

**Programme Evaluation Series**

# **Evaluation of the FAO-EU forest law enforcement, governance and trade programme – Phase III**

**GCP/GLO/600/MUL  
GCP/GLO/397/EC**

**Annex 2. Cambodia case study**

# Contents

<b>Abbreviations and acronyms</b> .....	<b>iii</b>
<b>1. Introduction</b> .....	<b>1</b>
1.1 Background and methodology.....	1
1.2 Limitations .....	2
<b>2. Background</b> .....	<b>3</b>
2.1 Context of the programme .....	3
2.2 Theory of change .....	4
<b>3. Evaluation findings</b> .....	<b>5</b>
3.1 Relevance .....	5
3.2 Outcomes.....	5
3.3 Social inclusion, equity and gender .....	7
3.4 Partnerships .....	8
3.5 Potential sustainability.....	9
3.6 Programme management .....	10
<b>4. Lessons learned</b> .....	<b>11</b>
<b>5. Observations</b> .....	<b>12</b>
<b>Bibliography</b> .....	<b>13</b>
<b>Appendix 1. People interviewed</b> .....	<b>14</b>

## Abbreviations and acronyms

EFI	European Forestry Institute
FAO	Food and Agriculture Organization of the United Nations
FLEGT	Forest Law Enforcement, Governance and Trade
RECOFTC	Regional Community Forestry Training Centre in Asia and the Pacific
TWG-FR	Technical Working Group on Forest Reform
VPA	Voluntary Partnership Agreement

# 1. Introduction

## 1.1 Background and methodology

1. This document presents the country case study on Cambodia, as part of the final evaluation of the third phase of the FAO-EU forest law enforcement, governance and trade programme, hereafter referred to as FLEGT-III, phase three of the programme. The programme is financed by the European Commission (EC), the Foreign Commonwealth and Development Office (FCDO)<sup>1</sup> of the United Kingdom of Great Britain and Northern Ireland and the Swedish International Development Cooperation Agency (SIDA). The programme is implemented by the Food and Agriculture Organization of the United Nations (FAO). The evaluation looked at the programme in its whole but has used case studies to have a closer look at six countries in particular to assess the evaluation questions at country level. Cambodia is one of these.
2. The selection of countries case studies was based on the following criteria:
  - i. importance, age and size of the FLEGT portfolio in the country;
  - ii. balance between Voluntary Partnership Agreement (VPA) and non-VPA countries;
  - iii. geographical balance across and within the regions;
  - iv. information-rich cases to illustrate both good practices and challenges we can learn from (partners/stakeholders; technical areas; gender, micro, small and medium enterprises, etc.);
  - v. availability of previous assessments for comparison (either provided by the mid-term evaluation or case studies from the Center for International Forestry Research and others);
  - vi. inclusion of countries that were not yet assessed;
  - vii. good country-level support and coordination to set up interviews; and
  - viii. probability of significant development after the mid-term evaluation.
3. Cambodia was selected on the following criteria: being a non-VPA country, its strategic position in the Mekong region and interactions with neighbouring VPA countries. Evaluating FLEGT-III in Cambodia could generate better understanding of the overall programme effectiveness in the region and offer valuable lessons.
4. The evaluation was based on the review of documentation<sup>2</sup> and key informant interviews. The report presents the findings according to the six main evaluation questions included in the evaluation matrix (Appendix 3 in the overall evaluation report). The case-study is not an evaluation of the FAO-EU FLEGT programme in Cambodia but meant to support the overall evaluation. Therefore, no conclusions or recommendations were elaborated for the country, only findings, lessons and observations. Also, Outcome 1 targeted only VPA countries and Outcome 5 targeted overall programme impact; therefore, these outcomes were not analysed in this case study.

---

<sup>1</sup> Previously (until September 2020) called Department for International Development.

<sup>2</sup> Please see the bibliography.

5. The data-collection for this case-study was carried out between August 6-26, 2021, and the interviews were conducted remotely through Zoom (individual and group interviews) with a range of stakeholders involved in FLEGT-III. These included country-level and regional-level staff in the FAO regional office, representatives from the Forest Administration, Ministry of Agriculture, Forestry and Fisheries, and civil society grantees, the European Forest Institute (EFI) and other international/agencies. A total of 12 people were interviewed. A list of persons consulted is included in Appendix 1. A summary of the representation of persons consulted can be found below:

**Figure 1. Persons consulted**

Stakeholder group	Number of persons
Government officer	1
Civil society organizations/community organization	2
International organization	2
Bilateral/multilateral agency	7
<b>Total</b>	<b>12</b>

Source: Prepared by the evaluation team.

## 1.2 Limitations

6. There were international travel restrictions related to the global COVID-19 pandemic. Therefore, in-country missions by the evaluation team were impossible and all preparations, interviews, triangulation have been done by teleconferencing means. This resulted in less opportunity for important additional communication with key stakeholders such direct interaction, informal conversations, field and facilities observation and immediate follow up.
7. Due to the COVID-19 pandemic, all interviews were carried out online via Zoom or Skype. Due to the evaluator's previous fieldwork and professional experience on forest governance in Cambodia, trust and credibility was established with the interviewees through this virtual modality of interaction without compromising the quality of data collection.
8. The scale of programme investment in Cambodia is relatively small compared to the support provided in other Southeast Asian countries. Therefore, less interviews were performed, compared to the other case-study in the region, Indonesia. To overcome this limitation, the evaluator complemented the virtual interviews with careful analysis of policies, studies, and (programme) reports.

## 2. Background

### 2.1 Context of the programme

9. FLEGT-III in Cambodia has been in place since 2017 and involves intensive consultation processes with the government of Cambodia to develop the roadmap in the country as a non-VPA country. In 2019, the programme conducted a national FLEGT multi-stakeholder workshop to identify intervention priorities and law enforcement improvements that would contribute to sustainable forest management. The Ministry of Agriculture, Fishery and Forestry approved five key areas:
  - i. develop the Cambodian timber legality definition;
  - ii. review law and regulation and take part in the ongoing process of amending the regulation which includes the role and duties of forest administration;
  - iii. implement targeted capacity building;
  - iv. select model areas for effective piloting of the trading of timber originated from community forestry and family tree plantation; and
  - v. assign an existing working group, the Technical Working Group on Forest Reform (TWG-FR), to develop a road map for FLEGT in Cambodia.
10. Based on the official record, Cambodia has over 10 million ha forests that are managed by two ministries: the Ministry of Agriculture, Forestry and Fisheries that manages around 20 percent of forest areas (community forestry and production forest) and the Ministry of Environment that manages 80 percent of forest areas (protected forests and protected areas). Illegal logging has been a long-standing issue in the country and one of the main causes of deforestation. Global Forest Watch estimated that Cambodia lost 2.17 million ha of tree cover, equivalent to a 25 percent decrease (Al Jazeera, 2019). A substantial proportion of area deforested covering 557 000 ha is located in protected areas, of which around 11.7 percent loss of the total protected areas (Kresek, 2019). Moreover, agriculture expansion that has been aided by economic land concessions for local and foreign investors in Cambodia further leads to widespread deforestation (Yasme et al., 2017).
11. The geographical location of Cambodia in the heart of the Mekong region and its importance in broader timber value chains in the region, particularly Viet Nam, makes it a strategic country in the FLEGT processes in Southeast Asia. Cambodia is one of the major suppliers of timber for the Vietnamese wood processing industries, which is estimated to consume about 2 million cubic meters annually (To and Mahanty, 2019). In 2016–2017, for instance, there was an unprecedented surge in Cambodian timber exports to Viet Nam with the country exporting around 400 000 m<sup>3</sup> into Viet Nam every year (To et al., 2018). Studies also show a significant degree of illegality in timber trade between Cambodia and Viet Nam (To et al., 2018; Milne, 2015; EIA, 2017, 2018).
12. Cambodia is among the first countries in discussion with the European Union on the possibility of joining VPA negotiations. However, after series of meetings, the negotiation fell short (Anonymous, n.d.). Later, the country agreed to take concrete measures to improve its forest governance by engaging with FLEGT III as a non-VPA country, and the FLEGT roadmap was approved by the government in 2019 after a multi-stakeholder workshop. Participating in the FLEGT process offers an opportunity for Cambodia to show

that the country can produce timber and control the flow of illegal timber into neighbouring countries (FAO, 2019). It would also enable the country to align itself with similar efforts in the Mekong region and fulfil Association of Southeast Asian Nations (ASEAN) criteria and indicators of legality of timber, hence enhancing access to better and more rewarding markets for legal timber products.

13. Since 2020, FLEGT III has been supporting two main projects in Cambodia through direct assistance that have a total project value of USD 197 387. Firstly, a project implemented by the Regional Community Forestry Training Centre in Asia and the Pacific (RECOFTC) that aims to support increased market access and livelihood potential for community forest producers through developing a timber legality definition in community forestry and improving their capacity to enter legal timber value chain. Secondly, a project implemented by the Forest Administration that aims to improve forest plantations and increased market access through developing timber legality definition in forest plantations and improving market access for legal timber.

## **2.2 Theory of change**

14. In Cambodia, no specific theory of change (TOC) has been developed. Instead, the roadmap was developed with specific focus areas (as described in paragraph 9).

### 3. Evaluation findings

#### 3.1 Relevance

*Evaluation question 1. To what extent has the programme design (and particularly, its revisions at mid-term) remained appropriate vis-à-vis its expected objectives and outcomes?*

**Finding 1.** The programme is relevant to national and local forest governance objectives to improve forest governance through setting a groundwork to establishing a legal timber traceability system and enhance inclusiveness of forest governance through multi-stakeholder processes. The programme is well aligned to the FLEGT roadmap of Cambodia.

15. All interviewees emphasized the relevance of the programme to improve good forest governance and tackle illegal logging in Cambodia. Furthermore, the programme design and objectives are deemed relevant to the needs of different stakeholders at national and local levels in Cambodia. As explained by the interviewees and a consultation report, the programme in Cambodia is demand driven and its design is based on priorities identified in close consultations with stakeholders during the national consultation meetings (EU-FAO programme, 2019). This also ensured its relevance with Cambodia's FLEGT roadmap and feasibility in the implementation phase.
16. The Government of Cambodia aims to allocate 2 million ha under the community forestry programme by 2029. In 2019, there were 636 community forestry sites under various stages of development covering an area of 516 817 hectares (FAO, 2021). Interviewees suggested that developing the legality definition and framework for tracing the timber products across the value chain is paramount to address illegal logging in the country. Currently, the legal framework only allows timber harvesting in community forests for subsistence purposes. As most of the community forest areas have the potential for commercial timber harvesting in the future, the legality framework will serve as a guide for harvesting timber legally in the community areas.
17. Similarly, defining the legality framework for the production forest is crucial. The government strives to improve its productive forest industries to support the country's economic growth, and the legality framework is expected to improve the country's access to the timber market (Global Forest Service, Forestry Administration and EU FLEGT Facility, 2014).
18. Interviewed stakeholders indicated that with the limited public space currently available for public participation in policy discussion in Cambodia, the multi-stakeholder processes through the TWG-FR revived by the programme in 2019, that are highly relevant to broaden the space for civil societies' engagement in policy discussions and enhance transparent and inclusive forest governance. This will be further discussed in section 3.2 (outcomes) and 3.4 (partnerships).
19. Since the projects in Cambodia have only begun implementation in 2020, after the midterm evaluation in 2018, the programme implementation has been adjusted following key findings from other countries. For example, the programme decided to cut the layered selection process by soliciting concept notes to organizations directly that suit with key focus areas described in the roadmap. An interviewee is of the opinion that this approach has made the administrative process more efficient.

#### 3.2 Outcomes

*Evaluation question 2: To what degree has the programme achieved its set outcomes?*



**Finding 2.** It is too early to see the expected achievements as the project activities are still on-going and some activities have been delayed due to the COVID-19 pandemic and prolonged approval processes. Achievements at the output level are the finalization of a legality definition in community forest and production forests areas and the revitalization of multi-stakeholder processes in forest governance.

20. To date, there is little evidence of achievement of the goals of the Cambodia FLEGT roadmap, particularly regarding the following two goals: i) the implementation of elements of good forest governance; and ii) timber legality in non-VPA countries and improved knowledge about benefit, best practices, and requirements of legal timber and trade. This is understandable since most project activities only began last year. Moreover, the project progress report (RECOFTC, 2021) and interviewees indicated that implementation has been hampered by the pandemic and rather prolonged approval processes from the government and the steering committee.
21. At this stage, the evaluation took note of the following outputs:
  - i. As described in the RECOFTC progress report (RECOFTC, 2021), the draft of a legal and technical procedure for harvesting timber legally in community forest areas has been completed, and two consultation meetings at the national level had been held. However, the field testing of these procedures and the capacity building activities involving local communities have been delayed due to mobility restrictions to curb COVID-19 pandemic.
  - ii. Based on the progress report submitted by the Forest Administration (Ministry of Agriculture, Forestry and Fisheries, 2021), the draft of legal and technical procedures for legal timber harvesting in forest plantation and the training materials are still being developed by the consultants.
  - iii. The ongoing process of the development of a timber legality definition (TLD) serves as an important lesson/experience for the stakeholders on how to develop TLD and for them to understand what TLD is. Furthermore, an interviewee suggests that through this process, the stakeholders can see the legal framework that is applicable in terms of the different supply chains of community forestry and plantations. This could be the starting point for others to use it when they want to get into the topic of community forestry and plantation (contribute to Outcomes 2 and 3).
  - iv. Two interviewees pointed out that the revival of the multi-stakeholder platform, the TWG-FR, is a positive step that could potentially facilitate the implementation of good forest governance elements through improving inclusiveness and transparency. The TWG-FR provides a space for a diverse group of stakeholders (non-governmental organizations, different government agencies, and donor/multilateral agencies) to contribute to the policy debates and coordination. If continued after the project completion, this platform could serve as a basis to foster further synergy and collaboration and could potentially contribute to increased legality and traceability of timber (Outcome 2).
22. Three key challenges exist for achieving the outcomes as described by interviewees:
  - i. First, legality is a rather sensitive issue in Cambodia as it will require the government and broader stakeholders to overcome the problems with transparency and improve governance along the timber value chain. Moreover, the government's hesitance to acknowledge the scale of illegal logging adds a layer of complexity. For instance, despite a report describing the evidence of illegal logging incidents in Prey Lang Sanctuary (Global initiative Against Transnational Organized Crime, 2021), the government has denied the large scale of illegal logging in the area (Thul, 2021). Some interviewees have raised concerns regarding the extent to which the government would take measures to comprehensively tackle illegal logging.

- ii. Second, while there is a consensus in the interviews among different stakeholder groups regarding the need to improve forest governance and strengthen legal trade of timber products, there are divergent views over the scope of the legality definitions. The government interviewee suggested the need to maintain a constrained and limited approach to the legality definition that strictly covers the forest plantation and community forest areas. All other stakeholders interviewed suggest that the proposed scope of legality definition is limited as it only covers community forest areas and forest plantation areas. However, substantial problems of illegality occur beyond these forest categories, particularly in economic and land concession areas and protected areas. For example, the recent report (Global initiative Against Transnational Organized Crime, 2021) showed extensive illegal logging in a major protected area in Cambodia, Prey Lang Wildlife Sanctuary, where at least 54 active logging areas were found inside the protected area.
- iii. Third, a siloed approach in forest governance in which the Ministry of Forestry and Fisheries and the Ministry of Environment manage different forest jurisdictions in Cambodia makes it challenging to coordinate efforts to develop a comprehensive timber legality definition and traceability system. For instance, it is stated in the 2020 annual report that the coordination between the Forestry Administration and other government departments has been challenging and has delayed the collection and compilation of timber production, processing, and trade statistics to develop a better understanding on important domestic timber sources (FAO, 2021).

*Evaluation question 3. What have been the most significant changes generated by the programme?*

**Finding 3.** While it is too early to harvest significant changes, the revived Technical Working Group has potentially to contribute to long term changes.

- 23. During the adapted outcomes harvesting exercise with the FAO project management team, three significant outcomes of the overall programme were identified: i) increased legality and traceability including monitoring; ii) improved competence of the private sector; and iii) increased capacities of service providers.
- 24. As mentioned in the previous section, it is too early to conclude the outcomes / changes generated by the programme as the projects in Cambodia have only started last year and some activities are still pending due to COVID-19. However, the evaluation finds that the revived technical working group could broaden the engagement of civil societies in policy discussions and potentially contribute to improved transparency and inclusiveness in forest governance in the long term.

### **3.3 Social inclusion, equity and gender**

*Evaluation question 4. To what extent have the programme interventions contributed to gender equality, equity, empowerment, and social inclusion, and reached the intended users and uses?*

**Finding 4.** The programme has made concerted efforts to ensure gender integration and social inclusion by including it in the scoring of project proposals and selecting a project with substantial gender and social inclusion measures. However, there has not been a systematic approach to monitor the enactment of the measures in project activities.

- 25. Efforts have been made by the programme to ensure gender and social inclusion in the project activities. For example, gender is one of the main criteria for evaluating project proposals, weighted at 20 percent of a proposal's overall score. Through this procedure, the programme has selected a project with clear gender and social inclusion measures, implemented by RECOFTC. In the project proposal, key measures for ensuring women's participation in project activities were

included (e.g., mandating a 30 percent minimum quota for women’s participation in workshop or project activities and organizing events to promote gender mainstreaming in forest governance) as were measures for effective engagement of local and indigenous communities.

26. However, there has not been systematic reporting in place to document the attainment of gender social inclusion outcomes. The progress reports submitted by the service provider and Forest Administration have not included sex disaggregated data on women and men’s participation in project activities. An activity report on a national consultation meeting in 2019 showed minimal participation of women in the meeting, in which only 17 of 86 participants were women (EU-FAO programme, 2019).
27. Most activities related to gender mainstreaming as described in the proposal have not begun to date as per the latest progress reports submitted by the service provider and forest administration. Therefore, it is hard to gauge the extent to which the programme has contributed to gender equality, equity and empowerment and social inclusion.

### 3.4 Partnerships

*Evaluation question 5. To what extent has the programme managed to engage with relevant, strategic, and capable partners and multi-stakeholder processes at global, regional, and national levels?*

**Finding 5.** The programme has begun engaging with strategic partners in the country and promoted multi-stakeholder processes in forest governance both at the national and local level. Efforts have also been made to create a synergy between the programme and other initiatives at regional and national level to leverage the programme results.

28. As already highlighted in previous sections, the TWG-FR multi-stakeholder platform could potentially serve as a platform to stimulate synergy and collective action for improved forest governance. At the same time, some interviewees argue that the multi-stakeholder processes facilitated by the TWG-FR platform still need to be broadened and deepened. Currently, as described by an interviewee, public access to participate in this platform remains restricted as the government selects the participants (choosing who is allowed or not allowed to participate). This has a big impact on the discussion, on what is said and not said, hence limiting open dialogues.
29. The programme has been closely engaged with relevant strategic partners in the country and at the regional level through more formal channels via the TWG-FR as well as (in)formal coordination with other donors/organizations such as the EFI, Swedish Development Cooperation (SDC), the United Nations Development Programme (UNDP), the Wildlife Conservation Society (WCS), other FAO projects and the World Bank, among others. Some examples are illustrated below:
  - i. There have been some initial discussions to build a synergy between the programme and other forest related initiatives in Cambodia, particularly with the REDD+ programme that receives substantial funding from the World Bank and other donors. As elaborated by an interviewee, during the process of drafting a REDD+ national strategy in Cambodia, a discussion arose regarding the overlaps between REDD+ and FLEGT in terms of the focus to address deforestation and forest degradation, which is the key aspect of REDD+. The potential contribution from FLEGT to the REDD+ would be clarifying the legal framework to address deforestation through illegal and legal logging. However, some interviewees suggest that the change of forest management jurisdiction in 2016 which resulted in the division of responsibilities between the Ministry of Environment (responsible for coordinating REDD+ related policies/projects) and the Ministry of Agriculture, Forestry

and Fisheries (responsible for coordinating FLEGT related policies/projects) has created a particular challenge to synergize both initiatives.

- ii. The programme has also linked to other projects that provide complementarity to the EU-FAO programme:
    - FAO RAP's Sustainable Forest Trade in the Lower Mekong Region Project aims to improve sustainable timber trade in several countries that include Thailand, Myanmar, Cambodia, Lao People's Democratic Republic and Viet Nam. This project is supported by the Norway REDD+ implemented in the Mekong region by the FAO team.
    - The Japanese government has funded a project with FAO entitled "Enhancing knowledge and capacity around forest-related legislation and timber legality", which will develop an online database (Timber-Lex) to increase access to and understanding of national legal frameworks governing forest management and timber production and trade in 50 countries, including Cambodia. A country profile for Cambodia has been developed under this project via desk reviews of current national legislation which will be catalogued according to the applicable government legislation (FAO, 2020b). This project contributes to identify gaps, overlaps, and inconsistencies among legal instruments that will provide important inputs for Cambodia's timber legality definition.
    - SDC provides support for the development of a Forest Resource Monitoring Information System (worth USD 25 000) under the FLEGT Roadmap in Cambodia.
    - The programme secured an agreement with the International Timber Trade Organization to contribute to a joint study to analyze timber production and flow in Cambodia. However, this did not take off because of concerns from the government in sharing sensitive data information.
30. The project implemented by RECOFTC has facilitated the community forestry network in four provinces in which each province has a provincial community forestry network. RECOFTC also connects the subnational networks with the national network, such as the TWG-FR. The subnational coordination is very important for the community forestry development and engagement, in which the network platform is used for coordination and conflict resolution in terms of land encroachment and conveys issue from the community to the stakeholders.
  31. While there is a lot of interest from donors to invest in development initiatives in Cambodia, the scope to tap into these sources to leverage the programme is limited. An interviewee suggests that FLEGT is often associated with a trade agreement between the European Union and the partner countries, hence limiting the scope of relevance for other donors to align with the programme.

### 3.5 Potential sustainability

*Evaluation question 6. What are the sustainability prospects of the programme results and what is their potential to contribute to long-term changes?*

**Finding 6.** Because of the short implementation period (2019–2021), sustainability prospects of the programme results are at stake with the completion of the programme. All key interviewees expressed concern regarding the sustainability of results and long-term impacts after the programme completion at the end of this year. Some activities might be carried over by the FAO project entitled Sustainable Forest Trade in the Lower Mekong Region Project and other supports for the next two to three years.

32. Some interviewees argued that with the enormous challenges to improve forest governance in Cambodia, initiating a programme within a short time frame (only two years prior to its completion) with limited investment and no assurance on future support might not be a strategic decision as it immediately raises questions and concerns about the prospect of sustainability and long-term impacts. Most interviewees express doubt regarding the sustainability potential of the programme results.
33. Interviewees suggested several potential projects that might carry further some activities initiated by the programme for the next few years:
  - i. First, the “Sustainable forest trade in the Lower Mekong region” project is halfway completed (will complete in 2022). The objectives are overlapping with the FLEGT III project. The project team indicated that they would carry over some activities under the FAO-EU programme in Cambodia, such as activities related to the development of a timber legality definition in production forest.
  - ii. Second, RECOFTC recently received funding from SDC for the Partnership for Forestry and Fisheries Communities in Cambodia (PAFF) and different funding sources. Key interviewees in RECOFTC indicated that they would potentially continue some activities for pilot testing the legality framework for timber harvesting in community forests.

### 3.6 Programme management

*Evaluation question 7. To what extent were the management and implementation arrangements appropriate?*

**Finding 7.** The programme management and decentralized implementation arrangements are clear and effective. All interviewees expressed positive views on the programme management, communication, and coordination with service providers and partners in Cambodia. The short project duration and prolonged approval processes were highlighted as points for attention.

34. The programme management and decentralized implementation arrangements are clear and effective. All interviewees suggested that they have received sufficient and relevant technical and administrative supports from the FAO team on technical issues and compliance with the FAO administrative requirement. There are two dedicated technical consultants for the projects in Cambodia: A technical consultant based in the country who manages overall project implementation in the country and another technical consultant in Southeast Asia who provides technical supports to several non-VPA countries in the region, including Cambodia and a regional coordinator who oversees overall FAO-EU FLEGT implementation in the region.
35. The programme communication strategy has been deemed effective by a service provider and partners for in-country coordination. Initial communication materials to increase public awareness on the issues have been published, such as on legal timber harvesting in community forest (FAO, 2021).
36. As mentioned in the section on sustainability, some interviewees pointed out that the short duration of projects needs to be reconsidered. It is difficult to push for a transformational change in a short period of time (12 months project duration) considering the big goal of Cambodia’s FLEGT road map and substantial challenges encountered for promoting good forest governance given the complex socio-political situation in the country. They further suggested that the constraining nature of the programme, where most activities must secure the government’s approval, has significantly limited the ability of the service providers to pivot when new challenges arise.

## **4. Lessons learned**

37. Transforming forest governance and tackling illegal logging are enormous undertakings, particularly when such initiatives are implemented in a country that has significant challenges with regards to transparency and accountability in forest governance and to the lacunae of legal frameworks on timber legality definition, such as Cambodia. It will require a combination of a substantial long-term investment targeting a systematic forest governance change, small grant mechanisms to strengthen civil society organizations in the sector, and efforts to make a stronger synergy with other forestry initiatives in the country and at the regional levels.

## **5. Observations**

38. Cambodia's timber exports to neighbouring countries, particularly Viet Nam, mean that FLEGT actions are significant to secure timber legality and ensure traceability along the supply chain. Support is still needed to broaden the coverage of a timber legality definition as well as finalize and test the timber legality framework that is initiated by the programme.
39. FAO-EU FLEGT support has a clear added value in Cambodia and is complementary to existing forms of support for improving good forest governance. Despite the limited budget invested, the programme has the potential to deliver important results. However, the delayed project implementation and the short duration of projects have made it difficult to see the changes that happen on the ground to date.
40. The revitalization of a multi-stakeholder forestry working group at the national level could enhance broader engagement of different interest groups in forestry. In the long run, the multi-stakeholder working group could help address silo issues among different interest groups and sectors and polarized positions toward forestry policy reform.

## Bibliography

- Al Jazeera.** 2019. Plundering Cambodia's Forest. In: Al Jazeera [online]. Doha. <https://interactive.aljazeera.com/aje/2019/plundering-cambodias-forests/index.html>
- Environment Investigation Agency.** 2017. *Repeated offender: Vietnam's persistent trade in illegal timber.* London. <https://eia-international.org/report/repeat-offender-Vietnams-persistent-trade-illegal-timber/>
- Anonymous.** n.d. *What Cambodia Means for EU-Vietnam VPA.* Unpublished document.
- Environmental Investigative Agency.** 2018. *Serial Offender: Vietnam's Continued Imports of Illegal Cambodian Timber.* London. <https://eia-international.org/wp-content/uploads/eia-serial-offender-web.pdf>
- EU-FAO Programme.** 2019. *Proceeding on National Workshop on Forest Law Enforcement, Governance and Trade (FLEGT) of Legal Timber in Cambodia.* Unpublished document.
- EU-FAO Programme.** 2020. *Work Plan FAO-EU FLEGT Cambodia.* Unpublished document.
- FAO.** 2019. *Cambodia Creates a Roadmap that Enhance Forest Governance.* Rome. <http://www.fao.org/cambodia/news/rss/detail-events/fr/c/1179039/>
- FAO.** 2020a. *Annual Report 2020 Phase III – EU FLEGT Programme.* Rome.
- FAO.** 2020b. *Work Plan for Cambodia.* Rome. Unpublished document.
- FAO.** 2021. *Cambodia Strengthens Community Forestry.* Rome. <http://www.fao.org/in-action/eu-fao-flegt-programme/from-the-field/stories-details/en/c/1370481/>
- FAO-EU FLEGT.** 2019. *Final Proceeding: National Workshop on Forest Law Enforcement, Governance and Trade (FLEGT) of Legal Timber in Cambodia.* Rome.
- Global Forest Service, Forestry Administration and EU FLEGT Facility.** 2014. *Understanding Timber Control and Flows in Cambodia in the Context of FLEGT.* Technical Working Group on Forestry Reform. Rome.
- Kresek, K.** 2019. What's happening to Cambodia's forests. In: *Global Forest Watch* [online]. Washington, DC. <https://www.globalforestwatch.org/blog/data-and-research/whats-happening-in-cambodias-forests/>
- Milne, S.** 2015. Cambodia's Unofficial Regime of Extraction: Illicit Logging in the Shadow of Transnational Governance and Investment. *Critical Asian Studies*, 47(2): 200–228.
- Ministry of Agriculture, Forestry and Fisheries.** 2021. *Progress Report (April-June 2021): Capacity Building on Law Enforcement and Forest Products Trade Procedures and Piloting of Legal Timber Production and Governance Mechanisms in Plantation Areas.* Pnomh Penh.
- RECOFTC.** 2021. *Progress Report (April-June 2021): Pilot Demonstration of Legal Timber Harvesting in Community Forest Areas in Cambodia.* Bangkok.
- To, P., Tran, H., Cao, C., Nguyen, Q., & Huynh, H.** 2018. *Vietnam's Export of Wood and Wood Products.* [http://goviet.org.vn/upload/aceweb/content/Final\\_Ban%20tin%20XNK%20G.SPG%202015.6T%202018%20ToNG%20QUAN.pdf/](http://goviet.org.vn/upload/aceweb/content/Final_Ban%20tin%20XNK%20G.SPG%202015.6T%202018%20ToNG%20QUAN.pdf/)
- To, P. X., & Mahanty, S.** 2019. Vietnam's Cross-border Timber Crackdown and the Quest for State Legitimacy. *Political Geography*, 75, 102066. <https://doi.org/10.1016/j.polgeo.2019.102066>
- Thul, C.P.** 2017. U.S. Ends Cambodia Aid Programme over Arrests Targeting Activists. In: *Rueters* [online]. <https://www.reuters.com/world/asia-pacific/us-ends-cambodia-aid-programme-over-deforestation-targeting-activists-2021-06-17/>
- Yasmi, Y., Durst, P., Ul Haq, R. and Broadhead, J.** 2017. *Forest Change in the Greater Mekong Subregion: An Overview of Negative and Positive Drivers.* Rome, FAO.



## Appendix 1. People interviewed

Last name	First name	Position	Organization
Becker	Clemens	Attaché Natural Resources Management – Climate Change	EU Delegation for Cambodia
Burli	Markus	Director of Cooperation	Swedish Development Cooperation
Cammaert	Bruno	Regional Technical Advisor	FAO ROAP
Chansopheak	Ann	Operations Coordinator, Forestry Programme	FAO Cambodia
Heng	Da	Programme coordinator for EU-FAO FLEGT Programme	RECOFTC Cambodia
Hou	Kalyan	Director	RECOFTC Cambodia
Lorn	So	Deputy Director, Forestry Industry and International Cooperation	Forestry Administration
Nguon	Pheakkdey	Forest Governance Expert	European Forestry Institute (EFI)
Ouch	Kemly	Cambodia National Programme Coordinator	FAO Cambodia - FAO Sustainable Forest Trade in the Lower Mekong Region (SFT-LMR)
Pohan	Erica	Regional Technical Consultant	FAO ROAP
Sar	Sophyra	National Forestry Specialist	FAO Cambodia
Saramany	Duong		Swedish Development Cooperation

Office of Evaluation  
evaluation@fao.org  
www.fao.org/evaluation

**Food and Agriculture Organization of the United Nations**  
Rome, Italy



Some rights reserved. This work is available  
under a CC BY-NC-SA 3.0 IGO licence.