

## **Comments on RSSN (Forestry Reforms)**

RE: Proposed draft for Rural Sector Strategy and its linkages with forestry.

We have read the strategy and thank you for the opportunity to comment.

We feel compelled to forward our comments as we consider that the RSSN does not give due recognition to developments and needs for sustainable development. In particular, it is incomprehensible that the RSSN seems not to build on the knowledge gained and recommendations drawn from the Independent Forest Sector Review (IFSR) which dealt with many of the livelihood – forestry issues.

The RSSN contains nothing on rationalisation and classification of forest areas, or forest partnerships, which were main recommendations of the IFSR. It highlights a contracted view in its Matrix of Recommended Priority Actions, and focuses on continued forest concession management. Conservation is not included.

### Matrix of Recommended Priority Actions

- The processing industry focus is only on wood and not given the high values of some NTFPs sufficient attention.
- Why is there nothing included related to conservation, given MDG7: Ensure environmental sustainability?
- Given the recommendation that ‘Cambodia may be better placed as a producer of luxury timber’ (Paragraph 65) we cannot understand why forest gene conservation is not identified as a priority action – it is crucial that this is added to give credibility to this recommendation.
- Why is the focus on FA so limited, given their new comprehensive roles and responsibilities within the new decentralised structure and mandate over the forest area?

### Forest Encroachment/Conversion

Paragraph 53 states that ‘Numerous encroachments by farmers, often following illegal logging, are in the aggregate the most substantial threat to the forest resource’, and continues to note that economic concessions may also cause conversion. Such a sweeping, and dangerous, statement requires substantiation, as the 3 issues may have very different impacts on the forest given the sizes, types and values of areas under comparison.

### Forest Concession Management

Paragraph 58 recommends focus of the Forestry Administration on the concession area and limited other areas, even though the same paragraph describes such areas as relatively small. At the same time, recognition is given to the lack of adequate plans for most forested land, but why are there no recommendations for these areas, and why are the wider obligations of the Forestry Administration not considered in this respect?

### Forest Gene Conservation and Tree Planting

‘Cambodia may be better placed as a producer of luxury timber’ (Paragraph 65). The erosion of genetic resources of endangered and high value tree species is documented (FA/CTSP/Danida) and it is evident, that the potential for luxury timber production is deteriorating. It would be appropriate for forest gene conservation, and tree planting to be included in the priority matrix.

### Extensification of Agriculture

This is endorsed within the RSSN (Paragraph 5), whereas IFSR clearly recommends this as a last resort only after all other options (including intensification) are thoroughly examined.

### Closing remarks

This report appears to be endorsing the continuation of a forest management system that has been proven to fail in its contributions to poverty alleviation, environmental protection and socio-economic development.

Given the fact that the IFSR was commissioned by a donor group, including the WB, as a major step in the development of a national forest programme, our concern is that its recommendations appear to have had little influence in guiding the preparation of the Rural Sector Strategy Note.

Globally, governments, donors and researchers are realising the potential of forest resources well beyond the direct financial value of their timber resources, especially in meeting livelihood needs, their social and environmental values. It is surprising that the draft report overlooks such contributions.

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