

## **REDD+ policy design and policy learning**

The emergence of an integrated landscape approach in Vietnam

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6 REDD+ Policy integration, policy failure, and policy  
7 learning: Cross-level dynamics in Vietnam  
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## 1. Introduction

Reducing emissions from deforestation and degradation (REDD+) was first proposed at the 11<sup>th</sup> Conference of Paris (COP 11) in 2005, and adopted at COP 15 in Copenhagen in 2009. Subsequent policy measures and guidance for REDD+ in participating countries were formalized under the Warsaw Framework for REDD+, and at COP 21 (UNFCCC, 2014). Over this time, REDD+ has evolved to encompass a broader set of objectives, such as reducing emissions through the conservation and enhancement of carbon stocks, and sustainable forest management. To receive results based payments for these objectives, participating countries must develop a national REDD+ action plan, establish emission reference levels, develop effective monitoring, reporting and verification systems, and ensure that all REDD+ actions comply with the UNFCCC safeguards for social equity and participation, and the conservation of biodiversity (UNFCCC, 2014). These efforts are often steered by the UN-REDD organization, the World Bank’s Carbon Partnership Facility, and international NGOs. Donor funding is required to build capacity for REDD requirements at the country level, but it is assumed that once REDD program elements are in place, participating countries will be able to receive payments from an international carbon market (UN-REDD, 2015).

Despite early optimism and enthusiasm, there is significant debate about the effectiveness and viability of REDD+. REDD+ has been far costlier to implement than originally anticipated, and uncertainty associated with the sustainability of long term donor funding, and the efficacy of “performance based” financial incentives for addressing the complex drivers of carbon emissions (Boucher, 2015; Fletcher et al., 2016; Lund et al., 2016). Operationalizing multilevel monitoring, reporting, and verification (MRV) and financial benefit distribution systems is also challenging, particularly in countries with weak and fragmented institutions (Karsenty and Olongolo, 2012; Korhonen-Kurki et al., 2013; Wells and Carrapatoso, 2017). There are also concerns that REDD+ may result in the centralization and “carbonization” of environmental governance, with implications

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64 for social equity and biological conservation (Vije et al. 2013). Other scholars are more optimistic  
65 about REDD+'s viability and its potential for improving environmental governance in developing  
66 countries (Minang et al., 2014; Turnhout et al., 2017). In contexts where there is domestic political  
67 commitment and enabling institutional variables, REDD+ financing and incentives may provide an  
68 impetus for policy reform and cross-sectoral coordination (Gupta et al., 2016). "Landscape"  
69 approaches to REDD+ are increasingly being recognized for their potential to promote integrated  
70 land use planning, participatory decision-making, and climate change adaptation (Turnhout et al.,  
71 2017). Indeed, there is an emerging consensus that policy integration and coherence is essential for  
72 realizing REDD+'s promise of transformative change for forest governance (Atela et al., 2016;  
73 DiGrigorio et al., 2017; Lima et al. 2017; Korhonen Kurki et al., 2015). Yet there are often  
74 significant challenges for the design and implementation of integrated policies in complex  
75 multilevel environmental policy domains, and lessons to be learned from both failures and  
76 successes (Howlett, 2012; Loft et al., 2017; Vince, 2015).

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92 In this paper, we investigate REDD+ policy processes at national and subnational scales of  
93 REDD+ governance in Vietnam through the lens of policy integration, policy failure, and policy  
94 learning. Policy failure and policy learning frameworks are useful for identifying procedural and  
95 technical barriers for integrated policy design and implementation, and their relationship to policy  
96 learning and policy change (Howlett, 2012; May, 1992; Vince, 2015). However, there has been  
97 little investigation of the cross-scale dynamics associated with policy failure and policy learning in  
98 complex multilevel institutional settings. Vietnam provides an excellent case study in which to  
99 explore these themes as they relate to REDD+ governance. Vietnam was the first country to  
100 develop a national REDD+ Action Plan, and it has been highlighted for its progress in capacity  
101 building, benefit distribution, and MRV (Hoang et al., 2013; Minang et al., 2014; Ochieng et al.,  
102 2016). However, there have been challenges for policy integration, questions about REDD+'s  
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124 viability and effectiveness, and setbacks and delays for implementation (Ankersen et al., 2015;  
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126 McElwee, 2017; Pham et al., 2014). The United Nations REDD+ (UN-REDD) and the World  
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128 Bank's Forest Carbon Partnership Facility have also taken different approaches to REDD+ policy  
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130 design at subnational levels of governance, which provides an opportunity to investigate and  
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132 compare different REDD+ design and implementation approaches (FCPF, 2014; UN-REDD,  
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134 2015a).

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137 This research is structured by two objectives. Our first objective is to investigate policy  
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139 process failures and successes at national and sub-national levels of REDD governance in Vietnam.  
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141 Specifically, we hope to identify the causes and effects of policy process failures, and explore their  
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143 implications for integrated policy design and implementation. Our second objective is to investigate  
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145 the relationship between policy process failure, policy integration, and policy learning across  
146  
147 temporal and spatial scales of REDD governance in Vietnam. By addressing these objectives, we  
148  
149 hope to contribute to current debates about the scope and scale of REDD+ governance, and  
150  
151 strategies for promoting REDD+ policy integration (Turnhout et al., 2017). In the following  
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153 sections, we discuss our theoretical framework for our analysis, and provide an overview of our  
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155 embedded case study and methods. In our results, we address our first objective by exploring the  
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157 dynamics of REDD+ policy process failures and policy change over time. We address our second  
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159 objective in our discussion.  
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## 165 **2. Theoretical framework: Policy integration, policy failure, and policy learning**

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167 Policies are usefully conceived as multilevel and nested arrangements of goals and policy  
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169 tools “the identifiable means through which collective action is structured to address a policy  
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171 problem” (Howlett, 2009; Salamon, 2002, 19). Substantive policy tools, such as rules, financial  
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173 instruments, and organizational action, achieve policy goals by directly influencing the provision of  
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184 goods and services in public sphere. Procedural tools, such as steering committees and  
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186 collaboration, shape policy processes (Howlett, 2009). Policy design is the iterative process through  
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188 which policy tools are matched to policy goals at different levels of governance. The complexity of  
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190 policy design and implementation processes increase with the scope and complexity of a problem,  
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192 the heterogeneity and distribution of policy targets, and the number of goals, sectors, and levels of  
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194 governance in a policy domain (Howlett and Del Rio, 2015; Sabatier, 1986).  
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197         In multi goal, multilevel policy domains associated with complex cross-boundary  
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199 environmental problems, policy integration is essential, but difficult to achieve (Howlett and Del  
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201 Rio, 2015; Vince 2015). In the public policy literature, policy integration occurs when policy goals  
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203 and tools are coherent and consistent at a single level of governance (horizontal integration) and  
204  
205 across levels of governance (vertical integration) (Howlett and Del Rio, 2015). Coherent goals are  
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207 logically related and can be achieved simultaneously without any significant tradeoffs. Consistent  
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209 policy tools work in a complementary fashion to achieve a policy goal. New policy goals and  
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211 policy tools must also be internally coherent and consistent (i.e. consistent and coherent with each  
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213 other) and externally coherent and consistent (or “aligned”) with existing policy goals and policy  
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215 tools. When new policies are merely “layered” onto existing ones without effective integration, the  
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217 result is often confusion and contradictory responses from policy targets, and limited commitment  
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219 among implementing officials—issues that increase the chances of policy failure (Howlett and  
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221 Rayner, 2007).  
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224         Policy failure occurs when a policy “does not achieve the goals that proponents set out to  
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226 achieve, and opposition is great and/or support is virtually non-existent” (McConnell 2010, 326).  
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228 However, policy failure and success is often socially constructed and ambiguous; the strength of  
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230 policy failure frameworks is their utility for identifying procedural and programmatic failures, their  
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232 causes, and their outcomes, at different steps in the policy process (Howlett, 2012). Process failures,  
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244 for instance, may at occur at any stage in the policy process (Table 1) (Howlett, 2012).  
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246 Overambitious agendas are one common process failure that occurs during the agenda setting  
247 phase; they result in a plethora of goals that cannot be feasibly attained. The failure to analyze the  
248 causes of problems, coordinate with relevant institutional actors and stakeholders, and develop and  
249 evaluate different policy alternatives is a common process failure associated with policy design.  
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251 Indeed, process failures for integrated policy design are often a result of insufficient technical  
252 capacity for policy analysis, and insufficient managerial capacity for coordination and collaboration  
253 with other institutional actors (Howlett and Del Rio, 2015). Even if effectively designed, however,  
254 rushed or delayed decision-making processes can also lead to policy failure (Howlett, 2012).  
255

256 Process failures associated with agenda setting, policy design, and decision-making often lead to  
257 programmatic failures, which are evident during implementation. Programmatic failures occur  
258 when policy tools are mismatched with policy goals because of inadequate information. They are  
259 largely technical and avoidable, and are evident when policies fail to realize their goals. However,  
260 policy failure during implementation may also be procedural. Even if policy tools are well matched  
261 to policy goals, a failure to address institutional issues such as oversight, capacity or coordination  
262 challenge may nonetheless lead to policy failure (Sabatier, 1986; Howlett, 2012). Indeed, the  
263 different interests of diverse institutional actors and the transaction costs associated with  
264 collaboration often complicate effective implementation in complex institutional settings (Goggin et  
265 al., 1990; Matland, 1995). While these distinctions are useful for clarification, it is important to  
266 recognize that failures and successes exist on a spectrum, and different types of policy failure or  
267 success may exist at the same time (McConnell 2010). Indeed, there are temporal and spatial  
268 elements of policy success and failure. Politicians may receive short term electoral advantages for  
269 simply ensuring a policy completes the policy cycle, even if the policy tools reveal themselves to be  
270 ineffective and inefficient over time. Similarly, policy failures and successes often vary in terms of  
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304 their extent and distribution. Policy success, for instance, may be complicated by the uneven  
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306 distribution of analytical capacity needed to effectively “calibrate” policy instruments and settings  
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308 at lower levels of governance (Howlett, 2009; Howlett, 2012).  
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310 While policy failures may be problematic, they also provide opportunities for policy  
311  
312 learning and policy change. Programmatic and procedural challenges evident during  
313  
314 implementation may lead to *instrumental learning* about the effectiveness and efficiency of specific  
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316 tools (Table 2). This is often evident in changes to existing policy tools, or the addition of new ones  
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318 (May, 1992). Challenges for intersectoral coordination, for instance, may be addressed through the  
319  
320 creation of procedural tools such as steering committees and collaborative processes (Howlett,  
321  
322 2012). However, where problems with policy tools and mixes are more fundamental, such as when  
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324 implementation preferences and policy tools (i.e. market based versus regulatory tools) are  
325  
326 fundamentally mismatched with goals and problems, *social policy learning* is often essential. Social  
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328 policy learning involves the development of new social constructions and causal beliefs about  
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330 policy problems and solutions. It is often indicated by high level changes in problem frames, the  
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332 scope of a policy, or policy goals and targets (May 1992).  
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### 338 **3. Methods**

#### 339 **3.1 Case Study Context: REDD+ in Vietnam**

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342 During the period 1943-1993, Vietnam’s forest cover declined from 43% to 28% of its total  
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344 area. Since that time, however, forest cover has rebounded significantly due to state policies for  
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346 reforestation and forest protection (Meyfroidt and Lambin, 2008). However, deforestation,  
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348 degradation and agricultural expansion remain significant problems, and efforts to address them are  
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350 complicated by institutional fragmentation, political incentives for development, and limited  
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364 enforcement (Pham et al., 2012; Hoang et al. 2017). At national levels of governance, the Ministry  
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366 of Agriculture and Rural Development (MARD) is responsible for forest management and  
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368 protection planning and enforcement, while the Ministry of Environment and Natural Resources  
369  
370 (MONRE) is responsible for biodiversity, climate change, and land use planning. Responsibility for  
371  
372 socioeconomic development planning and budgetary allocation lies with the Ministry of Planning  
373  
374 and Investment (MPI) (Pham et al., 2012). Effective coordination between all three of these  
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376 agencies at national and subnational levels is complicated by administrative barriers, overlapping  
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378 and ill-defined responsibilities, confusing regulatory frameworks, and contradictory goals. MPI  
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380 goals for socioeconomic development are often in conflict with MARD goals and strategies for  
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382 effective forest protection and development, for instance, which complicates effective budgetary  
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384 allocation and coordination at national levels (Pham et al., 2012).  
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387 Institutional fragmentation is also an issue at subnational levels of governance. In each of  
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389 Vietnam's 58 provinces, relevant Departments of MARD, MONRE, and MPI are supervised by  
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391 Provincial People's Committees, District Committees, and Commune Committees. At local levels,  
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393 State Forest Enterprises (SFEs), such as State Forest Management Boards (state forest protection  
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395 organizations) and State Forest Companies (state forest production companies) are often the  
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397 primary legal entities with responsibility for forest management at lower levels of governance.  
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399 Nation-wide, they retain ownership of approximately 9 million hectares of forests, while  
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401 households and communities retain ownership of approximately 4 million hectares (Pham et al.,  
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403 2012). Central challenges for effective environmental governance at provincial levels are  
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405 enforcement of national laws for conservation and forest protection, integrated land use planning,  
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407 transparent and participatory decision-making, and tenure insecurity (Pham et al., 2012; Hoang et  
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409 al., 2017). Provincial officials and state forest companies often prioritize elite interests for economic  
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411 development over conservation and sustainable forest management, and there is limited  
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424 accountability to national authorities (Pham et al., 2012; World Bank, 2010).  
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426           In recent years the Vietnamese government has promulgated several new laws that promote  
427 forest conservation and protection, integrated planning, “green growth”, and sustainable forest  
428 management (Pham et al., 2012; Pham et al., 2017). The Vietnamese state has also piloted and is in  
429 the process of scaling up a national Payment for Ecosystem Services program administered by  
430 MARD and SFEs. Taxes on hydropower producers are used to fund the program, and benefits are  
431 distributed by SFE’s through contracts for forest management, monitoring, and protection  
432 (McElwee, 2012; Traedel et al., 2016). In 2009, Vietnam became one of the first countries to  
433 formally participate in REDD+. REDD+ governance is steered by the UN-REDD and the World  
434 Bank’s Forest Carbon Partnership Facility at national and sub-national levels in collaboration with  
435 the Vietnamese government and other international organizations (Republic of Vietnam, 2011). The  
436 UN-REDD’s program involves three phases, Readiness (Phase 1), Implementation (Phase 2), and  
437 Payments for verified performance (Republic of Vietnam, 2011). The World Bank operates  
438 differently, with two phases: a readiness phase, which is funded through the Readiness Fund, and a  
439 performance-based phase, funded through the World Bank’s Carbon Fund (FCPF Annual Report,  
440 2015).  
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### 460 *3.2 Data collection and analysis* 461

462           This research uses a qualitative embedded case study approach to explore REDD+ policy  
463 process failures and policy learning in Vietnam at national and subnational levels of REDD+  
464 governance. Embedded case studies are useful for investigating real life phenomenon where there is  
465 more than one level of analysis (Yin, 2013). Our data collection involved two different methods.  
466 First, we reviewed UNFCCC, state policies, programme evaluations, and national policy documents  
467 associated with the FCPF and UN-REDD REDD+ programs to investigate national policy processes  
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484 and design choices, examples of policy successes and failures, and policy learning over time.

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486 Documents such as project reports, evaluations, Provincial REDD Action Plans, and FCPF  
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488 Emission Reduction Project proposals were also analyzed to evaluate and compare REDD+ policy  
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490 design and implementation processes associated with UN-REDD and FCPF REDD projects at  
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492 subnational levels.  
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495 Secondly, we conducted dozens of in-person semi-structured interviews at national and sub-  
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497 national levels of REDD+ governance in Vietnam in July of 2015 and January of 2016. To improve  
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499 our understanding of national level REDD+ implementation dynamics, we conducted interviews in  
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501 Hanoi with representatives from Vietnamese government agencies, UN-REDD, FCPF and  
502  
503 international NGOs involved in REDD policy processes (Appendix A). We asked these individuals  
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505 about their perceptions REDD+ policy design and implementation challenges and successes,  
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507 examples of policy change, and innovative policy tools. To investigate implementation dynamics  
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509 and challenges at provincial levels, we also visited several REDD+ implementation sites and  
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511 conducted interviews with government officials and villagers in the provinces of Lam Dong and the  
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513 province of Lao Cai (Appendix B). Interviews focused on the awareness of REDD+, costs and  
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515 benefits of REDD+ implementation, and examples of REDD+ outputs and outcomes. Policy  
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517 documents and notes from interviews were transcribed and analyzed using iterative content  
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519 analysis. To investigate policy process failures and successes, and their relationship to policy  
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521 learning over time at national and subnational levels of governance, we used a process tracing  
522  
523 approach to make inferences about causal relationships between causes and effects (Collier, 2011).  
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525 In the following section, we discuss our results, highlighting process and programmatic failures and  
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527 and successes at national and sub-national levels of REDD+ governance.  
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#### 532 533 **4. Results** 534 535 536 537 538 539 540

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544 *4.1 REDD+: National policy processes*  
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546 In the early phases of REDD+ Phase I, the UN-REDD program developed several goals for  
547 making Vietnam “REDD+ ready”: develop national and sub-national institutional capacity for  
548 coordination and management of REDD related activities; build capacity for REDD+ and payments  
549 for ecosystem services at local levels; and build knowledge of approaches for reducing regional  
550 displacement of emissions (UN-REDD, 2013a). The UN-REDD program utilized several  
551 procedural policy tools to meet these goals. Several committees and working groups were created to  
552 build capacity in partnership with the Government of Vietnam. These included the policy level  
553 National REDD+ Steering Committee (NRSC) chaired by the director of MARD, and the Vietnam  
554 REDD+ office (VRO) and REDD network, which would coordinate REDD+ funding and activities  
555 among diverse non-governmental and governmental co-implementing partners. Several  
556 interorganizational REDD technical working groups were also created to develop policies and  
557 policy tools for Monitoring Reporting and Verification, governance, benefit sharing, safeguards,  
558 and reference emissions levels. Provincial REDD working groups were also formed to develop  
559 REDD+ implementation strategies in six pilot provinces (Republic of Vietnam, 2011).  
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576 There were several critical process failures that occurred during UN-REDD’s Phase I. One  
577 was a delay in the operationalization of the FCPF’s REDD readiness program. It was assumed  
578 FCPF would conduct the comprehensive analysis of existing policies, and emissions drivers, yet  
579 FCPF’s program was not funded until 2014. As a result, there was no timely analysis of the drivers  
580 of deforestation, existing policies and measures, or tradeoffs with potential policy tools and policy  
581 alternatives (Stewart and Swan, 2013). In addition to technical analysis, there were also managerial  
582 capacity limitations. Rather than engage government officials from other relevant sectors, such as  
583 the MONRE, or the MPI, UN-REDD worked almost exclusively with the MARD’s forest  
584 management agency, VNFOREST. There was also limited collaboration and engagement with  
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604 stakeholders in the private sector, and actors involved with the development of Vietnam's National  
605 PES strategy (Pham et al., 2014). Coordination with government officials was also complicated by  
606 limited capacity within VNFOREST, and transaction costs and administrative burdens associated  
607 with working with three different UN-REDD organizations (the FAO, UNDEP, and UNEP), each  
608 with their own organizational goals and culture (UN-REDD, 2012). Limited technical and  
609 managerial capacity also had interactive effects on policy design. Absent any evaluation of drivers,  
610 synergy with existing policies and measures, or cost benefit estimates of different policy  
611 alternatives, UN-REDD information and outreach with the Vietnamese government focused mainly  
612 on building awareness of REDD+ goals, rather than communicating benefits or tradeoffs associated  
613 with potential policies or strategies (Stewart and Swan, 2013). Interviewees suggested this created  
614 commitment challenges for effective Vietnamese government participation, as they were uncertain  
615 about how REDD+ would affect or complement their existing responsibilities. In addition, while  
616 REDD+ was marketed as a cost-effective approach to forest management, funding uncertainty  
617 meant that there was little assurance it would represent viable means of revenue or support for state  
618 policy goals. These procedural challenges were also aggravated by unrealistic timeframes and  
619 political pressure to develop and make a formal decision on a National REDD action plan in time  
620 for COP21 (UN-REDD, 2012; Stewart and Swan, 2013).

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641 Process failures during Phase I are evident in the Vietnamese government's 2012 National  
642 Reduction Action Plan (NRAP), the state policy intended to structure and guide REDD+  
643 implementation at national and provincial levels (Republic of Vietnam, 2012). Lack of analysis of  
644 drivers resulted in an overambitious agenda. Rather than focusing on the most feasible and  
645 actionable REDD+ strategies, the 2012 NRAP contained goals and objectives associated with all  
646 five (deforestation, degradation, conservation of carbon stocks, enhancement of carbon stocks,  
647 sustainable forest management). NRAP goals were also focused on the forestry sector, with few  
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664 concrete guidelines for interagency coordination, outside of a vague directive for intergovernmental  
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666 coordination (Republic of Vietnam, 2012). There were also few specific linkages and to existing  
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668 state policies and initiatives, such as policies for state forest protection, state PFES programs, the  
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670 2012-2020 National Action Plan on Climate Change, and the National Green Growth Strategy  
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672 (McNally et al., 2016). Limited policy analysis also meant the 2012 NRAP was essentially a broad  
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674 statement of goals linked to procedural rather than substantive policy tools (Republic of Vietnam,  
675  
676 2012).  
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679 After the development of the 2012 action plan, UN-REDD developed an ambitious set of  
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681 goals for its phase II programme: 1) Capacities for an operational NRAP are in place; 2) Six pilot  
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683 provinces are enabled to plan and implement REDD+ actions 3) MRV systems and information  
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685 safeguards are operational 4) Stakeholders at different levels are able to receive positive incentives  
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687 5) Mechanisms to address the social and environmental safeguards under the Cancun agreement are  
688  
689 in place 6) Regional cooperation enhances progress on REDD+ implementation in the Lower  
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691 Mekong Sub-Region (UN-REDD, 2013a). Once it's Readiness Proposal Package (R-PP) was  
692  
693 approved, the FCPF also identified several goals: analyze emissions drivers, existing policies and  
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695 measures, and opportunities for reform in SFEs (FCPF, 2014).  
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699 During this time, however, procedural challenges for internal and external policy integration  
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701 remained. Internal to the REDD+ program, there were coordination and communication challenges  
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703 among the different technical working groups responsible for the development of REDD policy  
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705 tools at national levels, and between the technical steering groups and organizations responsible for  
706  
707 implementing provincial pilots (McNally et al., 2016; UN-REDD, 2015c). Effective communication  
708  
709 and coordination was also complicated by governmental decision-making delays, confusion  
710  
711 associated with the goals and vague objectives in the NRAP, and limited commitment among  
712  
713 government officials (personal communication, Hanoi; UN-REDD, 2015c).  
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724 Despite these challenges, there were also some notable successes. National MRV systems  
725  
726 are anticipated to be operational in the near future, and reference emissions levels were sent to the  
727  
728 UNFCCC for approval in 2016 (UN-REDD 2017a). UN-REDD staff also had some measure of  
729  
730 success promoting cross-sectoral communication and coordination across different government  
731  
732 agencies, such as MARD, MONRE, and MPI (UN-REDD 2017a). Improved policy integration is  
733  
734 also evident in the revised 2017 NRAP. It is composed of goals and objectives that better reflect  
735  
736 emissions drivers, there are linkages to existing policies and measures, and mandates for  
737  
738 coordination across sectors and government ministries. However, while it is more focused, the new  
739  
740 NRAP is still highly ambitious in terms of its scope and scale (Republic of Vietnam, 2017).  
741  
742 Furthermore, questions remain as to whether national interagency coordination will continue after  
743  
744 UN-REDD's Phase II program has ended (UN-REDD, 2017a).  
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#### 750 *4.2 REDD+ subnational policy processes*

751  
752 Subnational REDD+ policy design and implementation approaches have also been a central feature  
753  
754 of REDD+ implementation in Vietnam. However, there are significant differences in subnational  
755  
756 strategies pursued by the FCPF and UN-REDD. In this section, we examine process challenges and  
757  
758 successes associated with each.  
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##### 762 *4.2.1 UN-REDD Sub-national policy processes*

763  
764 Provincial and local REDD+ implementation pilots were a central focus of UN-REDD since 2010.  
765  
766 Free Prior and Informed Consent consultations, benefit distribution, and participatory carbon  
767  
768 monitoring strategies were all piloted in Lam Dong province in the years 2010-2014 (UN-REDD).  
769  
770 Lam Dong was selected for these pilots because of opportunities for integration with the existing  
771  
772 payment for ecosystem services program run by the Vietnamese Forest Development Fund (VNFF),  
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784 and the presence of a relatively progressive provincial government (Stewart and Swan, 2013; UN-  
785 REDD 2013a). After the development of the NRAP, UN-REDD subsequently initiated 5 additional  
786  
787 provincial pilots in diverse and spatially distributed provinces across Vietnam, as well as a regional  
788  
789 REDD+ strategy in the Lower Mekong delta.  
790

791  
792 There were a few key process failures associated with UN-REDD’s provincial pilots and  
793  
794 subnational implementation approaches. One was a failure to effectively evaluate implementation  
795  
796 costs and benefits, and existing legal and policy issues such as tenure insecurity and uncertainty.  
797  
798 Despite early analyses that highlighted the critical importance of addressing legal and policy issues  
799  
800 up front (Xuan, 2011), UN-REDD pushed ahead with Free and Prior Informed Consent, benefit  
801  
802 distribution, and participatory monitoring pilots in Lam Dong to highlight examples of success on  
803  
804 the international stage (Stewart and Swan, 2013). Another process challenge was an overambitious  
805  
806 agenda for Phase II. Implementing a regionally coordinated strategy and six different provincial  
807  
808 level pilots appears to have taxed scarce UN-REDD resources. Little progress was made on  
809  
810 objectives associated with the regional lower Mekong delta REDD+ project, though goals  
811  
812 associated with that project were retained over the course of Phase II (UN-REDD 2015c; UN-  
813  
814 REDD 2017a). There were also some examples of policy success; each of the six UN-REDD pilot  
815  
816 provinces developed PRAPs by 2016. However, provincial UN-REDD PRAPs are highly  
817  
818 ambitious. They are composed of numerous goals and objectives for site specific and provincial  
819  
820 level activities, from tenure assessment and forest allocation, to small scale reforestation and benefit  
821  
822 distribution projects. Effective PRAP development was also complicated by the lack of direction  
823  
824 and guidance associated with the NRAP, the national policy to which they were tiered (UN-REDD,  
825  
826 2017b). These challenges resulted in limited horizontal and vertical coherence. Limited funding and  
827  
828 capacity limitations have made it infeasible to address all but a few PRAP priority activities—  
829  
830 activities which UN-REDD staff acknowledge will make little substantive difference in carbon  
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844 emissions (UN-REDD, 2017a). While there is some funding commitment from the Vietnamese  
845  
846 government for a few proposed activities in each UN-REDD PRAP, it is dwarfed by the cost of  
847  
848 proposed priority activities (Vietnam REDD+ Office, 2017). Optimistic assumptions for funding  
849  
850 have not been realized, and as a result, many of the goals associated with UN-REDD's PRAP  
851  
852 appear to be aspirational rather than actionable.  
853  
854

855 Implementation challenges were also evident in site visits to Lam Dong and Lao Cai  
856  
857 provinces. In Lam Dong province (Da Nhim commune, Da Chay village), local government  
858  
859 officials noted that the commune received a non- specified amount of funding, of which 70% was  
860  
861 designed for a micro-loan package intended to incentivize participatory forest carbon monitoring—  
862  
863 a implementation strategy that has since been abandoned (Traedel et al., 2017). A tree planting  
864  
865 project was the only visible sign of the UN-REDD+ project in the district. There was also evidence  
866  
867 of limited consistency in policy tools. Many villagers were confused about the UN-REDD project,  
868  
869 as it coincided with a bilateral Japanese REDD+ project which provided a loan (20 million dong) to  
870  
871 selected households for forest monitoring. In Lam Ha district (Phu Son commune, R'teng 2 village)  
872  
873 both REDD and state PES strategies are being implemented simultaneously. The government's PES  
874  
875 scheme provides 450,000 dong per household/per year to monitor the forest, whereas REDD  
876  
877 utilizes a micro-loan approach; villagers are given loans for economic development that must be  
878  
879 paid back. The state forest management boards handle PES implementation, and at the time our  
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881 visit, no REDD+ monitoring was carried out. Interviews with district officials also highlighted a  
882  
883 lack of awareness and understanding of REDD+.  
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887 Out of 11 villages in Di Linh commune, one village, Kalatangu, was selected in 2014 for  
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889 Phase II implementation—a village that was also the site of early FPIC pilots in 2009. However,  
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891 like other researchers, our findings suggest that these outreach and engagement activities were  
892  
893 counterproductive and inefficient, as they generated unrealistic expectations for financial  
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901 compensation, and several years lapsed between outreach and implementation (see Pham et al.  
902 2015). REDD activities in the village now involve a loan of 10 million dong per year, with  
903 repayments integrated into a revolving fund. Site visits in Lao Cai province also highlighted slow  
904 progress. Villagers and provincial and commune authorities indicated they were aware of REDD+,  
905 but micro-loans were not yet available. Some respondents indicated that illegal logging may be on  
906 the decline because of REDD+ interventions, but we were unable to confirm this during our field  
907 work. In summary, there was little evidence of the effectiveness and feasibility of REDD+  
908 interventions, and there are clear challenges for “scaling up” UN-REDD interventions in other  
909 provinces, such as Lao Cai.  
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#### 925 *4.2.2 FCPF subnational policy processes*

926 The FCPF took a different approach to sub-national REDD+ design and implementation.  
927 Once a readiness package had been approved, MARD (with support from the FCPF) submitted an  
928 Emissions Reduction Package proposal (ER-P) for a regional REDD+ strategy in six provinces in  
929 the North Central Coast agro-ecological region in 2014—an area characterized by high levels of  
930 biodiversity, poverty, deforestation and agricultural expansion (FCPF, 2014). From the years 2014-  
931 2017, the FCPF implemented two pilots at provincial levels, and collaborated with JICA, an  
932 organization also implementing REDD+ projects in the region. The FCPF also conducted extensive  
933 consultation and outreach with provincial officials and members of local communities, developed  
934 PRAPs for each province in the region, reviewed existing policies and measures, and worked on a  
935 regional scale MMV system and emissions reference level (FCPF 2016). There were a few process  
936 challenges associated with the development of the ER-P, the most critical being limited capacity for  
937 effective outreach and coordination with community members and provincial authorities in different  
938 government sectors (FCPF 2015).  
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Despite these challenges, there is also evidence of policy process success. The most recent ER-P was given a positive evaluation by an independent review board, and policy goals and policy tools appear to be internally complementary and consistent vertically and horizontally across levels of governance (FCPF 2017a; FCPF 2017b). There are four central components of the ER program that are tightly linked to emissions drivers: strengthening enabling conditions for emissions reductions through integrated planning, land use allocation, and law enforcement; promoting sustainable management of forest and carbon stock enhancement through conservation and SFM; promotion of climate smart agriculture and sustainable livelihoods for forest dependent people through financial and technical assistance; and program emissions and monitoring. At provincial levels, coordination among diverse government officials and funding for institutional capacity building will support the interagency coordination and capacity building, and the development of supporting policies and measures. At lower levels of governance, state forest enterprises are the primary agents and legal entities responsible for forest monitoring and benefit distribution. In this respect, the ER-P's benefit distribution strategy is similar to the state's PFES program to which it will be linked, though there are some important distinctions. One is an emphasis on participatory decision-making and co-management. Benefit distribution will be implemented by Forest Management Councils (FMC) using an "adaptive collaborative management approach" (ACMA) (FCPF, 2017a). FMC's are participatory decision-making structures composed of commune officials, SFE staff, representatives from local villages, and provincial REDD+ coordinators (who have veto power on financial allocation decisions). While some funding is earmarked for the resolution of tenure issues and livelihood assistance for poor households, benefit distribution will not involve direct payments to households for carbon retention or conservation. Specific targets for funding and REDD+ interventions at local levels will be identified through environmental and socioeconomic needs assessments and FMC participatory decision-making processes (FCPF

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1024 2017a). Accountability will be ensured through positive incentives (results based funding), and  
1025  
1026 monitoring and evaluation by an independent review board, including randomized audits of SFEs.  
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1028 Results from ACMA pilots indicate that these governance structures can be used to negotiate and  
1029  
1030 formalize tenure for communities and households, and improve local participation in decision-  
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1032 making and REDD+ implementation (FCPF 2017a). Local forest monitoring and evaluation will be  
1033  
1034 implemented through an innovative electronic tablet based approach developed by JICA which  
1035  
1036 allows SFE officials and local communities to efficiently monitor forest change, and link local  
1037  
1038 information to regional and national MMV systems (FCPF, 2017a).  
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1041 ER program goals and policy tools are also integrated with national policies and  
1042  
1043 government priorities, such as the 2016-2020 National Sustainable Forest Management Action Plan  
1044  
1045 and SFM certification initiative, VNFF's PFES strategy, and new forest and planning laws that  
1046  
1047 emphasize integrated land use planning, environmental conservation, and centralized oversight for  
1048  
1049 land allocation decisions (FCPF, 2017a). Policy alignment has also benefited from political support  
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1051 from the state government. Shortly after taking office in 2016, Prime Minister Nguyen Xuan Phuc  
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1053 stated his strong commitment to stopping the conversion of natural forest for agricultural purposes  
1054  
1055 in a speech in the north central highlands, and subsequently issued Directive 13 (and Resolution 71  
1056  
1057 and associated annexes)—a policy that outlines roles and responsibilities for forest protection and  
1058  
1059 enforcement at provincial levels (FCPF, 2017a). Political support and policy integration is also  
1060  
1061 evident in a tentative state commitment of approximately \$52 million dollars for ER program  
1062  
1063 implementation. Indeed, the central benefit of effective policy integration in the ER-P is integrated  
1064  
1065 funding streams. Only 16% percent of program funds are anticipated to come from results based  
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1067 payments from the Carbon Fund; the rest will come from state revenue and financial institutions,  
1068  
1069 World Bank development projects, bilateral aid programs, state PFES programs, and revenue from  
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1071 SFE's that can be reinvested over time (FCPF, 2017a). However, while the ER-P reflects effective  
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1084 policy design, decision-making delays and institutional variables may yet complicate  
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1086 implementation. Legal frameworks for a REDD+ fund still need to be formalized, tenure issues will  
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1088 need to be resolved (though this is a priority under the ER-P), and centralized oversight and  
1089  
1090 enforcement will be essential (FCPF, 2017a).  
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## 1093 1094 1095 **5. Discussion** 1096

1097         Our findings highlight important temporal and spatial interactions with REDD+ policy  
1098  
1099 process failures and policy learning in Vietnam. At national and sub-national levels, the UN-REDD  
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1101 program was complicated by every type of process failure during Phase I and Phase II (Table 3).  
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1103 These process challenges had profound implications for the trajectory of the UN-REDD programme  
1104  
1105 at both National and provincial levels. Due to limited technical and managerial capacity and  
1106  
1107 politically driven timelines, the 2012 NRAP lacked integration with existing policies and cross-  
1108  
1109 sectoral initiatives, which complicated subsequent policy development at national levels. Limited  
1110  
1111 analysis and capacity meant that UN-REDD Phase II’s program was essentially a collection of  
1112  
1113 goals and procedural policy tools, rather than substantive policy tools. Goals for coordination and  
1114  
1115 “capacity building”, appear to have been an end in themselves (UN-REDD, 2015). Absent any  
1116  
1117 identification of policy alternatives, national capacity building efforts designed to build  
1118  
1119 commitment were largely ineffective due to the uncertainty associated with the costs and benefits of  
1120  
1121 different policy alternatives, and future funding streams.  
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1124         At subnational scales, FPIC, participatory carbon monitoring, and benefit distribution pilots  
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1126 were also complicated by short time frames, and limited technical and managerial capacity for  
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1128 policy analysis and evaluation. In Lam Dong, for instance, UN-REDD benefit distribution  
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1130 approaches were merely “layered” on top of the state’s existing PFES program, and FPIC and  
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1132 participatory monitoring strategies were limited in their effectiveness and efficiency. These  
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1144 challenges were largely avoidable; a recent analysis by JICA demonstrates that a basic cost-benefit  
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1146 analyses would have likely highlighted the infeasibility of the UN-REDD's approach (JICA, 2017).  
1147  
1148 There are also cross-level interactions associated with policy process failures. The 2012 NRAP, for  
1149  
1150 instance, complicated the development of PRAP's at subnational levels, with implications for site  
1151  
1152 level interventions. However, early pilots and the 2012 NRAP were important political successes at  
1153  
1154 international levels. The UN-REDD needed to demonstrate progress and success in time for COP  
1155  
1156 21, and local pilots and the NRAP were highlighted as important examples of REDD+ progress (see  
1157  
1158 UN-REDD, 2014).  
1159

1160  
1161           Programmatic and process failures have also led to instrumental policy learning. Despite  
1162  
1163 capacity limitations and limited coherence, UN-REDD PRAP development processes have  
1164  
1165 generated important lessons about effective planning, assessment, and forest land allocation  
1166  
1167 processes that may be transferrable across scales (UN-REDD 2017b; UN-REDD 2017c). Lessons  
1168  
1169 learned from FPIC, participatory monitoring, and benefit distribution pilots are also evident in the  
1170  
1171 recent ER-P for the North-Central coast. The ER-P, for instance, stresses the importance of  
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1173 communication and outreach strategies that emphasize non-financial benefits and do not generate  
1174  
1175 unrealistic expectations. Benefit distribution systems also focus on co-benefits, such as technical  
1176  
1177 and livelihood assistance for climate change adaptation and sustainable forest management, rather  
1178  
1179 than results based payments for carbon (see McElwee 2017). Complex participatory forest carbon  
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1181 monitoring strategies have also been abandoned in favor of innovative forest monitoring approaches  
1182  
1183 that track basic changes in forest cover (FCPF 2017).  
1184  
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1187           REDD+ policy process challenges and failures also appear to have led to social policy  
1188  
1189 learning (Table 4). This is evident in the UN-REDD's reframing of REDD+ as a transformative  
1190  
1191 agenda for forest governance, rather than a results-based financial performance mechanism (UN-  
1192  
1193 REDD, 2015c). However, while this learning has occurred within UN-REDD, there indications that  
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1204 it has not extended to many Vietnamese officials, who still see REDD+ primarily as a financial  
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1206 incentive mechanism (UN-REDD, 2017a). Social policy learning is also evident in the scope and  
1207  
1208 scale of MARD and the FCPF’s REDD+ strategy. UN-REDD’s decision to develop pilots in six  
1209  
1210 diverse and spatially distributed provinces may have been instrumental in this regard. While such an  
1211  
1212 approach is useful for exploring the *range* of interventions that could be used to achieve REDD+  
1213  
1214 goals at national scales, it created coherence and consistency challenges at provincial scales and  
1215  
1216 across provinces, and limited opportunities for “scaling up” and integrating specific interventions  
1217  
1218 with national policies and tools, such as MRV systems. In contrast, the FCPF’s regional approach  
1219  
1220 allowed it to exploit economies of scale for analysis, due to regionally consistent emissions drivers,  
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1222 ecological conditions, and tenure arrangements. It also promoted the development of regionally  
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1224 coherent and consistent policy goals and policy tools across the six ER-P provinces.  
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1228 Social policy learning is also evident in the policy targets and policy goals associated with  
1229  
1230 the FCPF’s ER-P. Rather than a narrow focus on “results based” financial mechanisms that target  
1231  
1232 individual households, the proposed ER-P exploits existing state institutions; the primary target is  
1233  
1234 provincial authorities and SFEs, and the primary policy tools are regulatory and organizational.  
1235  
1236 Indeed, the ER-P is essentially a mechanism for promoting policy integration; it unifies state and  
1237  
1238 donor driven policies and priorities under a coherent and consistent policy framework—an  
1239  
1240 opportunity highlighted by REDD+ scholars (Gupta et al., 2016; Pham et al., 2016). Forest  
1241  
1242 Management Committees and adaptive collaborative management approaches also have the  
1243  
1244 potential to be transformative. By promoting effective participation and accountability for resource  
1245  
1246 allocation decisions, they may go some way towards addressing long standing institutional barriers  
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1248 for participatory decision-making and social equity at local levels of governance (cite). However,  
1249  
1250 top-down accountability mechanisms will likely be needed to ensure effective implementation (see  
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1252 Toni, 2011). Tiered governance strategies, such linked national, regional and local MRV systems,  
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1264 also promote vertical and horizontal policy integration. While regional MRV systems are essential  
1265  
1266 for results based payments from the Carbon Fund, they are also useful for ensuring accountability  
1267  
1268 for forest protection, and evaluating the effectiveness of integrated land use planning approaches—  
1269  
1270 current policy priorities of the Vietnamese government (FCPF, 2017a).  
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## 1272 1273 1274 1275 **6. Conclusion: Implications for REDD+ governance** 1276

1277 The experience of UN-REDD and the FCPF highlight several important considerations for  
1278  
1279 REDD+ going forward. First, our findings highlight the central importance of state regulatory and  
1280  
1281 organizational policy tools for REDD+ implementation, such as land use planning, forest allocation,  
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1283 and administrative capacity building (Minang et al., 2014; Atela et al., 2016). However, the use of  
1284  
1285 regulatory and organizational tools is only possible because of the presence of complementary state  
1286  
1287 policies and political commitment; it is difficult to imagine how REDD+ will be transformative in  
1288  
1289 contexts where these variables are lacking. It also remains to be seen if state commitment,  
1290  
1291 procedural tools and accountability mechanisms will be sufficient to address institutional path  
1292  
1293 dependencies, corruption, and problematic economic and political incentives for development at  
1294  
1295 provincial levels of governance in Vietnam (McElwee, 2012; Traedel et al., 2016). Further research  
1296  
1297 will be needed to evaluate challenges, opportunities, and policy learning in this context.  
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1300 Secondly, adequate technical and managerial capacity is essential for the design of  
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1302 integrated REDD+ policies because integrated policies are essential for leveraging funding and  
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1304 administrative capacity for implementation (Williams and McNutt, 2013). As the example of UN-  
1305  
1306 REDD illustrates, donor driven REDD+ initiatives characterized by limited financial, technical and  
1307  
1308 managerial capacity create challenges for effective policy integration and government commitment.  
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1310 This is evident in limited government funding for activities associated with the six UN-REDD  
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1312 PRAPs (approximately \$12 million dollars) (Vietnam REDD+ Office, 2017). In contrast, the FCPF  
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1321 worked to ensure ER-P goals were aligned with government policies and donor funding priorities.

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1324 As a result, the 8-year ER-P is supported by a commitment of over 300 million dollars from diverse  
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1327 sources, which may help to ensure the sustainability and viability of the program over time (FCPF  
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1329  
1330 2017).

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1332 Third, our findings suggest that available technical and managerial policy analytical  
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1334 capacity should be balanced with an appropriate scope and scale for REDD+ policy design.  
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1336 Significant resources are needed to develop policy goals and potential policy tools at lower levels of  
1337  
1338 governance, and resources invested at one scale reduce the availability of resources at another. The  
1339  
1340 significant investment needed to develop policy goals and tools may not be worthwhile if resources  
1341  
1342 for implementation are absent, and interventions and approaches are difficult to replicate or “scale  
1343  
1344 up”. While investment at national levels is essential for capacity building and policy alignment,  
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1346 targeted and regional approaches, rather than numerous and spatially distributed pilots, may be  
1347  
1348 more effective for promoting horizontal and vertical policy integration. This type of targeted and  
1349  
1350 regional approach also has benefits for the efficient allocation of resources. The ER-P is focused on  
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1352 an area with high rates of deforestation and biodiversity, and funding for livelihood assistance will  
1353  
1354 be targeted on “hot-spots” for deforestation and agricultural expansion within the ER-P project zone  
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1356 (FCPF, 2017a).

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1358  
1359 Finally, these considerations have normative implications for the roles and responsibilities  
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1361 of international REDD+ organizations. We suggest that in contexts where there is domestic political  
1362  
1363 commitment and opportunities for policy integration with existing policies and priorities, the best  
1364  
1365 use of scarce international resources may be in technical and managerial capacity for policy  
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1367 analysis and coordination, rather than implementation and service provision. This is not to suggest  
1368  
1369 that local interventions and pilots are always ineffective at fine scales, only that their long-term  
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1371 sustainability and *scalability* will be limited in the absence of state commitment, especially as donor  
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1384 organizations tend to quickly embrace the next “silver bullet” for conservation without learning  
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1386 from the lessons of the last one (Lund et al., 2016). Our findings suggest some aid organizations  
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1388 may already be taking this approach in Vietnam. The organization SNV has recently shifted  
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1390 investment in capacity from local to national scales, and there are indications UN-REDD is  
1391  
1392 increasingly focusing on national level policy issues such as illegal logging and regulatory  
1393  
1394 enforcement. Where there is state commitment and enabling policies, international organizations  
1395  
1396 may be able to provide much needed technical analysis for policy integration and cross-sector  
1397  
1398 coordination. This is an area where UN-REDD has had the most success in Vietnam. Investment in  
1399  
1400 managerial capacity for coordination with civil society actors may also be an important focus. As  
1401  
1402 Huynh and Keenh (2017) usefully suggest, international NGOs in Vietnam can mobilize political  
1403  
1404 support for lasting policy change through the coordination and support of civil society networks and  
1405  
1406 organizations—a strategy that may have more profound and long-lasting benefits than service  
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1408 provision pilots. Pursuing these goals, however, will also require significant policy learning and  
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1410 political commitment on the part of international and donor organizations.  
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Table 1. Policy failures

Type of failure	Definition
<i>Programme failure</i>	Failure of a policy program to reach its stated goals. Failure to gather information about specific tools and techniques.
<i>Policy process failure</i>	
Agenda setting	Establishing or agreeing to establish overburdened or unattainable policy agendas
Policy design	Attempting to deal with problems without investigating or researching problem causes and identifying the effects on policy alternatives (often leads to programmatic failure)
Decision-making	Failing to decide on a policy within a reasonable period of time or distorting its intent through bargaining and logrolling
Implementation	Failing to deal with implementation problems including lack of resources, principal–agent problems, oversight failures, and others
Evaluation	Lack of learning due to lack of or ineffective or inappropriate policy monitoring and/or feedback processes and structures

Source: Howlett (2012)

Table 2. Types of policy learning

Learning type	Definition	Indicator
Instrumental learning	New understanding about the viability of policy instruments or implementation designs based on experience and evaluation.	Changes in instruments for carrying out the policy - e.g., inducements, penalties, assistance, funding, timing of implementation, organizational structures.
Social policy learning	Lessons about the social construction of policy problems, the scope of policy, or policy goals.	Policy redefinition entailing change in policy goals or scope — e.g., policy direction, target groups, rights bestowed by the policy.

Source: May (1992)



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Table 3. REDD+ policy failures

Failures of policy process	Example	Outcome
Agenda setting	Overambitious agenda for Phase I and Phase II at national levels; Overambitious agendas for NRAP and PRAP implementation	Policy failure for UN-REDD goals for phase I; success limited to MMV, development of 2017 NRAP, and capacity building and coordination during Phase II
Policy design	Lack of evaluation of drivers, existing policies and measures, limited engagement and coordination with stakeholders at national and subnational levels	NRAP and PRAPs with limited horizontal and vertical coherence and consistency; poorly designed FPIC, monitoring, and benefit distribution pilots.
Decision-making	Failure to fund FCPF until 2014; Rushed decision on 2012 NRAP; Decision-making delays within Vietnamese Government during Phase II	Limited coherence and consistency of NRAP and PRAPs; challenges for policy integration and delays during Phase II
Implementation	Inadequate resources for REDD+ interventions at provincial scales; limited success of technical working groups aside from MMV	Limited efficiency and effectiveness of pilots at local scales; lack of substantive policy outcomes in many technical working groups at national level
Evaluation	UN-REDD Failure to change goals and objectives during phase II	Inability to focus resources on actionable goals; limited effectiveness and efficiency of PRAP activities

Table 4. Examples of REDD+ policy learning

Learning type	Indicator
Instrumental learning	Changes in benefit distribution, FPIC and communication, participatory monitoring tools; emphasis on policies, measures, and regulatory and organizational tools rather than “performance based payments”
Social policy learning	UN-REDD: reframing of REDD agenda/goals FCPF: Regional rather than national scope; State entities primary policy targets (rather than households)

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1864 Appendix A. Interviewee affiliations  
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1866 REDDEX (int org working with REDD+ flows of funds)  
1867 Center for Sustainable Development, Hanoi, NGO  
1868 CERDA (The Centre of Research and Development in Upland Areas), Hanoi, NGO  
1869 Institute of Cultural Studies, Hanoi (research organisation)  
1870 SNV, Netherlands Development Organization, Hanoi, NGO  
1871 RECOFTC, The Center for People and Forests (Thai NGO), Hanoi  
1872 GIZ (German investment cooperation), Hanoi  
1873 NORAD. Hanoi  
1874 JICA, Hanoi  
1875 MARD, Hanoi  
1876 UNREDD, Hanoi  
1877 World Bank, Hanoi  
1878 UNREDD, Lam Dong  
1879 Pan Nature, Hanoi, NGO  
1880 UNDP, Hanoi  
1881 Danish embassy, Hanoi  
1882 Vietnam Forests and Deltas Program, USAID supported program  
1883 District and Commune People’s Committees in Lam Dong  
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1887 Appendix B. Location of site visits  
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Province	District	Commune	Village
Lâm Đồng	Lâm Hà	Phú Sơn	Preiteng 2
	Di Linh	Bảo Thuận	Kala Tungu
	Lạc Dương	Đa Nhim (6 villages)	Đạ Chai
Lao Cai		Long Khanh	Thon 1
			Thon 2
	Bao Yen	Xuan Hoa	Ban Qua 1
			Ban Qua 2
			Ban Bon
			Thon Lu
	Bao Thang	Ban Cam	Nam Chu
Ban Lot			

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