



Ho Chi Minh City July 5th 2018

To: Environmental Investigation Agency (EIA)

On 31 May 2018 the Environmental Investigation Agency published report: *“Serial offender – Vietnam’s continued imports of illegal Cambodian timber”*. After reviewing the report, the Handicraft & Wood Industry Association of Ho Chi Minh city (HAWA), a member of the Forest Legality Alliance, now the Forest Legality Initiative (FLI) has the following comments:

1. We respect the EIA’s objective concerning the investigation and implementation of campaigns against the environmental crimes. We also respect the author’s freedom of speech.
2. On positive side, the report has warned the related parties to reconsider their activities with aim not only for the prevention but also for putting an end to forest crimes. These objectives completely correspond to HAWA’s.

However, we have identified some inaccuracies and/or insufficient arguments in the EIA report. These inaccuracies and insufficient arguments may lead to the misleading and imprecise understanding of readers. In the spirit of freedom of speech, and to contribute to the improvement of the EIA report, we would like to share with you our views and assessments. We hope that you will consider and accept our views and assessments outlined below:

1. Concerning Vietnam wood industry’s position

The HAWA and the Vietnamese wood industry business community in general have clearly expressed our position that in any case we will eliminate illegal timber from supply chains. We have also worked with our members to ensure transparent timber market information is available to public.

2. Concerning the information in the EIA report

- The author chose three hot spots of illegal logging in Cambodia as the study areas, and to use insights derived from these areas to project the country’s illegal timber logging and trading. This projection is not scientifically acceptable as choosing these case studies is not representative-based, and consequently the study is misleading.
- The calculation of timber import quantity from Cambodia into Vietnam is based on the assumption that the illegal logging had been carried out in entire the dry season, from September until next March. It also assumes that the logging has taken place for 30 days/month during the logging period. In reality, no individual or organization can carry out the logging at this

intensify. As a result, the timber volume imported from Cambodia to Vietnam calculated by the author is not accurate.

Clearly, the author has not been aware of enormous effort by the Vietnamese Government in strengthening the control over the import from Cambodia, and in preventing and possible forthcoming ban of the import of Cambodian timber. Such efforts include:

- The Vietnam's Prime Minister has issued the document to ban importing timber via trails, paths, supplementary border gates into Vietnam (*from Laos and Cambodia*).
- The Vietnam's Ministry of Industry & Trade already sent an official letter to the Cambodia's Ministry of Industry and Trade, proposing a close collaboration to control the timber trade between the two countries.

3. Other comments for the EIA report

Failed results derived from incorrect study methods has resulted in misleading and misunderstanding of readership and negatively impacted timber business community with good practices. These businesses are those who are not involved in and have no connection to Cambodian timber.

In addition, the comments of Mr Jago Wadley, the EIA's senior forest campaigner made in the press release issued in London for this report read "*Vietnam has a long history of stealing timber from its neighbours...*". Please be advised that there are a large number of wood processing companies in Vietnam those have no connection with Cambodian timber. Mr. Wadley's comments are fail. They devalue the report and make a different image.

During the course of the research, the author seemly met the illegal traders. If she/he had spent time to meet the manufacturers with export products, representatives from sometimber associations, ... she/he would have different research results. She/he would been able to learn a lot of community's effort concerning those made to exclude illegal timber from supply chains.

We are fully aware of our responsibility to protect the environment, and like EIA as a member of FLI, we would like to provide the EIA with this additional information to ensure the accuracy and sufficient information of the report for public. We're delighted to meet you to discuss the issues raised in the EIA report.

Please publish this letter on your website. Look forward to hear from you.

On behalf of HAWA
Huynh Van Hanh, Vice Chairman.

