

Think Biotech Cambodia, Co. ltd.

FICTION AND FOREST LOSS IN CAMBODIA

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Executive Summary

The Think Biotech Cambodia Co, Ltd. entered into a public-private partnership in 2010 with the Forest Administration (FA) of the Ministry of Agriculture, Forestry, and Fisheries (MAFF). The objective was to pursue an Afforestation/Reforestation (A/F) project as part of a five location forest-based climate change MOU between the Korean Forestry Service and the Cambodian FA. Research shows this company has broken Cambodian law, ignored international standards for responsible business practice, and is not adhering to its own project commitments.

In 2012, the company was given permission to begin preliminary operations and contracted the CES company, Ltd. to conduct an Environmental Impact Assessment (EIA). The results of this EIA stated that there would be dramatic impacts from this company, especially social impacts. Despite this, MAFF issued permission for the company to begin clearing land, which the company did—with the full knowledge that their activities would have unacceptable impacts.

There was no prior consent requested of the community and the land cleared by the company was locally productive with rice fields, shifting cultivation, cash crops, and resin harvesting. The company cleared over 2,000 hectares of local land, as well as spirit forests and grave yards. After community protests, inadequate compensation of returned land was obtained for 170 families and 1,700 hectares were

conceded to the community by the company. Company boundary markers remain on this land and for a time people could not build houses there.

Company documents state that the project will grow diverse tree species in degraded forest. The forest does not fit any internationally accepted definition of degraded forest, and only acacia are visible in the cleared and replanted area of the plantation. They are taking down natural forest and replacing it with monocrop tree plantation.

Basic guidelines and regulations have also been ignored. The company was supposed to adhere to a strictly regulated clearing procedure of clearing 2000 hectares per year, this was not followed. The company cleared beyond this amount and has further selectively logged high quality timber in the area. Additionally, they did not follow the requirement of leaving 50 meters of forest on either side of streams and cleared right up to the water's edge. Fish populations have plummeted and the streams are now dry in the dry season.

The company promised roads, infrastructure, and jobs. The village roads remain in very poor condition and the only road built by the company is for their own transport through the deep forest to the ferry. There is increased illegal logging along this newly build road. There are no new schools or health centers and at its peak employment locals report about 700 local workers. Since February 2016 they began laying off workers and now employ approximately 300 migrant workers planting saplings.

RECOMMENDATIONS

- No more natural forest should be cleared for this project.
- The company's sawmill should be dismantled and removed from the area.
- The company forfeits the Acacia plantation planted thus far as compensation for community losses.
- The rest of the forest area could be used as a REDD+ project area to continue cooperation between the Korean Forest Service and Cambodia's Forest Administration.
- The company's road into the deep forest should be closed.
- The parent company, Hanwha Corporation, should compensate the local community for its participation in forest crimes by setting up a \$100,000 trust to the PLCN for forest patrols, to support their efforts at natural resource and biodiversity protection.
- The Think Biotech company should execute their A/R project in an area in need of reforestation, like the Sandan district of Kampong Thom.
- One social land concession (SLC) has already been cleared in this area and many local citizens are engaged in cash cropping, mostly cassava. These farmers, the coming inhabitants of the SLC and the existing farmers, could be subsidized while growing Acacia crops for Think Biotech.
- This tree cover could also enhance the Korea-Cambodia Tumring REDD+ project in that area.

Introducing Think Biotech Cambodia Co, Ltd.

The Think Biotech Cambodia Co, Ltd. is currently operating an Afforestation/Reforestation (A/R) project that straddles the boundaries of Kratie and Steung Treng provinces. The project site covers 34,007 ha of land at the eastern edge of the Prey Lang forest along the Mekong River. Although the company director says



Figure a: Young acacia plantation in front of natural forest.

this is a commercial plantation business,¹ the project documents explicitly state its function to “to restore the forest through re-forestation activities” (MAFF 2010, article 2). Physical evidence from the project site suggests that this project is an economic forest plantation that is converting natural forest to industrial tree plantation.

Think Biotech is a subsidiary of Hanwha Corporation, a company that deals in explosives, defense,

trade, machinery, and chemicals. Hanwha is one of South Korea’s largest Chaebol, a Korean term that describes a multi-national conglomerate run by a single family. Chaebol are protected from competition, provided low-cost loans and encouraged to expand into new, strategic industries. These companies built the South Korean economy in less than a generation (Marlow 2015). Hanwha was founded in 1952 as Korea Explosives.

There is no history of the Think Biotech company before the initiative with Cambodia’s FA, but the company’s director claims 10 years of forestry experience in the Solomon Islands.² This location, at the most remote edge of Prey Lang where there is no infrastructure, was chosen by the company for its rich soil fed by the nutrients and water of the Mekong River. Ironically it is these conditions of isolation and lack of infrastructure that have kept the forest here intact.

Cambodia’s forests are in need of restoration and many are in a dismal state, but the Think Biotech forest restoration project is not in one of those locations. Is no longer primary forest, in the 1990s the project area was heavily logged by timber concessions and illegal logging continues to affect the area, but much of the area

¹ Interview, Chun Hwanki, Think Biotech company, 1 November 2016.

² Ibid.

remains a dense, biodiverse landscape that sustains the livelihoods of local communities.

This report is the result of recent research into the Think Biotech Cambodia Co, ltd. and will include a brief discussion of the history of forest exploitation in Cambodia as it relates to this case, followed by a specific discussion of Think Biotech that provides evidence for the points raised above. In conclusion, The report will discuss the national and global implications of rapid land conversion and forest loss as this relates to our recommendations.

Brief history of the Cambodian Forest

The extraction of luxury timber from Cambodia began in the pre-angkorean era (Diepart and Dupuis 2014, 451), increased during the French protectorate, and persists into the present moment. After the Khmer Rouge ouster, forests helped to fund civil war factions fighting the Vietnamese-installed government (Le Billon 2000). By the time of the 1993 UNTAC elections, the logging sector was dominated by warlords, and thousands of Cambodians engaged in freelance logging in the lawless environment of the emerging economy (Le Billon and Springer 2007). In the 1990s, international donors promoted forest exploitation to provide revenue for the Cambodian government (World Bank, UNDP, and FAO 1996).

International companies and a few prominent Cambodian politicians were awarded forest concessions, and the actual cutting and hauling was organized by high-ranking military and government personnel (Davis 2005). The 2001 land law suspended all logging concessions and drafted the criteria under which ELCs could replace them (RGC 2000, 2001, 2005). Many ELC were awarded in densely forested areas and the land conversion is far more destructive than the selective cutting of the anarchist forest concessions. Further, the saw mills inside the ELC drive continued forest extraction outside concession boundaries (Forest Trends 2015). This fuels a massive free-lance logging economy in which most local people are embroiled across the country.

Think Biotech is not technically an ELC, but the social and ecological impact of their forest conversion activities is consistent ELC activities throughout the country (LICADHO 2009; Neef, Touch, and Chiengthong 2013) and also inside what was the Prey Lang forest boundary (Dararath, Top, and Lic 2011; Michaud 2013). Our research corroborates the work of others that document a lack of community consultations, no environmental impact assessments, bulldozed fields, plantations, and forests, as well as cleared spirit forests and graveyards without

concern and have left many communities without livelihoods. They say they bring jobs to places where there are none. What they do is bring jobs to places that did not need them; to places where the forest provided sustainable livelihoods. They also fold continued forest exploitation into the value chain of global economics. The Think Biotech A/R project has done all of these things this under the cover of a climate based MOU that also attempts to claim climate mitigating forest restoration and carbon storage.

Methodology

This data collection began in January 2015 and research is ongoing. We conducted group discussions with affected communities, open and closed interviews with local activists and local officials, and traveled extensively around the area of the plantation. We receive regular communications from trained citizen researchers about company activities, forest crimes, and affected communities. We also conducted interviews with company representatives, FA staff, and the staff at the EIA company, CES. In addition to this engaged fieldwork, we investigated the company through government documents, online research, and also shared and compared our findings with those of other scholars working in the area.

Think Biotech on Paper

Think Biotech Company, Ltd. is introduced in a 'Formal Request Letter' from the Forest Administration (FA) to the Ministry of Agriculture, Forestry, and Fisheries (MAFF), dated June 16, 2010. In this letter, Think Biotech is described as a "current company that has technology in developing forest resources in the tropical regions in Korea. The company also has experience in forest plantations in Southeast Asia and South Pacific regions" (FA 2010). Research into the Think Biotech company reveals no evidence of activities or forestry initiatives anywhere before starting operations with the FA in Cambodia. Think Biotech does not appear in Hanwha Corporation reports prior to the 2011 financial reports (PWC 2011).

In the letter from the FA to MAFF, the company commits to investing 89 million USD over 25 years into their operation, to pay royalties to the state, and to divide the profits from wood products with the FA, MAFF, and the Ministry of Economics and Finance. They promise a 2000-person labor force and help with meeting Cambodia's Millennium Development Goals of 60% forest cover by, "converting degraded forest into land full of timber resources" (FA 2010).

On December 22, 2010, MAFF signed a Prakas (ministerial law) to instigate this project. On December 31, 2010, Think Biotech Cambodia Co, ltd. was not listed as a subsidiary on Hanwha's financial statements, but by 2011 they were added (PWC 2010, 2011). The Prakas signed by MAFF literally created Think Biotech. Once created, they found someone with forestry experience to bid on the MOU contract and started operations in 2012.³ The initial claims to forestry experience for Think Biotech and Hanwah corporation appear to be false and a massive swath of Cambodia's forest has been awarded to a Korean conglomerate specializing in explosives as part of an MOU addressing climate change in tropical areas.⁴

The Prakas issued by MAFF makes a number of relevant claims (MAFF 2010). First, that this project is designed to “stop slash and burn activities and illegal claims of trees”, both of which are traditional indigenous subsistence practices of shifting cultivation and resin tapping, protected in articles 25 and 26 of Cambodia's Land Law (RGC 2001) and by Article 40 of the Forestry Law (RGC 2002). The Prakas suggests that this forest rehabilitation project will “improve soil fertility through reforestation and biodiversity conservation and reduce the utilization of natural forest by increasing the productivity of artificial forests”. Additionally, it can be part of Clean Development Mechanisms and can “contribute to the reduction of greenhouse gas emissions and climate change mitigation”.

These claims do not hold up to scrutiny and Think Biotech is both according to its director and its implementation a corporate grab of forest land for industrial production.

Think Biotech on the Ground

The company started clearing-cutting the not-degraded forests and swidden areas outside the village of Achen in Kratie Province in 2012, despite the environmental justification of the 2010 Prakas (Group Discussion, Achen, Feb. 13, 2015). Think Biotech was issued an MoE contract for CES CO., ltd. to do an Environmental Impact Assessment (EIA) on Dec. 25, 2012, stating that the EIA must be completed by Feb. 27, 2013. This EIA was completed and reported serious impacts from this company, especially social impacts. It was sent to both the company and the Ministry of Environment, who decided they needed to get more details about this

³ Interview, Chung Hwanki Think Biotech company, 1 November 2016.

⁴ The details of this MOU have yet to be excavated.

project.⁵ Despite this, on 4 June 2013, MAFF approved a request for the company to begin clearing the first two sections of their project site, 2,742 hectares.

Hundreds of families were known by the company to have active rice and crop land, as well as shifting agricultural land and nearby forests that included resin trees,⁶ protected under Cambodian Forest Law (RGC 2002). Nonetheless, the company cleared and claimed their holdings, including spirit forests and burial grounds. Both livelihoods and culture have been devastated.

The company's forest rehabilitation initiatives include clear cutting the natural forest and replacing it with acacia plantation. There some scattered teakwood trees and also some eucalyptus, but acacia is the dominant species. This goes against the company's proposed activities, which states they will grow foreign and native species at a rate of five to one, with 22,000 hectares devoted to acacia and eucalyptus and 4,000 hectares of native hardwoods. Neither the company director nor the EIA company could answer how this ratio was reflected in the current plantation distribution.



Figure 1: O Sra Lork Stream inside Think Biotech concession.
Photo taken by Seachy Monirath, 7 September 2016

In addition to destroying community land and resource holdings, company practices impact the environment and cause climate change effects in the area. Against Cambodian environmental guidelines to keep 50 meters of forest on either side of natural streams, land was cleared right up to the banks. The combined effects of clear-cutting and selective cutting in the deep forest

have created powerful localized climate change effects. Many of these streams have not been dry in local memory, now the heat also kills fish eggs (IVI Som No, 2016).

⁵ Interview, SOK Sothea, CES company, 8 November 2016.

⁶ Interview, Chung Hwanki Think Biotech company, 1 November 2016.

The forest currently being cut is not degraded forest, as suggested by the FA letter in 2010 and by the company's managing director and chief executive, who stated in 2016 that the land has only 30m³ of timber per hectare (Turton and Phak 2016). Our research reveals dense forest over much of the concession, with many areas of affected forests, but no actual degraded forests.⁷ There are four recognized community forests inside the concession boundaries, that have been purposefully maintained. Beyond those, in areas just beyond company clear-cutting, we found standing trees equaling 30m³ in an area less than 30m²; one hectare is 100m². In the northern areas of this concession yet to be cleared, there remains dense forest. It does not compare to the Cambodian forests before the timber concessions, but this is vital forest with dense canopy—re-growing on its own.



Figure 2: Resin forest, Siembok District, Steung Treng (lat 13.125156; lon 105.890884). Photo courtesy of Yin Sothea.

The area where the geo-tagged photographs in figure 4 were taken is in the most remote, northwestern corner of the Think Biotech project, where in August 2016 Think Biotech, FA, and Cadastral authorities measured and marked company boundaries. These photographs are part of a collection of data created by affected communities who have mapped over 1,000 hectares of working resin forests inside the project boundaries. They have mapped their claims in an effort to make their livelihoods visible to the company and the government and to maintain their high standard of living.

People who have been dispossessed of their resin trees and their livelihoods report borrowing money to start growing cashews and cassava for the market, which does not provide an adequate yield of cash and drives land conversion (Mahanty and Milne 2016). They also work on the plantation. The company has employed up to

⁷ UNEP/CBD, 2001: A degraded forest is a secondary forest that has lost, through human activities, the structure, function, species composition or productivity normally associated with a natural forest type expected on that site. Hence, a degraded forest delivers a reduced supply of goods and services from the given site and maintains only limited biological diversity. Biological diversity of degraded forests includes many non-tree components, which may dominate in the under-canopy vegetation. FAO, 2003: the long-term reduction of the overall potential supply of benefits from the forest, which includes carbon, wood, biodiversity and other goods and services.

1,000 people (Turton and Phak 2016), and their wages at \$150 - \$200 a month are well below the \$300 a month that resin tappers report in the off season from their trees (GD Steung Treng, Dec 13, 2015; see also Jiao, Smith-Hall, and Theilade 2015). Promises made by the company about forest rehabilitation and community jobs do not hold up in practice. The area's original residents are more poor than they were before the Think Biotech project.

It is not just in clear-cutting natural forest for plantation activities and providing sub-standard jobs that Think Biotech abuses the codes of their agreement. The company's promise of roads manifests not as new roads for villagers along the riverfront, where most people live, but rather as well-kept canals going deep into the forest. These roads into the forest were planned (figure 3) while protected area status for the region was under negotiation (Work and Thuon n.d.).

Think Biotech out of Bounds

Not only is the concession clear-cutting within its 'forest rehabilitation' project boundaries, they are contracting locals and their own employees for selective cutting of high-grade, long-living trees. Researchers have worked undercover with the loggers, who use company equipment to haul wood cut in the deep forest to the port at the Mekong. Investigators followed the timber truck to the Vietnamese border, where officials were paid a fee to let the truck cross.⁸ Interviewees previously working with the company reported being asked to 'clean' identification numbers off chainsaws, and to hide equipment prior to inspection by the FA. In addition, former employees report taking 'special orders' for luxury timber that was logged both inside and outside the concession .

Despite this evidence, Think Biotech chief director claimed "no control" over illegal loggers who used their roads to enter the forest (Turton and Phak 2016). The extent to which this company is driving continued deforestation and land conversion in the surrounding areas outside the concession boundaries is visible in

⁸ <http://www.chrtf.net/2015/12/27/illegal-logging-and-sawmill-by-hanwha-thinkbiotech-cambodia-co-ltd-in-kratie-of-prey-lang/>

satellite photos from 2016. The plantation grid marks the westernmost edge of the concession boundary.

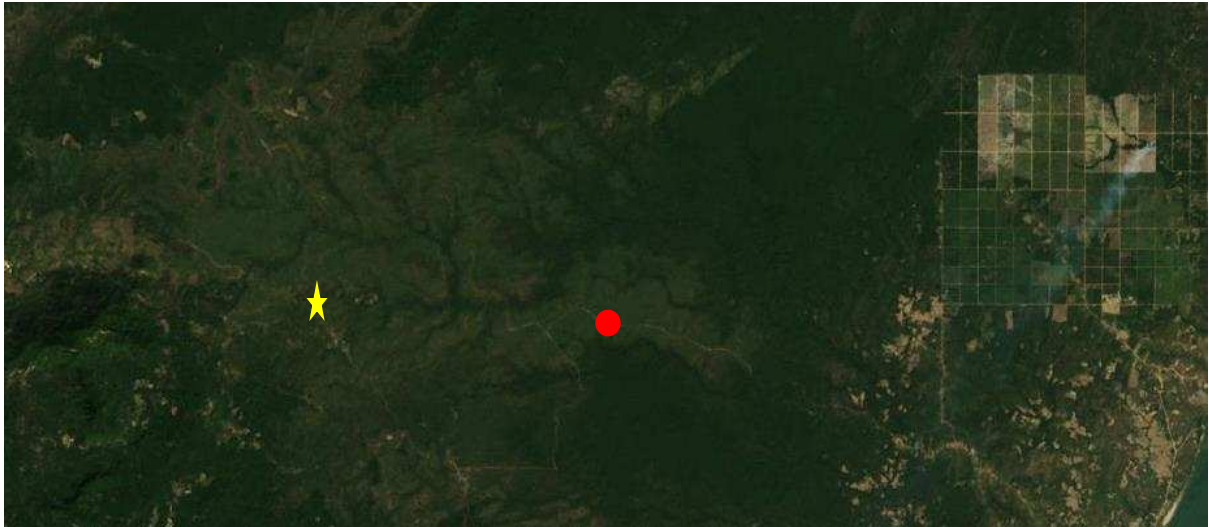


Figure 4: Landsat 8: Jan. 2, 2016: Global Forest Watch
 Yellow marks end of clear company road (lat. 12.975242 log. 105.708575)
 Red marks protected Area boundary (lat. 12.930551; lat. 105.790386)

Our researchers traveled as far as the yellow star on smooth, well-maintained roads that extend beyond both the planned road to export timber to the ferry, and well beyond the protected area boundary.

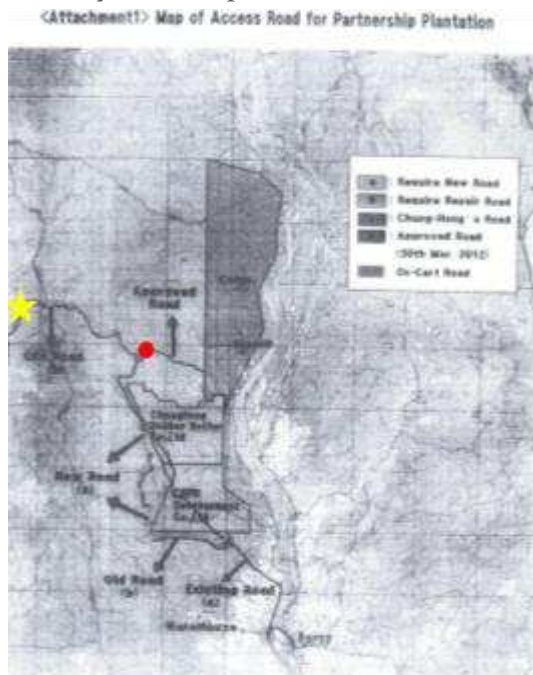


Figure 3: diagram of shared roads and new roads into the forest for Think Biotech and Neighbor Chhun Hong. Yellow and red approximate figure 2.

Along these roads, new communities are currently expanding deep within the forest—some of them lost land to the company, others were cutting cassava plantation land and logging freelance (Community Research, Kratie February 2016).

The planned and approved roads in figure 3 suggest serious duplicity on the part of the FA and MAFF, who were negotiating this protected area with USAID at the time these maps were drawn. Why are company roads planned deep into the forest? The complicity and corruption in the Cambodian government and among international donors is not the topic of

this report (for more on this, see Work and Thuon n.d.; Milne 2015; Cock 2016) but should not go unacknowledged.

Freelance logging employs a large number of recently disenfranchised people and also those with the capital and capacity to join, whether impoverished or not. Much, but not all freelance logging is fueled by company activities. Interviews with previous company employees reveal they were asked to 'clean' identification numbers off chainsaws, and to hide equipment prior to inspection by the FA. In addition, former employees report taking 'special orders' for luxury timber that was logged both inside and outside the concession. Even logging that has nothing to do with company activities is facilitated by company roads—which have no reason to extend into the forest—and is laundered through the legal transport of wood from the area.

Destruction of Sustainable Forest-based Livelihoods

As outlined in the 2010 Prakas, Think Biotech is devaluing subsistence lifestyles and decreasing dependence on “natural forest”. The stated intent was to create an “artificial forest” that would replace the natural forest. In contrast to the natural forest, people cannot live off the acacia plantation. Laborers receive low wages and buy more foods and goods from external markets, they take out loans to develop market plantations, often on new land cut from the forests.

The value of the deep forest changes from a place to gather what you need, to a place that provides ready cash through a variety of exploitative practices. This last is an effect of this company in particular, and of all the companies that monopolize common resources for private profit, at the expense of sustaining our collective landscape.

Effects of Market-based Land Conversion in Cambodia and Globally

ELC have been awarded by both MAFF and MoE in Cambodia's most densely-forested areas (Forest Trends 2015), and there are reports of dispossession, increased poverty, and environmental destruction similar to the evidence presented here from across the country (Neef, Touch, and Chiengthong 2013; Mahanty, Milne, and Bradley 2015; Peeters 2015). To dispel any notion that this is a Cambodia-specific operation and to stem the tide of accusations against the

Cambodian government, mounting evidence situates the Cambodian case studies as reflections of such abuses world-wide (Grajales 2013; Sullivan 2013; Bruce 2015; GW 2015). The International Criminal Court (ICC) recently expanded its mandate to consider large-scale environmental destruction and dispossession as an international crime.⁹

The extent to which global development institutions and law-making instruments facilitates this situation is receiving increased attention (Grandia 2013; Silva-Castañeda 2016). Such studies triangulate with the activities of international conservation organizations, whose mandated ties with governments have them fund and administer programs directly through ministries and local authorities. In Cambodia, such cooperation ensures that active and aggressive land conversion and selective logging in forested areas continues (Milne 2015); and often undermines the efforts of local communities engaged in forest protection efforts (Work and Thuon, n.d).

We are witnessing global forest loss at ever increasing rates. Climate change effects, like temperature rise, violent storms, and unseasonal weather patterns are reported all over the world. Think Biotech has locally accelerated, not mitigated those impacts. We have a universal human right to development (UN 1986) but there is no right to refuse development. The Think Biotech case is a clear example of a land- and timber-grab masquerading as a 'sustainable development' project. It should be stopped.

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⁹ <http://www.harvardilj.org/2016/07/corporate-liability-under-the-rome-statute/>

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