and the other policies 	The following objective needs to be added to the strategy: <i>"To improve the institutional framework for the forest owners system, especially those that are communities; respect their traditional cultural identity, be people-oriented, improve forest owners' capacity so that they can manage, protect and develop forests effectively"</i> <ul style="list-style-type: none"> • Gender should be better mainstreamed in the strategy target and objectives related to gender equality in a concerted way with other current policies.
To apply "Sustainable forest management (SFM) and improve the quality of natural production forests."	The Law on Forestry 2017 and Decree 156 stipulate that SFM must be applied in all three forest categories.	It is recommended to amend this statement to say <i>"to apply Sustainable forest management,</i>

		<i>forest restoration and improve the quality of all 3 categories of forests”</i>
“In the period 2021-2025, arrangements will be made so that 60% of households residing in SUFs will have been resettled in a stable manner and by 2030, this proportion will have reached 100%.”	The 2017 Law on Forestry stipulates that the State shall ensures that ethnic forest dependents minorities and communities are allocated forest on land for production and can cooperate with forest owners to protect and develop forests, are entitled to practice their cultures, religions...	It is recommended to amend this statement to say " <i>In the period 2021-2025, arrangements will be made so that 60% of households residing in special-use forests will have been resettled in a stable manner and have livelihood based on a participatory approach and consensus and by 2030, this proportion will have reached 100%.</i> "

PART 3: BREAKTHROUGH IDEAS IN THE STRATEGY

- The most important solution is the forestry sector’s restructuring programme towards modernization/digitalization in terms of land, natural resource management, organizational approach in management, and management along a value chain, incorporating the value of ecosystem services into national accounting systems. However, these issues have yet to be mentioned clearly in this part of the strategy.
- The links between the strategy and other international commitments need to be added to this part, of which the most important is the Nationally Determined Contribution (NDC) and REDD+ that are currently omitted. Viet Nam has a national programme on REDD+ and REDD+ is mentioned in Viet Nam’s NDC as a main pillar of Viet Nam’s contribution to global efforts to mitigate impacts of climate change. There are major programmes such as Reduction of Emission in the North which is supported by FCPF. Another project applying for funds from the Green Climate Fund to be located in the Central Highland region also focuses on REDD+. However, in the strategy, objectives and solutions mentioned in the REDD+ programme (NRAP) and REDD+ Programme at provincial level (PRAP) are not mentioned. It is necessary to integrate REDD+ in the part presenting the objective and solutions of the strategy in order to mobilize funding sources for the strategy’s implementation in order to ensure integration with sector’s policies while realizing international commitments that Viet Nam has made under the Paris Agreement.
- Benefit-sharing policies including Public Private Partnerships and the sharing of financial resources from PFES are important breakthrough points and compulsory requirements for Viet Nam so as to participate in REDD+. However, the strategy has yet to mention these issues in the suite of political and social solutions. These need to be clarified to ensure a consistency with international commitments that Viet Nam has acceded to.

PART IV. DIRECTION, TASKS, MAIN SOLUTIONS

Development of forestry by territorial regions.	Agroforestry is only mentioned in two territorial regions- North West and Central Highland while the development potential of this model is seen in all regions, especially the South Central region where agroforestry can play a pivotal role in restoring degraded- / drought-affected land.	Agroforestry should also be applied in all territorial regions.
The task of forestry development. Part (a) Sustainable forestry development.	Incorporating the value of ecosystem services into national accounting systems has yet to be mentioned.	It is necessary to incorporate the value of ecosystem services into national accounting systems as a sustainable forestry development objective. At the same time, to add to the strategy new research/studies to

		identify the contribution of ecosystem services to the economy, the findings of which would inform the process of incorporating ecosystem services in the country's economic account systems.
<p>Part 2: The task of forestry development</p> <p>a) to sustainable forestry development:</p> <p>- <i>plantation of protection forests, special-use forests, which is targeted to reach 4,000-6,000 ha/year.</i></p> <p>-<i>Restoration of protection forests, special-use forests, which is targeted to reach 150,000 ha/year.</i></p>	<ul style="list-style-type: none"> • In fact, the available land area for forest plantation in special-use forests, protection forests is scarce, if they exist, such pieces of land are often scattered and located in difficult-to-access terrain. • It remains unclear whether the objectives for restoration is to enhance the forest area or improving forest quality or both and therefore needs further clarification. • It is unclear that whether the target of 150.000 ha is for one year or for the period 2021-2030. 	<ul style="list-style-type: none"> • It is necessary to review the areas in special-use forests and protection forests that are suitable for afforestation. • It is necessary to consider both expanding the area of special-use forests and protection forests and improving their quality. • If the target is 150,000/year, it appears feasible but if it is the target for the whole period 2021-2030, it is too low given the fact that according to findings from a review, more than 70% of protection forests are currently of low quality and in need of restoration.
<p>Viet Nam's commitments in its NCD for the implementation of Paris Agreement on mitigation of climate change impacts are mentioned in Part 3 on solutions (section 3.7 on international cooperation, page 72).</p>	<p>The strategy currently has yet to set forward a clear direction and specific quantified objectives in the form of criteria/targets for development and CO2 reduction in development activities.</p>	<ul style="list-style-type: none"> • Relationship between the current criteria regarding areas of different forest categories (forest coverage proportion) and the criteria regarding storage / reduction of CO2 emissions based on objectives in Viet Nam's NDC (total reduction of between 8-25% of CO2 emissions in 2030 as a joint effort of all sectors and contribution of the forestry sector) should be identified. • Political and social solutions should reflect the commitments that the Vietnamese Government has made under the Paris Agreement including solutions to ensure safeguards, non-carbon benefits, and benefit-sharing, and resolving causes leading to deforestation and degradation.
<p>Solutions on human resources development.</p>	<ul style="list-style-type: none"> • Community forestry is currently considered as a subject in the training institutions' curriculum but is mentioned only once in this part of the strategy. • However, community forestry is an important policy trend in the world and Viet Nam has made 	<ul style="list-style-type: none"> • It is necessary to consider and integrate community forestry not only in the part about solutions but also the part on viewpoints and objectives. Emphasis should be placed on the perspective of sustainable forestry development

	<p>great efforts and commitments in ASEAN to foster policy for community forestry development as an important objective of the forestry sector.</p> <ul style="list-style-type: none"> • Currently, training and capacity development subjects mentioned in the strategy have yet to reflect the market demand and trends in the coming 30 years. For example, changes in the approaches to forest products and new forest related industries (e.g. cosmetics, the sector's contribution to the social security and other sectors including health care, the real estate, the market of software applied in the forestry sector). 	<p>including the development of community forestry.</p> <ul style="list-style-type: none"> • At the same time, it is necessary to include community forestry in the Strategy through refining current environmental, socio and economic objectives. For example, environment objectives can include forest area effectively managed by communities); social objective can include the number of communities that can participate and benefit from the community forestry policy); and economics objectives can include the number of communities implementing community forestry increasing their incomes). • In capacity development, the current draft strategy gives a strong focus on enhancing traditional biophysical skills while do not address the future global needs and demand. Forestry education needs improving and tailoring to meet future global needs.
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PART V. DEMAND FOR FUNDING, FUNDING SOURCES, DIRECTIONS FOR FUND MOBILIZATION

	<p>Currently, the strategy has yet to clarify the main sources of funding or priority activities in each forest category.</p>	<p>The direction for fund mobilization must be based on the accessing to new funding sources (e.g. carbon market, commercial emissions markets, green economics, equity and stock markets for forests, REDD+) to expand current stable and sustainable income sources (PFES) and integration of ecosystem services and biodiversity in planning.</p>
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VI. MONITORING AND EVALUATION

	<p>Currently the strategy does not clearly define the mechanisms or regulations regarding time, frequency of monitoring and evaluation, or funding sources for this activity.</p>	<ul style="list-style-type: none"> • In terms of monitoring and evaluation, it is necessary to determine clearly the process, frequency as well as financial resources. The agencies responsible for implementation and reporting about the monitoring and evaluation results also need to be determined. • It should be emphasized that that technology should be applied at the highest level in monitoring and evaluation.
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