SAFEGUARDING
THE FUTURE OF REDD+
VIETNAM RISK ASSESSMENT

Transparency International is the global civil society organisation leading the fight against corruption. Through more than 90 chapters worldwide and an international secretariat in Berlin, we raise awareness of the damaging effects of corruption and work with partners in government, business and civil society to develop and implement effective measures to tackle it.

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INTRODUCTION

Our planet is warming at a faster rate than it ever has, as a result of a high concentration of heat-trapping gases in the atmosphere. The burning of fossil fuels is the number one cause of global warming. The second is deforestation. Trees absorb carbon dioxide and retain it for as long as they live. Cutting down trees means that that carbon is released back into the atmosphere.

REDD+ (Reducing Emissions from Deforestation and Forest Degradation) is a UN-initiated scheme that aims to reduce the contribution that deforestation is making to climate change, essentially by paying tropical forest-rich countries not to cut down trees. There are two main ways in which this can happen. The first is fund-based: communities receive money as compensation for conserving forests, which they might otherwise depend on. The second is mechanism-based - the carbon that is stored in forests is represented by carbon credits which are sold on carbon markets. People or organisations that want to reduce their emissions impact can do so by purchasing REDD+ credits and a certain percentage of the proceeds are given to forest-dwelling communities.[1]

With around 40 per cent of the country covered by forest, Vietnam is a key target country for REDD+ investments. It has been estimated that the scheme could generate about US$80-100 million a year[2] equalling around half of the country's annual health sector budget.

REDD+ has also played a prominent role in national planning in Vietnam in recent years, prompting a number of changes aimed at putting in place a suitable framework to guide REDD+ development in-country.[3] In January 2011, the Ministry of Agriculture and Rural Development also established the Standing Office of the Steering Committee for the implementation of REDD+ in Vietnam.

REDD+ related finance began to flow into Vietnam in March 2009, when US$4.4 million was approved to implement the UN-REDD programme. Vietnam is also receiving bilateral funding for its readiness activities from the governments of Finland, Norway and Japan.[4] These activities are designed to get Vietnam 'ready' for REDD+ - to develop REDD+ policy and the required institutional infrastructure, to design a Measurable, Reportable and Verifiable carbon accounting system and formulate reference levels, and to initiate stakeholder consultations and awareness raising processes. Once this has been achieved, REDD+ funding proper can begin to flow.

However, whilst REDD+ is seen as having enormous potential as part of a global climate change strategy, challenges may lie ahead. Vietnam's forestry sector has been beset with illicit activity in recent years.[5] The country also scores a poor 31 on Transparency International's 2012 *Corruption Perceptions Index*, which ranks countries on a scale of 0 (highly corrupt) to 100 (very clean) according to how corrupt their public sector is perceived to be.[6] Given the potentially significant flows of money involved, these trends suggest that corruption could pose a significant threat to the successful governance of the programme should effective anti-corruption safeguards not be built in from the outset.

Towards Transparency (TT), Transparency International's (TI) national contact in Vietnam, is working to ensure that this happens. It is advocating for forestry-related government agencies to adhere to high standards of transparency and accountability, and to enable civil society to effectively monitor integrity in REDD+ mechanisms. Under these conditions, TT believes that REDD+ payments will be far more likely to meet their intended objectives.

TT recognises that there has been some movement towards instituting necessary reforms to avoid corruption in REDD+.[7] However, anti-corruption measures tend only to be evidenced on paper. This is a key point to be aware of, as Vietnam has traditionally had weak anti-corruption enforcement. TT therefore felt it necessary to conduct a more in-depth analysis to help identify how to translate laws and policies into reality.

This document sets out a summary of the main findings of this analysis carried out by TT between September 2011 and July 2012. It is not an assessment of concrete corruption cases but rather a risk assessment that diagnoses risks so that they can be proactively addressed before large sums of money begin flowing. The assessment points to specific weaknesses in policy and practice, with a view to assisting TT and other concerned groups in identifying priority areas for reform and appropriate advocacy and policy interventions. This information also provides benchmarks for measuring further developments in-country. If undertaken iteratively over time, the assessment could be used as a monitoring tool to evaluate overall progress or regress. In order to ensure an effective link between assessment and policy reform, the assessment embraced a participatory approach, providing opportunities for stakeholder input and engagement throughout.

This document sets out a brief description of the methodology, followed by a summary of the main findings of the analysis, and a series of conclusions and recommendations for reform.

METHODOLOGY

TT's research was guided by a methodology developed by TI and included in the manual *Keeping REDD+ clean: a step-by-step guide to preventing corruption* [8], which provides a framework to identify and prioritise the corrupt practices that pose the greatest risk to REDD+ — practices that have the greatest impact and are the most likely to occur. Within this framework, corrupt practices are clustered under five key risk components: policy, legislation and regulations, financial and economic flows, application activities, reporting and monitoring, and enforcement (see box 1 below). Finally, the manual helps users analyse existing anti-corruption instruments whose implementation should be monitored in order to assess changes in the highest-risk practices.

Box 1
Key risk components

Policy legislation and regulation: This refers to the overarching policies that govern how actors within the sector operate. REDD+ policy and regulation will be developed and will have a significant impact on forest carbon projects. New legislation may also be introduced to address carbon trading schemes.

Financial and economic flows: REDD+ finance is intended to provide compensation to the state or landowner for potential lost revenue. It should also cover the costs of managing and maintaining the standing forest. The revenue chain relates to four main streams: the

funding provided up front for project or strategy development (from donors, NGOs or private actors), the revenue that should occur once proof of performance has been established, the fees and taxes paid on this revenue, and how funds from all three are used to benefit those currently relying on the forests for their livelihoods.

Application activities: In developing and implementing both a forest carbon project and a national level strategy, many decisions and activities must be undertaken, including for example the setting up of governance systems, the hiring of staff and the implementation of safeguards.

Performance monitoring and reporting: The reporting chain, with transparency as a mechanism of accountability and a fundamental component of good governance, should help ensure the operation of the other four activity areas mentioned here. Within both forest carbon projects and national REDD+ development, there will be some reporting on carbon sequestration at the international level as well as (if required) at the national level.

Enforcement: This process is fundamental to both good governance and the sound functioning of all other thematic areas. Robust enforcement relates not only to forestry or carbon based regulations but also wider labour and environmental regulations. It involves a large number of actors including forestry agencies, zoning boards, the police, customs, finance ministries, government auditors and the judiciary.

TT first had to adapt the methodology to its local context. This was achieved through desk-based research, and consultation meetings with key stakeholders involved in REDD+ and anti-corruption at both central and local levels (see footnote for a list of stakeholders consulted).[9] This was supplemented by a number of field visits to Lam Dong and Son La provinces, all of which have pilot REDD+ or Payment for Environmental Services activities. The subsequent implementation phase consisted of six workshops at both national and provincial levels. Here, a risk map of potential corruption risks for REDD+ was drawn up by identifying together with these stakeholders key concerns for corruption in REDD+, assessing and prioritising them. The highest scoring risks were analysed in-depth in order to understand the underlying causes and possible solutions. These are explored in more detail in the next section.

Finally, the research process involved a desk study of existing laws, regulations, anti-corruption tools and initiatives, local conditions in the forestry sector, and proposed solutions to reduce or prevent corruption in REDD+ implementation. This involved four training workshops for government officers at provincial and district levels and consultancy meetings with key REDD+ stakeholders to discuss which solutions might be best applied in the Vietnam context.

FINDINGS

REDD+ policy and practice is still under development in Vietnam. However, because the scheme falls under the national forestry programme in Vietnam, research participants felt that it would inherit many of the same risks as more longstanding forestry projects such as the Payment for Forest Environmental Services Programme, the 327 Re-Greening Uplands Programme, and the Five Million Hectare Reforestation Programme. As such, they focused on identifying key corruption risks in the forestry sector and considering how these could be relevant in REDD+ development and implementation in terms of policy, legislation and regulations, financial and economic flows, application activities, reporting and monitoring, and enforcement.

OVERVIEW OF RISKS

Participants used a scale of 0-25 (25 representing the greatest risk) to score activities' risk severity. Risk severity was calculated by multiplying scores awarded for two criteria - the likelihood of a risk occurring (1 being rare and 5 almost certain) and the degree of impact of that risk should it occur (1 being no impact and 5 being irreparably undermined).[10]

All activities raised as a concern are set out in table 1 below. Activities that participants scored over 16 are then considered in greater detail in the tables that follow.

Table 1
Risk severity by key risk component

POLICY LEGISLATION AND REGULATION	SCORE (25 = GREATEST RISK)
Design and development of national REDD+ strategy: REDD+ strategy is designed that is preferential to specific actors involved in REDD+ implementation.	20
Land use planning and land allocation for REDD+: Determination of land area for REDD+ is influenced by elites and the ruling party at central and local levels.	20
Design of benefit sharing mechanism: Rightful landowners do not receive a fair proportion of the benefit due to inadequate consultation as a result of influence exerted by those with vested interests.	12

FINANCIAL AND ECONOMIC FLOWS	SCORE (25 = GREATEST RISK)
Coordination and approval of donor REDD+ funding: Funding is allocated unfairly and improperly as a result of corrupt practices.	16
Allocation of funds for internal capacity building to ministries and agencies: Recipients of REDD+ funds engage in corrupt practices to receive funds. This results in the diversion of funds at various levels for personal or professional gaine of donor and investor funds.	20
Allocation of finance to ministries and agencies for REDD+ implementation: Recipients of REDD+ funds engage in corrupt practices to receive funds. This results in the diversion of funds at various levels for personal or professional gain.	20

APPLICATION ACTIVITIES	SCORE (25 = GREATEST RISK)
Registration of project: Projects that are not real or do not contribute to reducing emissions are registered.	20
Procurement of goods and services: The procurement process is manipulated so that goods and services are procured at a higher price than their value and the difference syphoned off.	20
Appointment of new staff: Staff are appointed to new positions created under REDD+ on the basis of corrupt practices rather than their qualifications.	8
Establishment of new governance structures/ agencies: New governance structures or agencies are set up so as to benefit certain individuals or groups who might not be qualified for their role.	12
Development of national reference emission levels and national carbon stock maps: The standard and quality of the national reference emission level is manipulated.	12

PERFORMANCE MONITORING AND REPORTING	SCORE (25 = GREATEST RISK)
Monitoring revenue: Poor monitoring practices lead to revenues being syphoned off.	12

Reporting performance: Performance reports do not reflect accurate performance.	16
Verification: Verifications are awarded without grounds.	16
Due diligence and monitoring activities: Monitoring and due diligence activities are not carried out correctly.	16

ENFORCEMENT	SCORE (25 = GREATEST RISK)
Enforcement of donor agreement: Donor agreements are not adequately enforced, leading to the abuse of funds.	12
Enforcement of national legislation: National legislation is not enforced and is taken advantage of by certain groups for their own benefit.	16
Prosecution and trial: Prosecutions and trials are not conducted properly and those responsible for abusing REDD+ do not receive punishment.	20

MOST SEVERE RISKS

The activities highlighted above as posing the greatest perceived risk to the effective implementation of REDD+ in Vietnam are explored in greater detail below.

POLICY LEGISLATION AND REGULATION
Design and development of national REDD+ strategy

Overarching policies and regulation need to be developed to govern how REDD+ actors and institutions operate. Existing forest laws and procedures will be relevant, but new legislation may also be introduced. In Vietnam the Ministry of Agriculture and Rural Development (MARD) is responsible for developing the national REDD+ strategy, in consultation with a broad range of stakeholders through the national REDD+ network and steering committee.

Risk: A REDD+ strategy would be designed that is preferential to specific actors involved in REDD+ implementation such as supply companies, NGOs, State Forest Enterprises and the Forest Protection Management Board. As a result, those who are intended to benefit from REDD+ - including forest dwelling communities who live in and protect the forest - will miss out thereby undermining the purpose of REDD+.

Potential corrupt practices:

- State capture through the design of a national REDD+ strategy that is preferential to elites.
- Undue influence and bribery of officials to ignore information.
- Bribery or fraud by international consultants to influence REDD+ planning and gain contracts.
- Abuse of discretion/cronyism in the allocation of concessions based on personal associations or patronage networks.

Land use planning and land allocation for REDD+

This involves developing plans for where REDD+ activities can take place within the country. The Ministry of Natural Resources and Environment (MONRE) leads on land use planning. MONRE also coordinates with the MARD to direct and guide provincial people committees (PPCs) to review and accomplish the land allocation.

Risk: The determination of land area for REDD+ might be influenced by elites and the ruling party at central and local levels. This could result in REDD+ being undermined as areas which could provide the greatest impact on emissions reduction through their inclusion could be left out.

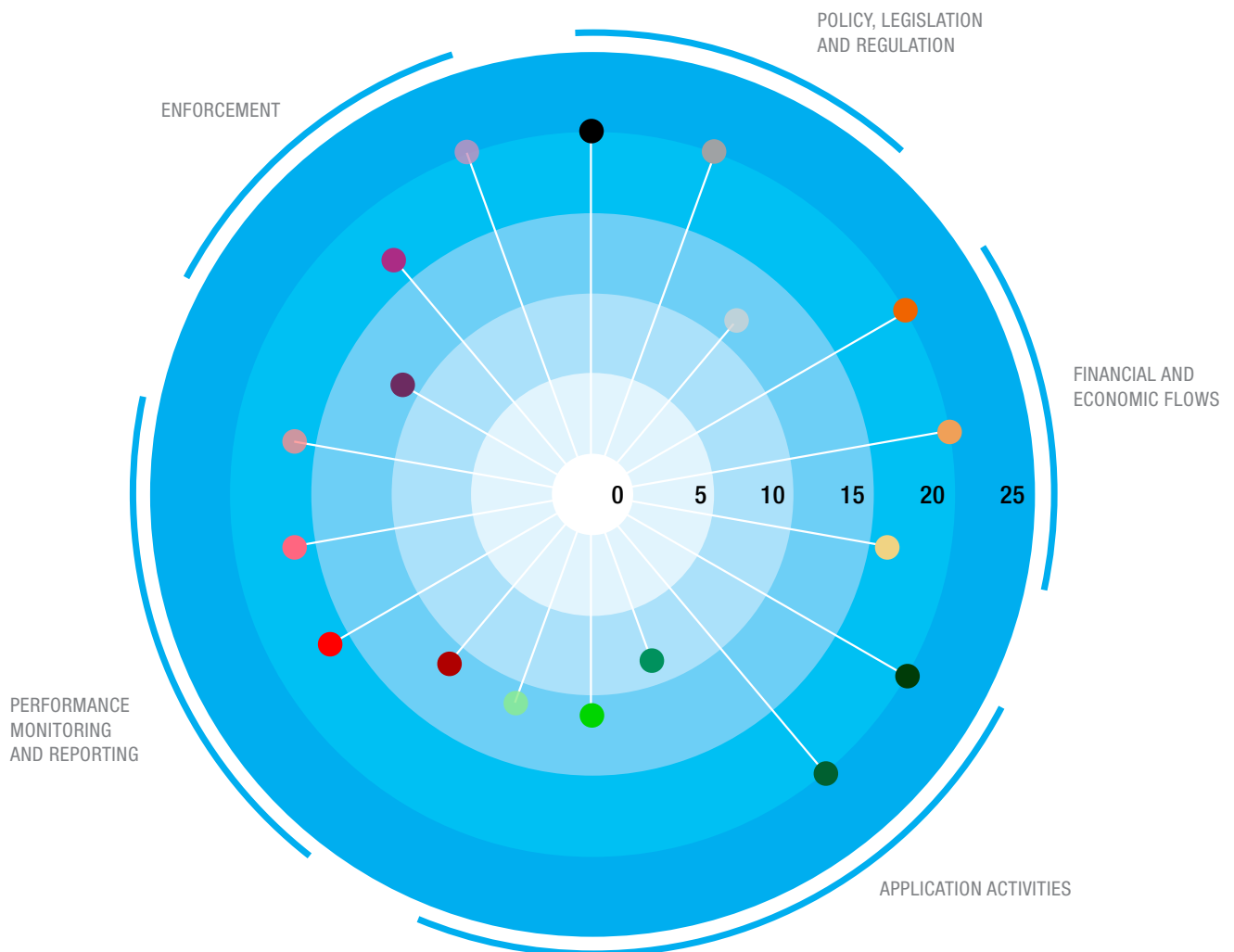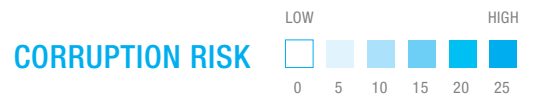**Potential corrupt practices**:

- Undue influence and bribery of officials to access information in land use planning and land allocation for REDD+.
- State capture through a failure to recognise the customary land tenure of indigenous people and forest dependent communities.
- Abuse of discretion/cronyism to allocate land to a preferred group or patronage networks.
- Abuse of discretion in land use planning for forest conversion.

FINANCIAL AND ECONOMIC FLOWS

Coordination and approval of donor REDD+ funding

Currently in Vietnam, the Ministry for Agriculture and Rural Development manages REDD+ grants and loans from donors. It is responsible for making funding applications as well as reporting to donors on the use of funds. It also has a number of departments and directorates that aim to ensure that REDD readiness activities take place.

RISK SCORE CARD

CORRUPTION RISK

LOW ___ HIGH
0   5   10   15   20   25

POLICY, LEGISLATION AND REGULATION

ENFORCEMENT

FINANCIAL AND ECONOMIC FLOWS

PERFORMANCE MONITORING AND REPORTING

APPLICATION ACTIVITIES

0   5   10   15   20   25

ACTIVITIES

POLICY LEGISLATION AND REGULATION	● LAND USE PLANNING AND LAND ALLOCATION FOR REDD
	● DESIGN AND DEVELOPMENT OF NATIONAL REDD+ STRATEGY
	● DESIGN OF BENEFIT SHARING MECHANISM

FINANCIAL AND ECONOMIC FLOWS	● ALLOCATION OF FINANCE TO MINISTRIES AND AGENCIES FOR REDD+ IMPLEMENTATION
	● ALLOCATION OF FINANCE TO MINISTRIES AND AGENCIES
	● COORDINATION AND APPROVAL OF DONOR REDD+

APPLICATION ACTIVITIES	● REGISTRATION OF PROJECT
	● PROCUREMENT OF GOODS AND SERVICES
	● APPOITMENT OF NEW STAFF
	● ESTABLISHMENT OF NEW GOVERNANCE STRUCTURES
	● DEVELOPMENT OF NATIONAL REFERENCE EMISSION LEVELS AND NATIONAL CARBON STOCK MAPS

PERFORMANCE MONITORING AND REPORTING	● MONITORING REVENUE
	● REPORTING PERFORMANCE
	● VERIFICATION
	● DUE DILIGENCE AND MONITORING ACTIVITIES

ENFORCEMENT	● ENFORCEMENT OF DONOR AGREEMENT
	● ENFORCEMENT OF NATIONAL LEGISLATION
	● PROCSECUTION AND TRIAL

Risk: Funding would be allocated unfairly and improperly as a result of corrupt practices. As a result, those who are intended to benefit from REDD+ - including forest dwelling communities who live in and protect the forest – will miss out thereby undermining the purpose of REDD+.

Potential corrupt practices:

- Bribery and collusion/fraud to approve reports that show inaccurate information, falsify documents or hide information.

Allocation of funds for internal capacity building to ministries and agencies

Managing and maintaining REDD+ requires investment in staff and institutions at local and national levels. Relevant bodies in Vietnam include MARD and its departments and directorates, MONRE and the PPCs at the local level.

Risk: Recipients of REDD+ funds will engage in corrupt practices in order to receive funds. This results in the diversion of funds at various levels for personal or professional gain. As a result, those who are intended to benefit from REDD+ - including forest dwelling communities who live in and protect the forest – will miss out thereby undermining the purpose of REDD+.

Potential corrupt practices:

- Fraud, bribery and kick-backs, with fund recipients providing incorrect information to get REDD+ funds.
- Government authorities receiving bribery or kickback money from recipients to approve REDD+ funds.
- Embezzlement of REDD+ funds achieved through faking invoices and other documents and using false beneficiaries.
- Collusion with recipients to grant the funds and exertion of political pressure in order to influence the approval process.

Allocation of finance to ministries and agencies for REDD+ implementation

REDD+ will be implemented on the ground through MARD and the PPC's. REDD+ is currently being piloted in Lam Dong Province.

Risk: Recipients of REDD+ funds will engage in corrupt practices in order to receive funds. This results in the diversion of funds at various levels for personal or professional gain. As a result, those who are intended to benefit from REDD+ - including forest dwelling communities who live in and protect the forest – will miss out thereby undermining the purpose of REDD+.

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- Fraud, bribery and kick-backs, with fund recipients providing incorrect information to get REDD+ funds.
- Government authorities receiving bribery or kickback money from recipients to approve REDD+ funds.
- Embezzlement of REDD+ funds achieved through faking invoices and other documents and using false beneficiaries.

- Collusion with recipients to grant the funds and exertion of political pressure in order to influence the approval process.

APPLICATION ACTIVITIES

Registration of projects

In Vietnam it is not yet clear where project developers will have to register REDD+ projects. It is however likely to involve one of or a combination of MONRE, MARD, the Ministry of Planning and Investments (MPI) and local departments of these ministries.

Risk: Projects that are not real or do not contribute to reducing emissions are registered. This could result in REDD+ being undermined as REDD+ finances will be diverted to projects which do not contribute to the reduction of emissions.

Potential corrupt practices:

- Bribery to receive and implement the project.
- Fraud in terms of providing the wrong information.

Procurement of goods and services

Goods and services likely to be procured for REDD+ are measurement equipment, seedlings, verification companies, companies to provide security services for REDD+ sites etc. MARD is the body likely to be responsible for this.

Risk: The procurement process could be manipulated so that goods and services are procured at a higher price than their worth and the difference syphoned off. In this way, finance that should be going towards the protection of forests is diverted and the incentive for protection reduced again undermining REDD+.

Potential corrupt practices:

- Fraud involving buying cheap and low quality goods but presenting invoices for higher quality products.
- Cronyism/collusion in leaking bidding information, providing weak bids or splitting the bidding package to benefit individuals or a certain group.
- Collusion between bidding contractors in order to raise prices.

PERFORMANCE MONITORING AND REPORTING

Verification

MARD, as lead agency on REDD+ implementation will also lead and coordinate with MONRE to develop and operate the system of measurement, reporting and verification (MRV).

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Risk: Verifications would be awarded without grounds as a result of limited capacity, poor accountability of related officers, and poor ethics at leadership level. This could result in REDD+ being undermined as REDD+ finances will be diverted to projects which do not contribute to the reduction of emissions.

Potential corrupt practices:

- Collusion for verifications where they should not be granted.
- Fraud to falsify findings and intentionally use incorrect information.

Due diligence and monitoring activities

As for verification, MARD in consultation with MONRE is responsible for putting in place the relevant mechanisms for monitoring. This is on-going.

Risk: Monitoring and due diligence activities would not be carried out correctly. Poor accountability mechanisms were pointed to as relevant here, as well as limited capacity. This could result in REDD+ being undermined as REDD+ finances will be diverted to projects which do not contribute to the reduction of emissions.

Potential corrupt practices:

- Collusion in order to hide relevant information or to avoid complying with regulations.
- Fraud through the deliberate misrepresentation of results or falsifying findings.

Reporting performance

As for verification and monitoring, MARD in consultation with MONRE is responsible for putting in place the relevant mechanisms for performance reporting. This is on-going.

Risk: Performance reports would not reflect accurate performance. This would result in under-performance being hidden, with REDD+ funding again being diverted from where it can make most difference to activities not contributing to its goals.

Potential corrupt practices:

- Fraud/ abuse of discretion to establish misleading or false reports on carbon emissions reductions and other performance actions for personal gain.

ENFORCEMENT

Enforcement of national legislation

Enforcement involves a large number of actors including forestry agencies, the police, the finance ministry, government auditors and the judiciary. A lack of enforcement would mean that a variety of actors including loggers, project developers and public officials would have little incentive to abide by REDD+ laws and standards thereby undermining its effectiveness.

Risk: National legislation would not be enforced and would be taken advantage of by certain groups for their own benefit. In this way, it will be difficult to enforce laws and regulations in place to ensure REDD+ achieves its objectives.

Potential corrupt practices:

- Undue influence, bribery, cronyism and abuse of discretion in order to take advantage of legal loopholes to benefit certain groups or individuals.
- Collusion with inspectors and public investment supervisory boards to commit fraud and embezzle funds. Collusion with law enforcement agencies was also raised as a concern.

Prosecution and trial

Holding actors to account for wrongdoing in Vietnam involves the police force, the judiciary and in the context of REDD the donor community. Wrongdoing could result in the removal of REDD+ performance-based payments, the retraction of donor funds, fines and imprisonments.

Risk: Prosecutions and trials would not be conducted properly and those responsible for abusing REDD+ would not receive punishment. This was underpinned by a lack of transparency in law enforcement in Vietnam. In an environment of impunity, there will be no disincentive to avoid wrongdoing thereby leaving REDD+ open to further abuse.

Potential corrupt practices:

- Fraud through falsification of records.
- Bribery, cronyism and abuse of discretion to exploit legal loopholes.
- Collusion with law enforcement agencies to falsify records, ignore certain prosecutions and pursue false ones, or reduce sanctions.

CONCLUSIONS

Seven key underlying concerns emerged from TT's research and should be addressed in order to ensure against the potential corruption risks identified above, and to guarantee that REDD+ contributes to emissions reductions and benefits forest dwelling communities. These issues are summarised below. Recommendations for how they may be addressed by public sector, private sector and civil society actors are outlined in the next section.

Capacity: Low capacity and motivation in relevant government departments/agencies was highlighted as a major cause of ineffective governance or corrupt abuse. This was a particular concern in relation to performance monitoring and evaluation, where corrupt acts might go undetected.

Transparency: Underlying the majority of the risks identified was the problem of poor transparency. This is also linked to limitations on **information disclosure** which has been identified as a challenge both internally in government and externally to the public. In such an opaque system, there is very little chance to hold relevant parties to account.

Overlapping laws: There are considerable overlaps in laws and in the mandates of different government ministries and departments. This, combined with poor transparency and information disclosure, has led to the possibility of legal loopholes being exploited without detection.

Entrenched **cronyism** in Vietnam has meant that powerful or influential individuals can manipulate processes to ensure that policies are formulated in their interest and to the exclusion of more vulnerable parties.

Linked to this is the failure on the part of the government to carry out broad, transparent and comprehensive stakeholder **consultations**. These are important for developing fair and effective policy that incorporates necessary anti-corruption safeguards and builds on examples of good practice. Consultations also help ensure that citizens are actively engaged in monitoring efforts to prevent, identify and report corruption at all points along the REDD+ chain.

RECOMMENDATIONS

For government:

- Strengthen the capacity and motivation of national and provincial law enforcement agencies to ensure that they exercise their roles transparently and accountably.
- The Ministry of Agriculture and Rural Development should implement tools to promote transparency and accountability in order to close the door to bribery, collusion and abuse of discretion.
- At the provincial level, the Lam Dong Provincial People's Committee should allow the piloting of practical tools to be implemented in REDD+ communities.

- Promote the role of the People's Inspection Boards, Community Investment Supervising and mass organisations, and help increase their capacity to engage in the monitoring of REDD+.
- Develop a mechanism to encourage forest whistleblowers.
- Pilot forest integrity pacts in Lam Dong province to prevent corruption in public contracting. These pacts are agreements between the government agency offering a contract and the companies bidding for it that they will abstain from bribery, collusion and other corrupt practices for the extent of the contract. To ensure accountability, Integrity Pacts also include a monitoring system typically led by civil society groups (often a TI chapter).
- Better educate agencies, government officers and local communities about anti-corruption in REDD+ and the forestry sector.

For Transparency International and other civil society actors in Vietnam:

- Conduct more targeted research and organise additional training activities at the community level to define how select anti-corruption tools can be best implemented.
- Pilot a number of selected tools in local areas and share best practices and lessons learnt in Vietnam and internationally.
- Contribute to anti-corruption policies being developed in Vietnam more broadly and work with other regional TI Chapters and stakeholders to share experiences on improving transparency in REDD+ implementation.
- Conduct advocacy campaigns and communication activities to raise public awareness on anti-corruption in REDD+ and the forestry sector.
- Strengthen networking with government bodies, NGOs and other organisations on anti-corruption activities.

For other stakeholders involved in REDD+ and Forestry[11]:

- Join in the consultation meetings and pilot of selected anti-corruption tools for the REDD activities at the local level.
- Help monitor REDD+ policy development and implementation.
- Collaborate in the capacity training, public awareness raising activities.
- Share experience and lessons learnt to systematically improve the effectiveness of anti-corruption tools in REDD+ and forestry.

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[1] It should be noted that REDD+ is not gaining universal support, with some parties voicing outright rejection of REDD+ (Lang, 2012) and others voicing significant concerns.(The Rainforest Foundation, 2012).

[2] UN-REDD (2010).

[3] In December 2010, the Prime Minister issued Decision No. 2284/QD-TTg to request ministries and provinces to gradually integrate REDD+ into socio-economic development plans and strategies starting in 2011. Following that, in March 2011 the Minister of Agriculture and Rural Development (MARD) issued a Directive No. 809/CT-BNN-KHCN to request relevant agencies at central and local levels to integrate climate change activities in their strategies, master plans and actions, including REDD+ activities for the period from 2011-2015. MARD also prepared the national REDD strategy which was approved by the Prime Minister on 27th of June 2012.

[4] For more information on funding for REDD+ readiness in Vietnam visit the REDD desk country profile for Vietnam at; http://www.theredddesk.org/countries/vietnam/financing

[5] Environmental Investigation Agency (EIA) (2011) Crossroads: The Illicit Timber Trace between Laos and Vietnam, available at http://www.reddmonitor.org/wordpress/wpcontent/uploads/2011/08/EIA-Crossroads-report-FINAL-low-1.pdf1.pdf (accessed January 17th 2013).

[6] Transparency International (2012), *Corruption Perceptions Index* (CPI), Berlin, Germany. Available at: http://cpi.transparency.org/cpi2012/results/ (accessed January 17th 2013).

[7] To date, the government has committed itself to implementing REDD+ through a fully participatory approach (UN-REDD Programme Document). The UN-REDD program has also supported the establishment of a National REDD+ Network, which is supported by a Technical Working Group and five sub-technical working groups, each of which has a government and non-government co-chair. Anti-corruption in REDD+ is one of the topics discussed during the regular meetings of these groups. In the National Action Programme on REDD+, the need to address corruption in REDD is clearly recognized, as well as the role of third parties and mass organisation to monitor the programme. More generally, the government has also begun to adopt anti-corruption reforms that could be of benefit to REDD+. These include the Laws on Complaints and on Denunciations from 2011.

[8] Transparency International (2012)a, Keeping REDD+ Clean; A step-by-step guide to preventing corruption., Berlin, Germany available at http://www.transparency.org/whatwedo/pub/keeping_redd_clean (accessed January 17th 2013).

[9] Stakeholders consulted included UN- REDD, Winrock International, Centre for International Forestry Research (CIFOR), Netherlands Development Organization(SNV), the Ministry of Agriculture and Rural Development (MARD), the Ministry of Environmental and Natural Resources (MONRE), Lam Dong Provincial People Committee (PPC), the Department of Agriculture and Rural Development (DARD), the Department of Environmental and Natural Resources (DONRE) and Inspectorates and the Office of the Central Steering Committee on anti –corruption at national and local level, CSOs and other organisations active on REDD+ and anti-corruption.

[10] See Transparency International 2012a, pp. 60-64 for further details.

[11] Such stakeholders include NGOs such as CSDM, SRD, RECOFTC, WWF; research institutions such as CIFOR, forest companies as well as citizens.