



Timber Legality Risk Dashboard: Cambodia

Drafted as of: November 2021

SUMMARY OF LEGALITY RISKS

Risk Scores: 89.7 (Higher Risk^a)¹

Conflict State: NO

Log Export Restriction in Effect: YES²

Import Regulation in Effect: NO

- There is a high risk of illegal logging and trade for timber products originating from Cambodia.
- Economic Land Concessions (ELCs) for infrastructure and commercial agriculture projects allow “pseudo-legal timber extraction, saw-milling, and wood transportation” as well as “the laundering of illegally harvested timber in equal, if not greater, proportions.” Using the ELC system as a tool for timber harvesting in natural forests is rampant but considered illegal. Corruption is reportedly a concern in the allocation of ELCs.
- NGOs continue to document incidents of illegal logging in protected areas.
- There remains a risk of unsustainable and illegal trade in Convention on International Trade in Endangered Species (CITES)-listed species.
- Enforcement is weak and hampered by corruption.
- Historically, there has been a risk of illegal cross-border trade to Vietnam but this has reportedly declined in recent years.

TRADE PROFILE OF FOREST PRODUCTS^{B,C,3,4}

Total Imports (2019): \$614.7 million

Total Exports (2019): \$348.13 million.

\$285.52 million (82 percent) declared as exported to “regulated markets”^d

SUMMARY OF HIGHEST PRODUCT-LEVEL RISKS

Exports – Top Products Exported to the U.S. by 2019 Value⁵

- Plywood (HS4412)
- Flooring, Molding & Strips (HS4409)
- Wood Furniture – Seating (HS940161 & HS940169)
- Paper (HS48)
- Wood Furniture – Kitchen (HS940340)
- Wood Furniture – Other (HS940360)
- Wood Furniture – Office (HS940330)
- Joinery Products (HS4418)

Cambodia has banned the export of logs and sawnwood since 1996.^{e,6,7,8,9} In 2006, Cambodia reaffirmed these restrictions, banning the export of rough logs, squared logs, firewood and charcoal from natural forests.^{f,10} These export prohibitions are presumed to remain in force.^{g,11,12,13,14} From 2007 - 2020, Cambodia also prohibited the export of recovered paper (HS4706) and wastepaper (HS4707).^{15,16} Cambodia has also restricted the export of certain rare and endangered species since 2002,¹⁷ and Siamese rosewood (*Dalbergia cochinchinensis*) in particular since 2013.^{18,19}

In January 2016, Cambodia announced a prohibition on all timber exports to Vietnam in conjunction with the creation of a Coalition Committee for Forest Crime Prevention,^{20,21,22} which later became known as the National Committee for Forest Crime Prevention, although Cambodian timber continues to illegally cross into Vietnam.^{23,24,25}

SUMMARY OF HIGHEST SPECIES-LEVEL RISKS

Illegal logging and trade affect many timber species, but highly valuable - often rare and endangered - species that are protected under harvest and/or trade regulations are a key target and at an elevated risk for illegality. The following species are either currently, or have recently, been protected in Cambodia.

CITES-Listed Species (Appendix II):²⁶

Appendix II:

- **Rosewood** (*Dalbergia* spp.)
- **Agarwood** (*Aquilaria baillonii*; *Aquilaria crassna*)

Species Banned from Harvest:^h

Luxury Species^{27,28}

- **Siamese Rosewood/ Kra Nhoung** (*Dalbergia cochinchinensis*)
- **Siamese Cassia or Ang kahn** (*Senna siamea* (syn. *Cassia siamea*))
- **Angkat Khmao** (*Diospyros bejaudi*)
- **Beng** (*Azizia xylocarpa* (syn. *Pahudia cochinchinensis*))
- **Chheu Khmav** (*Diospyros* spp.)
- **Cheung Chap** (*Dasydaschalom lomentaceum*)
- **Chress** (*Albizia lebbekoides*)
- **Haisan or Chansor** (*Senna garrettiana* (syn. *Cassia garrettiana*))
- **Hundang or Mrasprao Phnum** (*Dysoxylon loureiroi*)
- **Kreul (Gluta laccifera** (syn. *Melanorrhoea laccifera*))
- **Neang Nuon** (*Dalbergia bariensis*)
- **Ta Trav** (*Cyrtophyllum fragrans* (syn. *Fagraea fragrans*))
- **Thnong** (*Pterocarpus macrocarpus* (syn. *Pterocarpus pedatus*))
- **Trar Yeang** (*Diospyros oblonga* (syn. *Diospyros helferi*))

Species banned from harvest or trade:^{i,29}

Endangered or Rare Species^{30,31}

- **Siamese Rosewood** (*Dalbergia cochinchinensis*)
- **Neang Nuon** (*Dalbergia bariensis*)
- **Chann Krasna** (*Aquilaria crassna*)
- **Beng** (*Azizia xylocarpa*)
- **Kra Nhoung** (*Dalbergia cochinchinensis*)

- **Chheu Khmav** (*Diospyros crumenata*)
- **Ta Trav** (*Cyrtophyllum fragrans* (syn. *Fagraea fragrans*))
- **Day Khla, Bak Dong** (*Gardenia ankorensis*)
- **Chheu Phleung** (*Diospyros heishi* (syn. *Diospyros nitida*))
- **Thnorng** (*Pterocarpus* spp.)
- **Angkat Khmao** (*Diospyros bejaudi*)
- **Chheuteal Teuk, Resin Tree** (*Dipterocarpus alatus*)
- **Phdeak** (*Anisoptera costata*)
- **Daun Chem** (*Heritiera javanica* (syn. *Terrietia javanica*))
- **Cheungchap Phnom** (*Dasydaschalom lomentaceum*)
- **Sralao** (*Lagerstroemia* spp.)
- **Mrasprao Phnom** (*Dysoxylon loureiroi*)
- **Chres** (*Albizia lebbekoides*)
- **Popel** (*Shorea roxburghii* (syn. *Shorea cochinchinensis*))
- **Koki Msav** (*Hopea odorata*)
- **Haisan** (*Senna garrettiana* (syn. *Cassia garrettiana*))
- **Voro Miet** (*Fibraurea tinctoria*)
- **Koki Thmor** (*Hopea ferrea*)

Species banned for use by timber industry:^{32,33,j}

- **Sdav** (*Azadirachta indica*)
- **Russey Prey** (*Bambusa bambos* (syn. *Bambusa arundinacea*))
- **Samrorng** (*Scaphium affine* (syn. *Sterculia lychnophora*))
- **Kreul (Gluta laccifera** (syn. *Melanorrhoea laccifera*))
- **Pdav, Rattan** (*Calamus* spp.)
- **Kravanh** (*Amomum kravanh*)
- **Chann Krasna** (*Aquilaria crassna*)
- **Kamping Reach** (*Sandoricum koetjape* (syn. *Sandoricum indicum*))
- **Sra Mar** (*Terminalia chebula*)
- **Kngaok** (*Delonix regia*)
- **Kou Len** (*Litchi chinensis*)

- **Popel** (*Shorea roxburghii* (syn. *Shorea cochinchinensis*))
- **Tepirou** (*Cinnamomum cambodianum*)
- **Tumpaing Baychou Prey** (*Ampelocissus arachnoidea*)
- **Trabek Prey** (*Lagerstroemia floribunda*)
- **Se Mornn** (*Nephelium hypoleucum*)
- **Chor Chong** (*Shorea guiso* (syn. *Shorea vulgaris*))
- **Smach** (*Melaleuca leucadendra*)
- **Morum** (*Moringa oleifera*)
- **Thmear** (*Senegalia intsia* (syn. *Acacia intsia*))
- **Phnao** (*Aegle marmelos*)
- **Phlou** (*Dillenia ovata*)
- **Preah Phnao** (*Terminalia triptera* (syn. *Terminalia nigrovenulosa*))
- **Angkear Dey** (*Sesbania grandiflora*)
- **Sleng** (*Strychnos nux-vomica*)
- **Mdeinh** (*Alpinia officinarum*)
- **Kanthum Thet** (*Leucaena leucocephala*)
- **Chheuteal Teuk** (*Dipterocarpus alatus*)

FORESTRY SECTOR

Forested Area: 8.07 million ha³⁴ (39% protected)³⁵

Deforestation Rate: 2.7% annually³⁶

Forest Ownership (as of 2015):³⁷

- 8.85 million ha publicly-owned (100%)

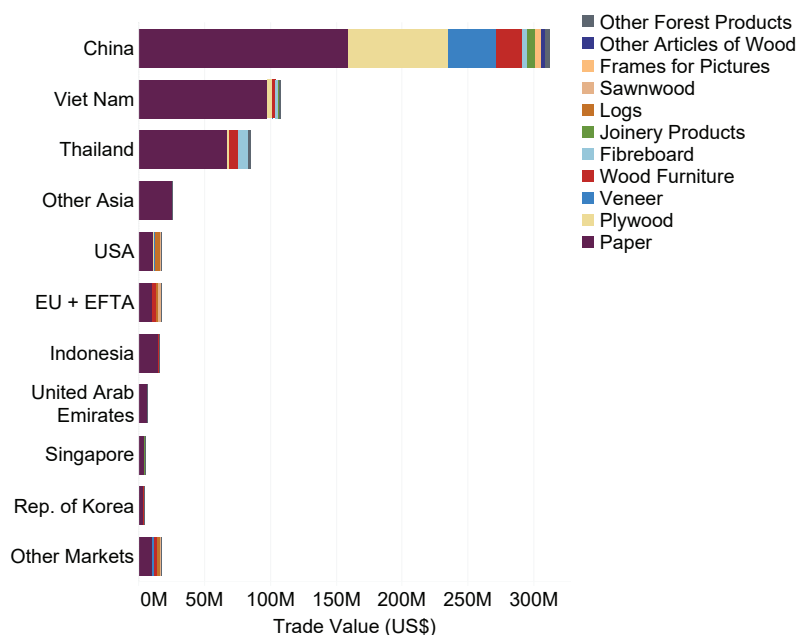
Certified Forests:

- FSC Certification: 7,896 ha (2019)³⁸

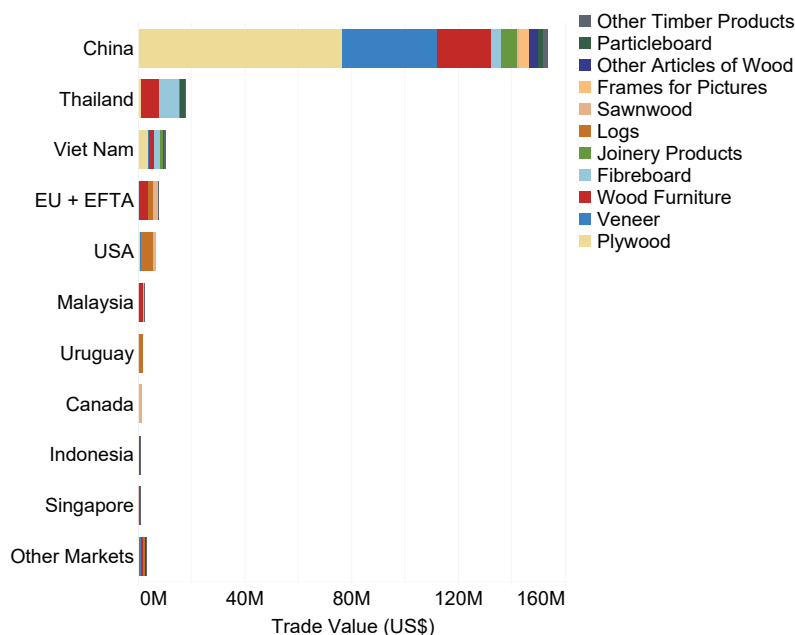
Domestic Production:³⁹

- Wood Fuel: 7.37 million m³ (2019)
- Logs: 322 thousand m³ (2019)
- Sawnwood: 152 thousand m³ (2019)
- Plywood: 152 thousand m³ (2019)
- Veneer: 21 thousand m³ (2019)
- Charcoal: 38 thousand tonnes (2019)
- Paper: 20 thousand tonnes (2019)

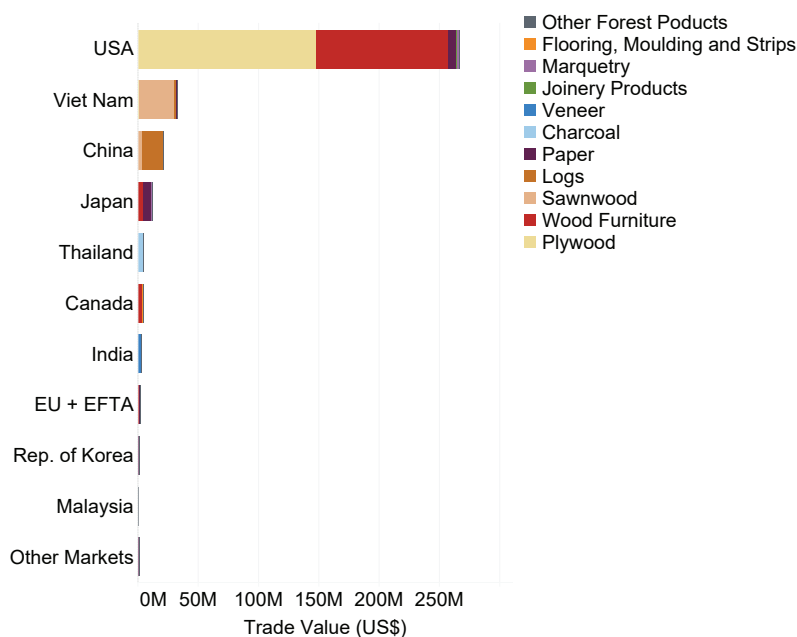
CAMBODIA'S TOP SOURCE MARKETS FOR FOREST PRODUCTS BY IMPORT VALUE (2019)^{K,40}



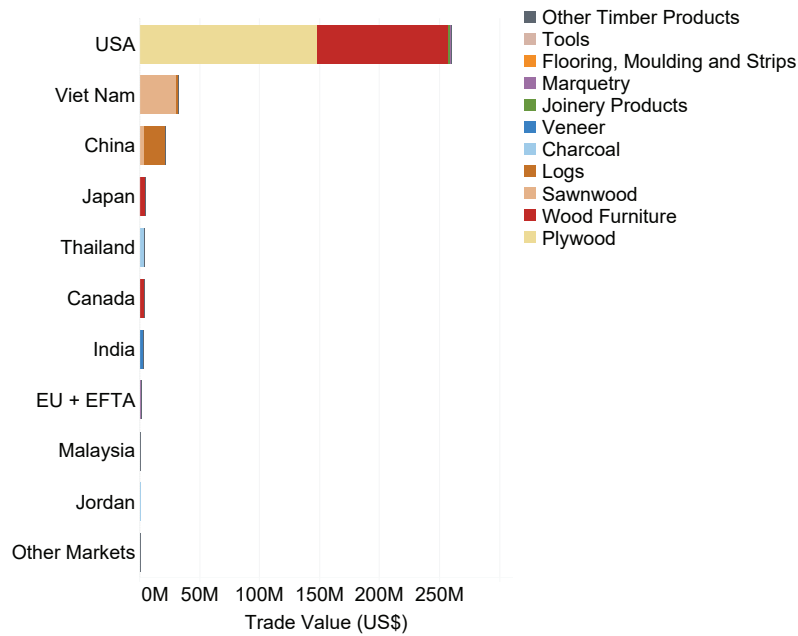
CAMBODIA'S TOP SOURCE MARKETS FOR TIMBER PRODUCTS BY IMPORT VALUE (2019)⁴¹



CAMBODIA'S TOP DESTINATION MARKETS FOR FOREST PRODUCTS BY EXPORT VALUE (2019)⁴²

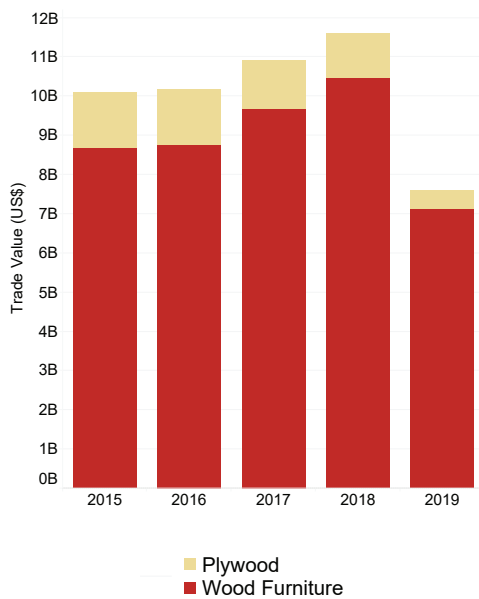


CAMBODIA'S TOP DESTINATION MARKETS FOR TIMBER PRODUCTS BY EXPORT VALUE (2019) ⁴³

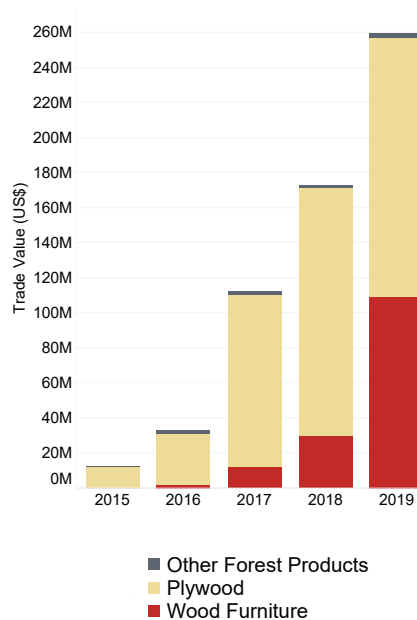


IMPACT OF TRADE TARIFFS: U.S. IMPORTS FROM CAMBODIA (2015 - 2019) COMPARED WITH U.S. IMPORTS FROM CHINA AND CHINESE EXPORTS TO CAMBODIA ^{L,44}

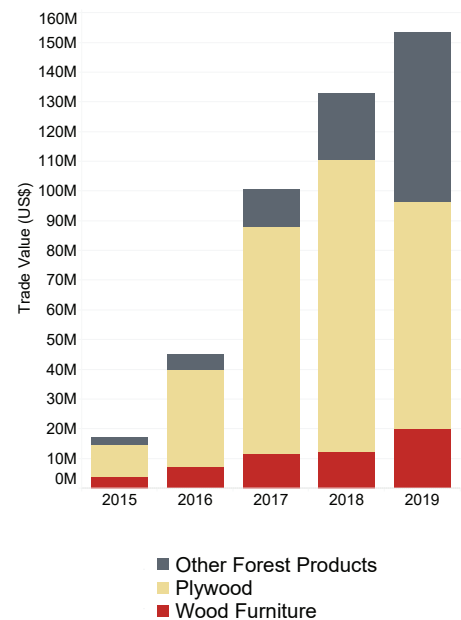
U.S. Imports of Wood Furniture and Plywood from China



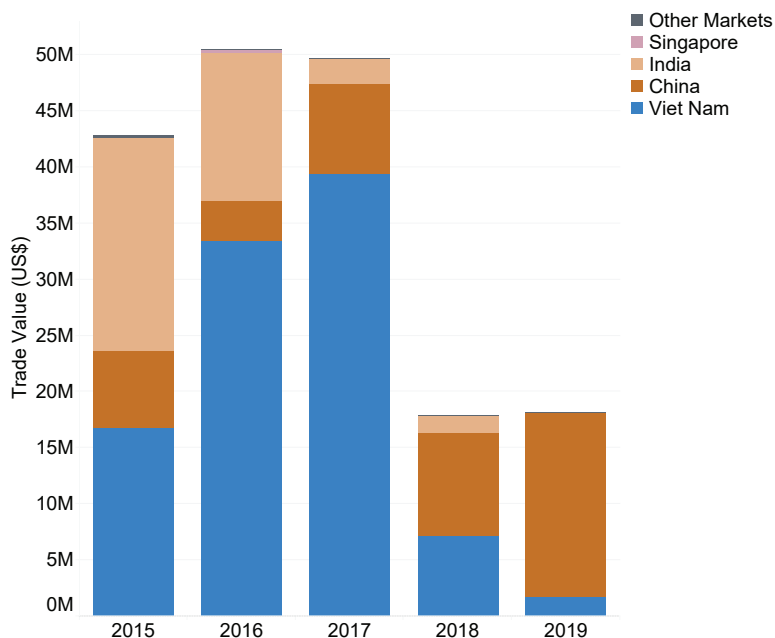
U.S. Timber Product Imports from Cambodia



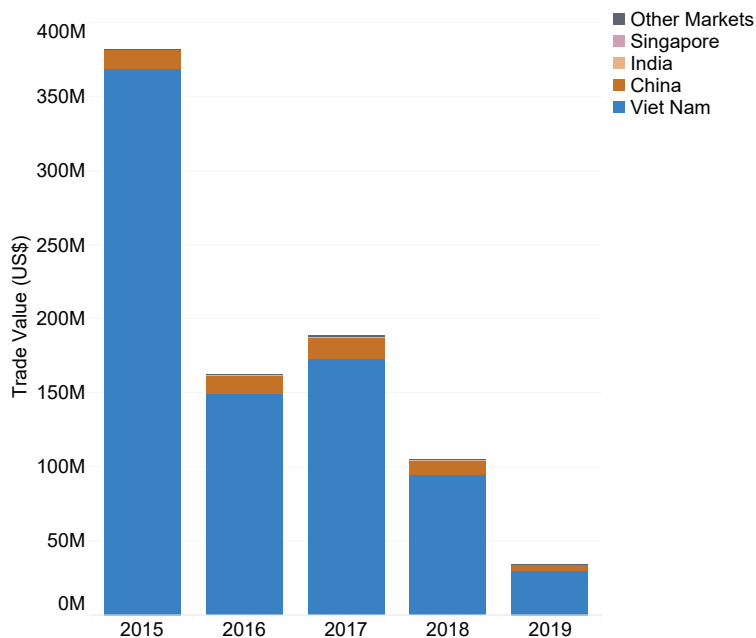
Chinese Timber Product Exports to Cambodia



HIGH-RISK TRADE: GLOBAL IMPORTS OF CAMBODIAN LOGS IN YEARS IN WHICH CAMBODIA HAD AN ACTIVE LOG EXPORT RESTRICTION⁴⁵ (2015-2019)⁴⁶



HIGH-RISK TRADE: GLOBAL SAWNWOOD IMPORTS OF CAMBODIAN SAWNWOOD IN YEARS IN WHICH CAMBODIA HAD AN ACTIVE SAWNWOOD EXPORT RESTRICTION⁴⁷ (2015-2019)⁴⁸



Cambodia has seen high rates of forest loss over the last few decades. Between 1973 and 1993 the country saw an annual rate of forest loss of approximately 0.5 percent. Such losses were reportedly caused by commercial logging and 30 years of civil war and political instability.⁴⁹ As deforestation rates continued to increase, the government banned log exports in 1996, joined the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) in 1997 and instituted a concession system. Between 1994 and 1997, the government granted 36 forest concessions that collectively covered 7 million hectares.⁵⁰ Reports have estimated that 95 percent of the timber harvested between 1997 and 1998 was illegally felled.⁵¹ The government of Cambodia adopted a logging moratorium in 2002. The restrictions did not apply to other types of concessions in the country. Timber may be sold or exported from agriculture and infrastructure concessions, as well as community forestry areas, social land concessions and privately owned or managed plantations.^{m,52}

Cambodia lost almost 2.5 million hectares of tree cover between 2001 to 2020, a 28 percent loss in tree cover since 2000.⁵³ The annual rate of loss increased by more than 400 percent over the same period with nearly 150,000 ha of loss occurring in 2020 alone, of which nearly half (43 percent) was to natural forest.^{54,55}

- **There is a high risk of illegal logging and trade for timber products originating from Cambodia.**

Cambodia's forest area is estimated at 8.1 million hectares or 46 percent of the total land area in 2020.⁵⁶ Natural forests account for 92.5 percent of the forest area but are not a source of legal timber as natural forest concession activities have been suspended since 2002, and several (but not yet all) forest concessions have been formally cancelled.⁵⁷ The main reported species include several species of *Dipterocarpus*, all of which are endangered (*Dipterocarpus alatus* [resin tree], *D. costatus*, *D. dyeri*, *D. inricatus*, *D. obtusifolius*, and *D. tuberculatus*), as well as *Anisoptera costata* (syn. *Anisoptera cochinchinensis*, also known as phdeak in Khmer and mersawa in Malay), *Anisoptera robusta*, *Heritiera javanica* (syn. *Tarritia javanica*), and *Hopea pierrei*.⁵⁸

Legal reforms in 2017 expanded Cambodia's protected area system to cover over 7.4 million hectares, 41 percent of Cambodia's surface area.⁵⁹ This means that over 80 percent of Cambodia's forest area is allocated for protection and technically managed for conservation, though a number of Economic Land Concessions (ELCs) were granted inside these protected areas and as such, the total area of protected forests is lower in practice.⁶⁰ Despite this significant allocation and commitment to forest conservation, Cambodia reportedly lost over three quarters of a million hectares (778,643 ha) of forest in protected areas between 2000 and 2020.⁶¹ Over 77,000 hectares was lost in protected areas in 2020 alone, a 661 percent increase on protected area forest loss in 2000.⁶² The Ministry of Environment has jurisdiction over protected area management but following Sub-decree No. 69 (Sub-decree ANK/BK No. 69, issued on 28 May 2016), the government re-organized so that the Ministry of Agriculture, Forestry and Fisheries (MAFF) has responsibility for production forests and concessions including those allocated in protected areas with monitoring and technical management carried out by the Forestry Administration, a MAFF department.

There are two types of concessions:

Logging Concessions in natural forest which have been suspended since 2002 and are not a source for legal timber.⁶³

Economic Land Concessions (ELCs) which include state land that is classified as production forest or within the protected area system. ELC contracts are allocated to private companies to develop and convert forest area for other uses. Since 2014, ELCs can be awarded for agro-industrial purposes (including forest plantations) for a lease maximum of 50 years and for areas no greater than 10,000 hectares.⁶⁴ In 2020, forest plantations were reported to cover 603,970 hectares, a significant increase in area since 1990.⁶⁵ A limited volume of timber actually originates from forest plantation areas as the vast majority of timber plantations are in early stages of development, which means that sourcing from plantations is limited to rubberwood.⁶⁶ It is estimated that as much as 90 percent of Cambodia's timber production originates from forest conversion,⁶⁷ and ELCs are currently the largest source of timber in Cambodia. Confiscated timber is also an important source of timber, though no transparent auctioning system reportedly exists.⁶⁸ According to the Forest Law 2002, concessions are granted through public bidding. A Harvest Permit must be issued to authorize logging of the concession, after which the concession company has the right to develop the ELC.⁶⁹

Timber from community forestry areas can also be legally harvested and exported as long as the timber is purchased by Timber Export Companies.⁷⁰ However, community forests in Cambodia are generally not commercial ventures, rather, used by local customary landowners for non-timber forest products (NTFPs) and small-scale logging. Preferred by Nature noted that

as of late 2020, there is no timber available from community forestry areas because almost all the community forestry sites have been established after 2004 and timber is not yet ready for harvesting.⁷¹ The Cambodian Sub-Decree on Community Forestry Management (2003) does not allow the harvest of forest products within the first five years of approval of the Community Forest Management Plan, a document which grants a community rights to plant, manage, and harvest forest products and NTFPs.

Risks of illegality are high in Cambodia with Preferred by Nature reporting risks associated with land tenure, licensing and permits, and continuing through to payment of taxes and compliance with employment laws, health and safety and wildlife protection.⁷² An assessment of forest governance by forest stakeholders gave Cambodia the lowest score of all countries in the Greater Mekong Subregion and concluded that Cambodia's forest governance was failing. Unclear tenure arrangements and the abuse of rights of forest communities were concluded to be pressing issues, and sanctions for illegal activities were rated as ineffective.⁷³

- **Economic Land Concessions (ELCs) for infrastructure and commercial agriculture projects allow “pseudo-legal timber extraction, saw-milling, and wood transportation” as well as “the laundering of illegally harvested timber in equal, if not greater, proportions”. Corruption is reportedly a concern in the allocation of ELCs.**

After the logging moratorium in 2002, ELCs became “the new logging mechanism”.⁷⁴ ELCs were introduced as an instrument under the Land Law (2001) but never meant to apply to state forest land. However, the Government of Cambodia allocated up to 2.6 million hectares in ELCs, more than 10 percent of the entire country,⁷⁵ until a moratorium on the allocation of new ELCs in 2012. Complaints about displacement and land grabbing led to a judicial review and subsequent reduction in the ELC area to an estimated 1.2 million hectares, though there is reportedly still a lack of transparency and clarity on boundaries and contracts.⁷⁶ ELC allocations have reportedly caused forced evictions and land conflicts as many farmers and local communities did not have formal tenure or were unable to prove ownership, and were not consulted, informed or given means of redress.^{77,78} A 2018 forest governance assessment found Cambodia to be failing on the allocation of concessions for forest conversion, access to information before and after decision making, and disclosure of financial information and audit result.⁷⁹

ELCs provide investors with the right to fell trees to clear the land for development, effectively allowing them to circumvent the 2002 logging moratorium.⁸⁰ A 2018 study found that ELCs are 57 percent more likely to be placed in areas with high carbon values than in already-degraded land.⁸¹ Regardless of where an ELC is located, it is illegal to log outside a granted ELC and to launder timber through an ELC. However, there are reports that protected tree species are illegally harvested both within and outside ELCs.⁸²

The allocation of ELCs has historically been tied with corruption in Cambodia. Illicit logging, and the awarding of forest conversion contracts without due process reportedly created the conditions for “a mutually reinforcing system that has provided military officials, emergent tycoons and state officials with legal cover and spectacular wealth,” a form of land grabbing that “supported regime consolidation”.⁸³ Members of the political, military and business elite who were awarded ELC licenses were in turn required to make contributions back to the ruling party; and there are documented cases of concession owners and logging companies paying the salaries of, and building offices for, the army, civil servants and ruling party in the areas around their concessions.^{84,85,86}

There have also been reports that ELC logging syndicates are owned and controlled by wealthy families within or connected to the highest levels of the Cambodian government. For example, Global Witness accused Oknha Try Pheap of being at the helm of an illegal logging network that relies on the collusion of state officials and law-enforcement agencies to poach rare trees such as Siamese rosewood, traffic logs across the country and load them onto boats bound for Hong Kong.⁸⁷ Many of the ELC logging companies reportedly have connections that provide them immunity from arrest and prosecution by lower-ranked law-enforcement personnel, and there have also been allegations of complicity and corruption among civil servants in various government agencies and departments.⁸⁸

- **NGOs continue to document incidents of illegal logging in protected areas.**

Cambodia's Protected Area Law (2008) and related sub-decrees allow forests to be classified as “sustainable use zones.” These are defined as areas of high value for economic development that promotes standards of living of the local communities, including and indigenous and ethnic minorities who live in greater concentration within and around protected

areas. Sustainable Use Zones include the following sites: national cultural and heritage; ecotourism; wildlife conservation and recreational services; biological rehabilitation; community protected areas; botanic gardens; infrastructure development, irrigation, electricity generation, mining; and resin exploitation. Development within sustainable use zones requires government approval and is subject to environmental and social impact assessments. However, forests have been cleared in protected areas, and ELCs established, under the sustainable use zone category. Once established, they are not monitored to see whether economic activity is taking place in a zone slated for protection rather than use.⁸⁹

Prey Lang is a region of lowland tropical forest spanning four provinces (Kratie, Preah Vihear, Steung Treng and Kampong Thom) in central-north Cambodia, originally covering 500,000 hectares.⁹⁰ The Prey Lang protected area was designated a wildlife sanctuary in May 2016. In 2010, Think Biotech Co. Ltd was granted a 34,000 hectare forest-restoration concession adjacent to the Prey Lang Wildlife Sanctuary with the aim of restoring a 'degraded' forest at the edge of Prey Lang forest.⁹¹ Logging operations began in the forest-restoration concession in 2012, with the company engaging in clear-cutting of the remaining natural forests to establish industrial monoculture forests, including trees of acacia, eucalyptus and some teak. However, in December 2018, following the resignation of the Korean investors, Think Biotech restructured and in 2019 ownership passed to the owners of Angkor Plywood which led to the closure of the original sawmill and the development of a new one, which became operational in 2019. The change of ownership also coincided with increased trespass logging within Prey Lang Wildlife Sanctuary and rapid clearing of mature forest in the concession. Reports suggest that logging of rare and protected timber species outside the concession, namely rosewoods and oleoresin trees from within the Prey Lang Wildlife Sanctuary itself has been taking place with intensification in rates of illegal logging in 2020 during the COVID-19 pandemic.⁹²

A surge in deforestation alerts from Cambodia's Prey Lang Wildlife Sanctuary has raised concerns that the timber firm is illegally logging the protected area.⁹³ The Ministry of the Environment conducted an investigation into illegal logging in October 2019 after concerns were raised by the European Union and the United States Agency for International Development, but Think Biotech was cleared.^{94,95} Global Witness has established family links between Think Biotech's Chairman Lu Chu Chang, also president of the Cambodia Timber Industry Association, and Prime Minister Hun Sen and other senior officials.⁹⁶ In 2020, researchers at the University of Copenhagen wrote an open letter regarding the scale of forest loss in the Prey Lang Wildlife Sanctuary in 2019 (which included 7,510 hectares of loss, a 73 increase in forest loss in 2019 compared with 2018). They also raised the plight of the Prey Lang Community Network (PLCN), a local group that monitors illegal logging, whose patrols were banned by the Ministry of Environment.^{97,98} In February 2021, Ouch Leng and Heng Sros from PLCN were arrested for speaking out on illegal logging. Heng Sros had made statements about illegal logging, saying, "I have interviewed workers who transport the wood from Prey Lang, and they admitted that their bosses paid and bribed the environmental officials to transport the timber".⁹⁹ In 2021, Amnesty International analysed satellite images and identified piles of logs in a newly-cleared area just outside Prey Lang, and new access roads cut through the forest into the Wildlife Sanctuary.¹⁰⁰ Amnesty International warns that a deal signed in December 2020 by the Cambodian Ministry of Mines and Energy for the construction of a 299km-long power transmission line from Phnom Penh to the border with Lao People's Democratic Republic threatens further clearings, as the power line would divide Prey Lang in two.

The Keo Seima Reducing Emissions from Deforestation and Degradation plus conservation (REDD+) project achieved the first sale of Cambodian REDD+ carbon credits for the prevention of the emission of more than 14 million metric tons of carbon dioxide equivalent (CO₂e) between 2010–2019. This project included the Eastern Plains Landscape, which covers an area of more than 30,000 square kilometers mainly in Mondulkiri province and contains the most extensive intact block of remaining forest in Southeast Asia.¹⁰¹ However, even though most of Mondulkiri province is designated a protected area, there are more than 20 companies with land concessions. Interior Minister Sar Kheng declared in 2018 that illegal logging in Mondulkiri province was "rampant" and called for an amendment to the Forest Law to delegate more power to local authorities¹⁰². Forest campaigner Marcus Hardtke said, "Deforestation in Mondulkiri is intrinsically tied to the loss of indigenous land rights," and "this legal requirement has been undermined and ignored at every level of government for 10 years."¹⁰³ There is a high risk of illegal logging in protected areas.¹⁰⁴

• **There remains a risk of unsustainable and illegal trade in Convention on International Trade in Endangered Species (CITES)-listed species.**

The logging and export of luxury timber and luxury timber products is illegal. Luxury timbers include, but are not limited to, species such as Siamese rosewoods (*Dalbergia cochinchinensis* and *Dalbergia oliveri*); reach kol/royal tree (*Gluta laccifera* – syn *Melanorrhoea laccifera*); thnong (*Pterocarpus macrocarpus*); and beng (*Afzelia xylocarpa*). Siamese rosewood

(*Dalbergia cochinchinensis*) was also included in Appendix II of CITES in 2013, with all other species of *Dalbergia* included in 2016.¹⁰⁵ This means that there are strict trade controls on exports of the timber. Under CITES Appendix II, species cannot be exported from range state producer countries without CITES export permits issued by relevant management authorities following the verification of legal acquisition of the species, with these being issued, in turn, on the basis of scientific authorities' confirmation that such trade will not be detrimental to the survival of the species. Range states are also obliged to pre-notify the CITES Secretariat regarding voluntarily set quotas for harvest and trade before any CITES export permits can be issued.⁹ Cambodia has not currently set a quota for any CITES-listed plant species.

Siamese rosewood is endemic to the Greater Mekong Subregion and is mainly exported to the Chinese market for the production of "hongmu" luxury furniture.¹⁰⁶ Commercial plantations as well as conservation stands have been established in Cambodia but currently no mature plantations of the species exist, which means that all logging occurs in natural forests, despite being prohibited. The illegal logging and trade in *Dalbergia* is a multi-million pound criminal activity.¹⁰⁷ The future of the species is threatened, as there are few remaining stands of *Dalbergia cochinchinensis* to maintain the genetic pool. Two have been identified: 500 mature trees in Kampong Speu in Southwest Cambodia and more than 1,000 trees in Sre Noy in Central Cambodia.

- **Enforcement is weak and hampered by corruption.**

The Forest Administration is responsible for enforcement of forest laws and has judicial powers of investigation. Sanctions include fines of up to 100,000,000 Riels (approx. \$25,000) and sentences of up to ten years in prison for illegal logging and trade. However, forest stakeholders rated law enforcement as "failing" due to ineffective sanctions, ill-equipped staff, and lack of commitment to pursuing cases.¹⁰⁸ Corruption and bribery have been widely reported which sustains remotely located police, border guards, park rangers, and forestry officials.¹⁰⁹

NGO reports and investigations have found repeated evidence of corruption tied to enforcement. For example, the Environmental Investigation Agency (EIA) found that between November 2016 and March 2017, approximately \$13 million dollars in bribes were paid to local authorities. Law enforcement is used to intimidate and silence civil society organizations and environmental defenders.¹¹⁰ Svay Song, a member of the PLCN in Kratie province, said, "the perpetrators [of forest crimes] are only afraid of the Prey Lang people, the Prey Lang Community Network. They are not afraid of the authorities".¹¹¹ Environmental defenders often risk their lives to protect Cambodia's forests. In May 2012, Chut Wutty, one of Prey Lang's most prominent environmental defenders, was shot dead by military police working with a company while he sought to uncover forest crimes in the Koh Kong province.¹¹² On 13 March 2020, another well-known environmental defender, Ouch Leng, was arrested and detained along with PLCN members Srey Thei and Khem Soky and forest investigator Man Mat while investigating allegations of illegal logging in Prey Lang. The four were detained and Man Mat was reportedly beaten by Think Biotech staff and later transferred to police custody at Sambor District Police Station, where they were released without charge on 16 March following days of community protests against the arrests in Kratie.¹¹³

In January 2016, the government set up what later became known as the National Committee for Forest Crime Prevention (NCPAFC). Originally known as the Coalition Committee for Forest Crime Prevention its formation was followed by a spurt of law-enforcement activity against businesspeople suspected of illegal logging, but these actions were reportedly cosmetic. There have been criticisms that the NCPAFC is hesitant to act on some occasions, including by not seizing large consignments of timber.¹¹⁴ In response, the government has released seizure statistics suggesting that it has been active in combatting illegal logging and has auctioned off its seizures.¹¹⁵ Various media reports show that the NCPAFC is attempting to tackle logging at source by targeting individuals who engage in the actual cutting and transportation of timber, and these efforts have been acknowledged by forestry activists. However, activists say that the NCPAFC tends not to investigate wealthier investors who arrange for the export of logs to Vietnam and are often politically influential. In 2019, the committee arrested three mid-ranking government officials, two from the Forestry Administration and one from the Environment Department of Mondulkiri province, for tolerating illegal logging.¹¹⁶

In May 2021, Hong Kong customs reported that it had seized 211 metric tons of "logs from an endangered tree species," with an estimated market value of \$142,000, from Cambodia over a period of one week. The Ministry of Agriculture, Forestry, and Fisheries has denied that it allowed these species to be exported from Koh Kong province. While Ministry officials have promised an investigation into these illegal exports, additional details and a timeline on the investigation have been reportedly withheld or not made public.^{117,118}

The EU Forest Law Enforcement, Governance and Trade (FLEGT) action plan and the UN Programme on Reducing Emissions from Deforestation and Forest Degradation (REDD+) aim to improve Cambodia's forest governance. The Secretary of State of the Ministry of Agriculture Forestry and Fisheries said that MAFF and the FAO-EU FLEGT program have strengthened the capacity of forestry officials in implementing forest laws.¹¹⁹

- **Historically, there has been a risk of illegal cross-border trade to Vietnam, but this has reportedly declined in recent years.**

Large-scale smuggling of illegal timber from Cambodia into Vietnam has been documented on numerous occasions. In 2018, EIA identified three main areas within Cambodia where substantial illegal logging operations were underway and tracked the timber from these sites into Vietnam, both through an official border crossing at Hoa Lu in Binh Phước province and in Le Thanh in Gia Lai province, and where it was smuggled out of Cambodia and into Vietnam across informal crossings near both Hoa Lu and Le Thanh.¹²⁰

Vietnamese imports from Cambodia have dropped significantly since peaking in 2017, when Vietnam reported over 400,000 cubic meters of logs and sawnwood imported from Cambodia.¹²¹ In 2020, these imports had dropped to under 30,000 m³, and data from the first five months of 2021 show similarly low levels, mostly comprised of sawnwood with negligible log imports.¹²² Timber export permits from Cambodia largely use the standard phrase "sawn timber under 25 cm width" or "plywood/veneer;" however, container inspections in Phnom Penh have found square logs and round logs, often of high-value and protected tree species, in containers with these labels. Vietnam started implementing mandatory measures in late 2020 designed to block illegal timber imports as part of efforts to develop a Timber Legality Assurance System under the auspices of the Vietnam-EU Forest Law Enforcement Governance and Trade Voluntary Partnership Agreement. However, Vietnam's devolution of power to provincial governments has reduced the central government's ability to enforce cross-border trade, while corruption on both sides of the Vietnam-Cambodia border has meant that some illicit cross border trade continues.¹²³

REPORTS & ADDITIONAL RESOURCES

A list of relevant reports and additional online tools to complement this country report are also available at the IDAT Risk website: <https://www.forest-trends.org/fptf-idat-home/>

Key Reading:

- Preferred by Nature. 2020. "Cambodia Timber Risk Profile." Preferred by Nature. <https://preferredbynature.org/sourcinghub/timber/timber-cambodia>
- Global Initiative against Transnational Organized Crime. 2021. "Forest Crimes in Cambodia. Rings of Illegality in Prey Lang Wildlife Sanctuary." GI-TOC. [Forest-crimes-in-Cambodia-Rings-of-illegality-in-Prey-Lang-Wildlife-Sanctuary-GITOC-2021.pdf](https://www.globalinitiative.net/docs/2021/forest-crimes-in-cambodia-rings-of-illegality-in-prey-lang-wildlife-sanctuary/) (globalinitiative.net)
- Forest Trends. 2019. "Despite national ban, the Cambodian exports of timber into Vietnam continues – Propelled by Provincial Authorities." Forest Trends, 21 October. Forest Trends – Press Release
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- Hayward Daniel and Jean-Cristophe Diepart. 2021. "Deforestation in Cambodia: A story of land concessions, migration and resource exploitation." Landportal. <https://landportal.org/node/100575>
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- ^a Risk scores reflect Preferred by Nature's Timber Risk Assessment which measures the risk of illegality occurring in 21 areas of law relevant to timber legality, as well as Forest Trends' national governance scores which provides an average relative governance and corruption risk score for 211 countries globally. Preferred by Nature's scores have been flipped to ensure compatibility with Forest Trends' national governance scores, where higher scores are associated with greater governance and corruption challenges. An average of both the Preferred by Nature and Forest Trends scores has been calculated for 66 countries where both are available as of 2021. For all other countries, the risk score reflects Forest Trends' national governance scores. Countries scoring less than 25 are considered "Lower Risk," countries scoring between 25 and 50 are "Medium Risk" and countries scoring above 50 are "Higher Risk." It is important to note that it is possible to source illegal wood from a well-governed, "Lower Risk" state and it is also possible to source legal wood from a "Higher Risk" country. As such, the risk scores can only give an indication of the likely level of illegal logging in a country and ultimately speaks to the risk that corruption and poor governance undermines rule of law in the forest sector.
- ^b The term "forest products" is used to refer to timber products (including furniture) plus pulp and paper. It covers products classified in the Combined Nomenclature under Chapters 44, 47, 48 and furniture products under Chapter 94. While the term "forest products" is often used more broadly to cover non-timber and non-wood products such as mushrooms, botanicals, and wildlife, "forest products" is used to refer to timber products plus pulp and paper in this dashboard.
- ^c Except where otherwise specified, for all trade statistics and charts, data on Cambodia's trade with China is sourced from the General Administration of Customs, P.R. China, compiled and analyzed by Forest Trends. All other data comes from UN Comtrade, compiled and analyzed by Forest Trends. In most cases, all data have been sourced from globally reported trade data with Cambodia as reported by all other countries to UN Comtrade.
- ^d Regulated markets reflect countries and jurisdictions that have developed operational measures to restrict the import of illegal timber. As of 2021, this included the U.S., Member States of the European Union (as well as the United Kingdom, Iceland, Liechtenstein, Norway and Switzerland), Australia, Canada, Colombia, Indonesia, Japan, Malaysia, South Korea and Vietnam. Some measures are more comprehensive in scope, implementation, and enforcement than others.
- ^e Experts believe this ban was only applicable to logs and rough timber sourced from natural forests.
- ^f The geographic coverage of Cambodia's 2006 ban isn't entirely clear. Article 2 states that "all kinds of processed and non-processed timber products deriving from man-made forest" are allowed for export, while Article 3 states that "Logs whether debarked or not; Crude or rough sawn timber; Squared logs with a thickness or width of more than 25cm, even when smoothed; Oil extracted from MOREAH PROEUV (*Dyosilum Lorreiri*), yellow vine, and yellow vine powder; [and] Firewood and charcoal from natural forests" are prohibited from export. The phrasing of Article 3 could suggest that all logs, sawn timber, squared logs, etc. are prohibited from export, and that the natural forest restriction only applies to firewood and charcoal. However, considering Article 2 legalizes all timber exports from plantations, it seems likely that the geographic restriction applies to all of the products listed in Article 3. This is also the interpretation of Preferred by Nature.
See Preferred by Nature, Timber Risk Assessment, 2020
- ^g Cambodia's General Department of Customs and Excise has published a list of items prohibited or restricted from export since at least 2007, with the most recent iteration being published in February 2020. This list does not bar or otherwise restrict the export of logs, sawnwood or any timber product – other than requiring the obtainment of certain licenses. It is unclear if this Customs legislation supersedes and/or nullifies Cambodia's 2006 legislation restricting the export of timber from natural forests. However, several organizations consider the 2006 restrictions to remain in force, including FAOLEX, the WTO, Preferred by Nature, and the Forest Legality Initiative. It therefore seems likely that while Cambodia does not restrict the export of timber from natural forests in its Customs legislation, the 2006 legislation discussed above remains in force.
See WTO, 2017; FAO, FAOLEX, 2021; Preferred by Nature, Timber Risk Assessment, 2020; and FLI, 2016.
For the 2007 list, see Government of Cambodia, Sub-decree No. 209/ANK/BK, 2007.
For the 2020 list, see Government of Cambodia, Sub-decree No. 17/ANK/BK, 2020.
- ^h Articles 61 and 62 of Cambodia's 2008 Law on Protected Areas prohibits the harvest and exploitation of species deemed "rare, vulnerable and critically endangered" and those deemed "luxurious quality hardwood and black wood."
See Government of Cambodia, 2006 Sub-Decree (No. 131) on Timber and Non-Timber Forest Products.

- ⁱ Article 49 of Cambodia's 2002 Forestry Law prohibits exports and imports of "rare and endangered wildlife species", with the following exceptions: 1) for educational or scientific research; 2) in support of a Captive Breeding Program; or 3) to exchange wildlife species pursuant to international cooperation agreements.
- ^j Article 29 of Cambodia's 2002 Forestry Law protects "trees tapped for resin collection" from harvest. This can refer to a number of species, largely of the *Dipterocarpus* genus. The purpose of this protection is to support livelihoods of local communities, namely indigenous communities, for whom resin sale is a traditional occupation.
- ^k All references to "EU + EFTA" signify the 27 Member States of the European Union (as of 2021), as well as the United Kingdom, Iceland, Liechtenstein, Norway and Switzerland.
- ^l In July 2018, the United States announced that tariffs would be imposed on Chinese imports, including a 10 percent tariff on furniture and related goods from China. This had a dramatic impact on the volume of U.S. imports of furniture and plywood (among other forest products) direct from China in 2019. As a result, the U.S. reported increased imports of certain wood furniture and plywood products from other countries in Asia, leading to the U.S. Customs and Border Protection initiating a number of formal investigations under Title IV, Section 421 of the Trade Facilitation and Trade Enforcement Act of 2015. This included CBP investigating whether U.S. importers from Cambodia have evaded antidumping duty order A-570-051 and countervailing duty order C-570-052 on certain hardwood plywood products from China. In February 2020, the U.S. and China reached an agreement on a new set of tariffs.
- ^m Preferred by Nature summarizes forest management and official sources of timber coming from production forest areas (Forest Law, 2002), whereas the protected areas are strictly protected, although commercial activity is permitted in the Sustainable Use Zones of protected areas, defined as zones of high value in national economic development that directly serves the purpose of management and conservation of the protected area and contributes to promoting standard of living (Law on Protected Areas, 2008, Article 11). Other sources of timber are Economic Land Concessions (ELCs) and hydro-power development areas. The ELC and hydro-power areas may be located within either production forests or protected areas or both; and are designated for conversion of forest to other land uses.
- ⁿ As of 2020, Mongabay reported that Lu was still Chair of Think Biotech and the CTIA, as well as Angkor Plywood. See "Cambodian firm accused of creating a *monopoly in the timber business*" by Keeton-Olsen, 2020.
- ^o For Siamese rosewood, these export obligations apply to Thailand, Lao People's Democratic Republic, Cambodia and Vietnam – all of which have experienced rampant illegal exports in recent years.

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The Dashboards have been compiled from publicly available information sources to support risk assessments on the legality of timber products entering international supply chains. The Dashboards are for educational and informational purposes only. The Dashboards have been drafted with input from the Environmental Investigation Agency (EIA) and are subject to external peer review. The Dashboards will be updated periodically based on newly available information.

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