Value and bureaucratic violence in the green economy

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A B S T R A C T

The green economy now dominates global environmental governance, but its potentially insidious inner-workings and effects remain poorly understood. To probe this problem, it is necessary to explore how value is created and distributed in the green economy, and how the production processes of new green commodities like carbon credits shape the social and material realities from which they emerge. In this article, we examine how voluntary carbon credits are produced and acquire value through the implementation of REDD+ in voluntary markets, which essentially entails the demonstration of project compliance with a set of techno-bureaucratic standards or rules, known as *validation* and *verification*. Through participant observation of these processes at a REDD+ project site in Cambodia, we reveal how the REDD+ standards give rise to bureaucratic performance and disciplined adherence to an "audit culture" that is both apolitical and indifferent to local realities. The local realities observed in Cambodia entailed profound environmental and social injustices, especially for indigenous communities facing illegal logging and land alienation. While the REDD+ initiative initially engaged these communities in Free Prior and Informed Consent (FPIC) and indigenous communal land titling, the techno-bureaucratic exigencies of the REDD+ standards ultimately curtailed such formal possibilities for local rights and agency. We call this phenomenon bureaucratic violence, as it involves the implementation of mundane technical rules that hide local contestation, sideline criticism and deny justice. Furthermore, we argue that bureaucratic violence is fundamental to the generation of value in the green economy, as a process that works alongside commodification, spectacle, and other forms of structural and material violence.

1. Introduction

> *Bureaucracy is the form of government in which everybody is deprived of political freedom, of the power to act; for the rule by Nobody is not no-rule, and where all are equally powerless we have a tyranny without a tyrant.*
> Hannah Arendt 1969

In this article, we approach the emerging green economy as a system of bureaucratic rule, which has particular and potentially insidious side-effects. Notions of the green economy have proliferated since the 1980s, generally in reference to the use of market or economic policy instruments to solve environmental problems. More specifically, the green economy aims to re-frame our extractive and fossil fuel based economy, using what amounts to "an evaluation system promising improvements and solutions" to environmental harm (Bracking, 2015: 2342). Its chief modality is the transaction of new, marketable products

like carbon credits, ecosystem services, green bonds and biodiversity offsets. Importantly, these products or commodities are virtual, meaning that they are socially constructed and non-tangible (Mahanty et al., 2013; Cavanagh and Benjaminsen, 2014). Furthermore, they have a tenuous, co-productive, and still relatively unmapped relationship with their material and social underpinnings (Bracking, 2015; Asiyanbi, 2017). Given the green economy's ambiguous and virtual nature, its ability to generate enormous value for a wide range of actors is remarkable. Green 'assets' are now estimated to be worth hundreds of billions of dollars[1], and the production of these assets has spawned a technocratic and highly-paid side industry. This phenomenon raises crucial empirical questions, such as: How exactly does value arise in the green economy, and to whom does it accrue? What are the material and social side-effects of the green economy's processes of commodification and value creation?

We approach these questions by focusing on one of the most prominent elements of the green economy: the mechanism of REDD+ or

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[1] Recent, indicative valuations of the green market include: (i) the formal global carbon market estimated to be worth $60 billion in 2016 see https://www.statista.com/statistics/223516/global-carbon-market-value-forecast/; and (ii) the market in green bonds estimated to be worth over $150 billion in 2017 see https://www.investordaily.com.au/analysis/42135-a-decade-of-green-bonds.

Reducing Emissions from Deforestation and forest Degradation (see McAfee, 2014).[2] REDD + is exemplary of the green economy, because it involves extensive technical and bureaucratic work to produce trade-able carbon credits. This work has given rise to a veritable labyrinth of globally applicable rules, technical guidance, certification standards, validation and verification systems, and social safeguards – all of which are implemented to demonstrate to buyers the supposed *reality* and *quality* of the carbon credits on offer. By reality, we refer to the 'permanence' and 'additionality' of the carbon credits: technical concepts used to prove the physical existence of carbon sequestration. By quality, we refer to the credits' supposed social and biodiversity co-benefits or ethical dimensions. For Cavanagh and Benjaminsen, the ability of project proponents to demonstrate both the physical existence and the ethical properties of carbon credits is crucial to overall value creation, as the two work together: consumers acquire a form of "ethical use value", which they argue "greatly enhances the ability of carbon market brokers to generate exchange value by attracting 'green' investors" (2014: 56). Thus, different forms of value are at play in the making of carbon credits, and they appear to interact with each other.

With these distinct aspects of value in mind, we approach REDD + policy implementation as through it were a production process in the "forest carbon commodity chain" (Mahanty et al., 2015). This perspective reveals how forest carbon comes into being and acquires value through institutional assemblages and bureaucratic constructs, which together assure buyers that they are purchasing "trusted and fungible"[3] units of nature (Turnhout et al., 2014: 582) – or, carbon credits that actually exist and are ethically sound. For the voluntary carbon market, this aspect of the production process involves *validation* and *verification* exercises. Here, project proponents and auditors demonstrate how a given REDD + project complies with international standards, like the Voluntary Carbon Standard and/or the Climate, Community and Biodiversity Standard. Through our empirical observations, we contend that the work of achieving compliance with these standards is bureaucratic and performative: that is, project proponents rely upon bureaucratic rituals and routines to construct "representational fabrications" (Ball, 2000: 11) of the carbon credits that they sell. Thus, the value of forest carbon derives in part from mundane bureaucratic performance, which operates alongside other observed value-creating mechanisms like spectacle and commodification (Igoe, 2010; Cavanagh and Benjaminsen, 2014; Bracking, 2015, as explained below).

To explore the workings and effects of bureaucratic performance empirically, we examine the case of one REDD + project: a conservation area in northeast Cambodia, managed by the Cambodian Forestry Administration (FA) and the Wildlife Conservation Society (WCS), an international non-government organisation (NGO). Under preparation since 2008, the project has overcome many hurdles in Cambodia to achieve exemplary status as a pilot from which others can learn, both nationally and internationally (Mahanty et al., 2015). In 2016, the project's carbon credits were registered and sold to the Disney Foundation for US$2.6 million,[4] reflecting years of labour, skill and negotiation on the part of the implementing NGO. Our empirical focus spans 2012–2015, when we participated in and observed REDD + project processes in the target area, including the implementation of Free Prior and Informed Consent (FPIC). In this context, our analysis focuses upon the particularities and exigencies of the REDD + international standards

in practice. Ultimately, we observe how the project proponents' contorted efforts to comply with rapidly evolving bureaucratic standards both masked and accentuated underlying structural and material violence in Cambodia. We term this effect 'bureaucratic violence' - a phenomenon that is arguably systemic to the green economy, which helps to theorise recent observations of REDD +'s violent effects, including its blindness to or abetting of local dispossession and rights violations (e.g. Pasgaard, 2015; Sarmiento Barletti and Larson, 2017; Howson, 2018; Milne et al., 2018).

The paper proceeds with an explanation of the relationship between value, performance and bureaucracy in the green economy. We then present our empirical material, first with an explanation of our methods, and second with ethnographic accounts of: (i) how FPIC was implemented in the project site, and (ii) how the validation and verification processes were completed. Our empirical gaze aims to de-fetishize the carbon credit, and the value-adding processes associated with it.

2. Linking value, performance and bureaucracy in the green economy

To understand what drives the green economy, it is necessary to examine how it produces value, and who benefits from this. A plethora of actors is involved here, including multi-lateral institutions, governments, corporations, NGOs, project managers, auditors, validators, donors, communities, forest managers, and consumers. These actors in turn engage in a variety of transactions associated with the green economy, in most cases deriving some form of benefit or value from it. For example, financial benefits are derived from wages, grants, trading and profits; while other benefits include enhanced corporate reputations, increased market and resource access, or moral salve. The point is that the green economy produces a multiplicity of values; and that these values are distributed according to a political economy which appears chiefly to serve the interests of extractive capital (Bracking, 2015; Brand, 2012), often involving violent appropriations of nature referred to as "green grabbing" (Fairhead et al., 2012) or "green violence" (Fletcher, 2018).

This problematic relationship between power and environmental interventions has long been observed. Structurally speaking, scholars point to the synergy between capitalism and the green economy, arguing that its mechanisms provide a "spatial-environmental fix" to the constraints and crises of capitalism (Harvey, 2003); an absolution from the excesses and contradictions of neoliberalism (Büscher et al., 2014; Brand, 2012); and a new frontier for accumulation (Bracking, 2015; Sullivan, 2013; Brockington and Duffy, 2010). On a discursive level, the green economy is argued to have attained hegemonic status in environmental governance, as the culmination of environmentalism's neoliberal transformation, "recasting environmental problems as the result of market failures rather than specific outcomes of market-based ideologies, practices and relations" (Corson et al., 2013: 3, citing McAfee, 1999).

Given these assertions, the inner workings and effects of the green economy demand scholarly attention. Foundational research indicates that, at its core, the green economy involves attempts to commodify nature, to allow for new goods and services to be transacted and for accumulation to occur (Castree, 2010). In practice, this has been achieved through the proliferation of constructs like ecosystem services and carbon credits, which underpin the implementation of new financial mechanisms like REDD + (Robertson, 2012; McAfee, 2014); and the reconfiguration of governance logics and metrics, including the introduction of technical standards, to ensure that "the economy" can come into being (Corson et al., 2013; Milne and Adams, 2012). As noted, these mechanisms lead to the production of "socio-natural commodities" (Peluso, 2012), which are fetishized and abstracted to enable exchange, in a way that disguises the underlying social and material conditions of production (Kosoy and Corbera, 2010; Milne, 2012).

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[2] REDD + is a voluntary climate change mitigation approach, developed by Parties to the UN Framework Convention on Climate Change. It aims to incentivize developing countries to reduce emissions from deforestation and forest degradation, conserve forest carbon stocks, sustainably manage forests and enhance forest carbon stocks. See https://redd.unfccc.int/

[3] The phrase "trusted and fungible" comes from the Verified Carbon Standard (VCS) Program Guide, 2017: (http://verra.org/wp-content/uploads/2018/03/VCS_Program_Guide_v3.7.pdf).

[4] Phak, S. and Kotoski, K. Disney buys up carbon credits in Mondulkiri. Phnom Penh Post, 25th July 2016.

This process of commodity fetishisation is a key way in which the green economy's products acquire value,[5] but there are other mechanisms at play too. This is clear in the case of carbon credits, which acquire value from *a sense* that what is being transacted is real and meaningful, since the commodity itself is virtual (Cavanagh and Benjaminsen, 2014; Neimark et al., 2016). This has led researchers to suggest that value is "co-produced" through the interaction of different mechanisms in addition to commodification, including "performativity" and "spectacle" (Bracking, 2015; Cavanagh and Benjaminsen, 2014; Igoe, 2010). These extra mechanisms create value through emotional, visual, calculative and persuasive practices – all of which contribute to the functioning of the green economy.

Spectacle, or the consumption of images and their associated ideals (Debord, 1967; Tsing, 2000, 2005), plays an important role in value creation for the green economy. Igoe (2010), for instance, shows how conservation NGOs in Africa use emotive imagery of landscapes and indigenous people to engage potential consumers, effectively selling idealised human-environment connections. In other words, relationships between people and nature are "spectacularized" through a "proliferating smorgasbord of images and media" (2010: 375). Crucially, the socially constructed quality of the images is disguised, along with the messy and often violent socio-political relations involved in the process of conservation itself – leading to what Igoe refers to as a "double act" of fetishisation (after Richey and Ponte, 2008). This involves "the masking of social relations of production combined with the commoditization of the knowledge about the commodity itself" (Richey and Ponte, 2008: 723). In the context of REDD+, we suggest that this occurs in the fetishisation of a carbon credit's ethical qualities, signalled through compliance with voluntary standards like CCB, which go over and above what is required for basic carbon market registration and exchange (VCS, 2017d) – a notion that resonates with the distinct values generated by a carbon credit's quality and reality respectively.

These two dimensions of fetishisation and value creation in part rely upon the "conjuring" of ideas and imagined qualities, in what Tsing calls the "economy of appearances" (2000). In the green economy, Igoe argues that this conjuring happens through spectacle and "dramatic performance" (2010, citing Tsing, 2005). Similarly, Cavanagh and Benjaminsen highlight the role of spectacle in carbon off-setting, which relies upon "the circulation of virtual representations" (2014: 62). These observations show how *performance* is another key aspect of value creation in the green economy, alongside spectacle. This notion is supported by Bracking, who defines "performativity" in the green economy as "the role of the evaluative calculation in producing value purely on its own account" (2015: 2349). Thus, we extend Bracking's observations to context of REDD+, noting that it involves the performance of mundane bureaucratic processes and rituals to demonstrate compliance with international carbon standards.

To understand this bureaucratic dimension of performance within REDD+, the literature on "audit cultures" is fundamental. Strathern defines audit cultures as the systematic practices and rituals of assessment that are now pervasively deployed to demonstrate or *perform* accountability – in effect, to generate confidence or trust in public institutions (2000). This is particularly relevant in our neoliberal-managerial age, in which auditing techniques apply across all realms of professional practice and public life, involving the measurement and counting of so-called productive activity. Audit practices are necessarily bureaucratic and mundane - yet, seen together, they become a "cultural artefact" that demands attention (Strathern, 2000), not least because of their potential "dysfunctional effects" in relation to public governance

and ethics (Shore and Wright, 2015). Here, Shore and Wright speak of a "new type of governmentality based upon financial calculus" in which governance is "by numbers… and *through* numbers" (2015: 430), signalling a tyranny akin to Arendt's "rule by Nobody" (1969). Needless to say, audit culture applies directly to the carbon-offsetting industry. This is because the performance of accountability by project managers, through constant measurement, verification, certification and accounting (see Ascui and Lovell, 2011), is what produces value.

Importantly, since most bureaucratic activity is ritualised and performative (Strathern, 2000), there is a necessary gap between lived realities and what emerges from the script. For Ball (2000), who examines this phenomenon in the higher education sector, bureaucratic performance is sustained by *rituals* like "spectacular displays", inspections, or job interviews; and *routines* like record keeping or staff meetings. Here, he describes the dissonance experienced by teachers as they struggle between their personal judgements on good practice, and the auditing requirements of neoliberal governance, articulated by one teacher as: "My first reaction was 'I'm not going to play the game,' but I am and they know I am" (2000: 6). This statement illustrates how critical consciousness and resistance can co-exist with compliance; much as Scott observed in his notion of the "hidden transcripts" of those who resist domination, yet appear to be compliant (1992). The implication is that dissonance is an integral part of the reproduction of dominant discourses through performance. Thus, for the ostensibly hegemonic green economy, the need for performative rituals signals the presence of hidden realities. As we now show in the case of REDD+, the production of value-added green commodities would not be possible without a two-way performative process of 'suspension of disbelief' on the part of the buyer, and 'playing the game' on the part of the producer.

3. Studying REDD+ implementation processes

The empirical material in this article derives from three years (2012–2015) of ethnographic research into a REDD+ project in Cambodia, as well as more recent analysis of publicly available documents associated with the project, published mainly by the Voluntary Carbon Standard (now called Verra). Here we explain important aspects of our research methods, including how we gained access to the REDD+ project processes, and the ethics of writing about this as embedded researchers or "engaged anthropologists" (Kirsch, 2018).

The study of project implementation or "project ethnography" is now well established as a research method, although it can raise ethical and personal challenges for researchers (Mosse, 2006). The method entails participant observation of practices and discourses inside projects, and it has been used in settings as diverse as international development, biodiversity conservation, and transport engineering (e.g. Mosse, 2005; West, 2006; Latour, 1996). Often, anthropologists gain access to the projects that they study and write about through employment as consultants or advisors. When ethnographers work for the projects that they study, they often bear witness to or participate in project processes that are meant for "insiders" only. In such cases, the research process – whether it be premeditated or *post hoc* - requires open discussion between the researcher and his/her subjects, who are likely to be colleagues, friends and employers (Mosse, 2005). Furthermore, the research findings can sometimes be confronting or unsettling for those who have been studied (Mosse, 2006). This should not render the research invalid or unethical, so long as issues of consent and researcher positionality are addressed (Mosse, 2006; McKenna, 2010).[6]

Grey areas do arise, however. Sometimes "things happen" which demand to be told, even if the researcher had no intention of writing on

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[5] Of course, the original process of commodity fetishisation was described by Marx. See Kosoy and Corbera (2010) for how this applies to the valuation of ecosystem services in the green economy, which they argue produces a narrow focus on exchange-value for trading, while ignoring other ways to ascribe value to nature.

[6] In this case, we shared the draft manuscript with the international NGO in Cambodia, but no specific feedback was received. In part this may be due to the time that has elapsed since data collection.

the subject matter at the outset. Scheper-Hughes' notion of "the primacy of the ethical" (1995) provides legitimate methodological space for this, by proposing that anthropologists have an obligation to bear witness to what is around them, and to expose injustices (see also Kirsch, 2018). In political ecology, we find this stance in the "epistemology of social justice" (Forsyth, 2008); and in applied anthropology, we are told that good praxis involves constant observation, note-taking and critical engagement, even if research is not *officially* being conducted (McKenna, 2010).

In this spirit, we present ethnographic data about REDD+ project processes that we both observed *and* participated in. Access to the project was negotiated through a working relationship with the conservation NGO involved, as part of a wider research project on REDD+ in Mainland Southeast Asia. As a result, important moments in project implementation could be observed transparently, and the researchers spent extended periods in the field interviewing villagers and local stakeholders about their livelihoods, and their experiences with the REDD+ project. However, it is important to acknowledge that, concurrently, the first author also worked as a part-time volunteer and consultant on the REDD+ project for seven months (in 2012). This engagement did not entail premediated data collection, but it did lead to key insights that feature in this article, due to her role in supporting the NGO's implementation of FPIC and indigenous communal land titles, both associated with REDD+. What she witnessed during this time, in terms of the NGO team's deft treatment of the dual demands of REDD+ policy and the Cambodian government, became an inspiration for writing this article. So too was critical personal reflection upon her own role in these processes, which ultimately could not guarantee that community voices were heard or that forest was saved.

Indeed, as the authors' official fieldwork continued (2014–15), the structural and material violence of the Cambodian context became increasingly clear: villagers that had consented to REDD+ under FPIC, while waiting for project benefits to materialise, were subjected to the ongoing and escalating negative impacts of illegal logging, land alienation, and forced displacement due to new Economic Land Concessions (Dara and Chen, 2018; Milne, 2015). These circumstances prompted us to examine the wide gap between REDD+'s early promises and actual lived experiences in the project area.

It has taken us five years to find an ethically appropriate way to frame and present this research, which rests upon significant levels of trust and openness on the part of project staff and villagers involved in REDD+. In part, our delay has been due to a keen awareness of the risks that critical analysis can pose to projects as they try to wend their way through the green economy - as seen in the case of Cambodia's other major REDD+ project, which recently had the buyer of its carbon credits withdraw amid controversy over illegal logging in the project area (Amaro, 2018). Under such circumstances, critical observers are often subjected to the wrath of spurned auditors and marketing bodies, as seen in that case (REDD-Monitor, 2018). Accordingly, we were warned by some project proponents against writing anything too critical on the REDD+ project.[7] This sensitivity and defensiveness, we argue, is a direct result of REDD+'s reliance upon virtual representations and images of success[8]; and it constitutes a key aspect of bureaucratic violence, to which we return in the discussion.

Finally, through our period of analysis and writing, we have come to understand that the individuals we observed in the REDD+ project were simply doing what the system demanded of them. One advantage of having worked on the inside is that it enables this degree of empathy.

We recognise the challenges faced by NGO staff, who are so often asked to implement or indeed *perform* the impossible. For this reason our analysis focuses upon the bureaucratic and audit constructs that shape NGO possibilities for action. It is now necessary to go beyond the easy critiques of specific projects and organisations, to consider the role of systemic issues in the green economy.

4. The violence of compliance with REDD+ standards in Cambodia

The production of forest carbon in Seima Wildlife Sanctuary occurred through the implementation of a range of bureaucratic processes. Here we observe how the international carbon standards demanded particular actions and evidence from the project team[9], which often led to performative or ritualistic displays of compliance. In turn, we show how the bureaucratic achievement of compliance worked to disguise highly problematic and unjust local realities, related mainly to community voices and resource rights, including indigenous communal land titling. Our analysis proceeds as follows: first we cover the bureaucratic architecture of the REDD+ scheme; second, we examine how the FPIC process was orchestrated and performed, in spite of local dissonance; and third, we explore how the final moments of validation and verification were accomplished through technical manoeuvring that had violent effects.

4.1. Bureaucratic architecture

The production of "trusted and fungible" carbon credits relies upon a highly evolved, yet ever changing, carbon bureaucracy. Key to the production of tradeable credits is compliance with the Voluntary Carbon Standard (VCS). For added-value credits that promise desirable qualities and lower risk, there are optional measures to comply with the Climate, Community and Biodiversity Standards (CCB). These two sets of standards comprise the bureaucratic architecture of the voluntary carbon market. The VCS has a dizzying array of rules and requirements that must be met by projects, so that they can first register with the VCS, and then be issued with tradeable units of carbon known as verified carbon units (VCUs). According to guidance online, the key stages in registration are summarised in Table 1.

These techno-bureaucratic steps can be seen as a carbon credit production line (see Mahanty et al., 2015). Herein, the work of project proponents and independent auditors is guided by a frequently updated and technically complex set of documents, which the VCS warns are changeable and must be checked regularly, as the website states: "Documents are updated periodically. Please check this page to be sure you are using the latest version of a given document".[10]

The level of specialisation, effort and knowledge required to engage in this process has now spawned a side industry– one that is tightly controlled by those who maintain the international carbon standards. For example, the independent auditors who conduct validation and verification processes on behalf of VCS must come from a formally trained and VCS-approved "Validation and Verification Body" or VVB. Furthermore, becoming and remaining a VVB is not straightforward. Verra, the body that oversees VCS registration, explains that "VVBs are qualified, independent third parties which are approved by VCS to perform validation and verification. This independent assessment process is critical to ensuring the integrity of the projects registered with the VCS Program".[11] The website lists 23 "active" or certified VVBs, and

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[7] These warnings in part were prompted by cautionary advice received by the NGO from the Forestry Administration, about the undesirability of critical research.

[8] The importance of images of success has also been noted in the context of other conservation and development projects too, not just REDD+ (e.g. Saito-Jensen and Pasgaard 2014, Büscher 2014).

[9] Here we refer to the group of staff based mainly in Cambodia, hired by the NGO. Some were also FA staff.

[10] See http://verra.org/project/vcs-program/rules-and-requirements/ [accessed 4th April 2018]

[11] See https://verra.org/project/vcs-program/validation-verification/ [accessed 12th October 2018]

Table 1
Key steps in the VCS registration process.

Step #	Description
1	Presentation of **project documents** (PDs) by proponents to the **VCS registry**
2	After checks, release of the documents for **public comment**
3	**Validation** of the project for compliance with the standard. The promised emissions removals or reductions are then **verified** for a given period by independent and VCS-certified auditors, who are contracted by the project proponents. **Auditors** draw on project documentation, discussions with project personnel, and one or more site visits to complete this process. **Proponents** may need to respond to clarifying questions or take corrective action, to achieve compliance.
4	**Project registration** and **VCU issuance** require a full set of documents about the project, including validation and verification reports, and "representation" documents from the auditors that **certify compliance** (VCS 2017a:16). This process also involves payment of fees for registration and credit issuance to the VCS registry (VCS 2017c).
5	**Compliance** with the above procedures is then checked by VCS administrators to ensure "completeness" and "accuracy" (VCS 2017a:22-23).

Source: VCS (2017a, 2017b, 2017c, 2017d).

27 "inactive" VVBs who either lost their accreditation or had it suspended.[12] Thus, the industry places great emphasis on quality control and accountability – the very processes that underpin value generation.

For those seeking extra market value and a straightforward sale, the option of meeting the CCB standards is fast becoming imperative. The VCS standards set out a requirement for "no net harm" in relation to environmental and social impacts, which should be achieved through local stakeholder consultation and periods of public comment.[13] However, the CCB standards go further, specifying stringent requirements to demonstrate environmental and social benefits. A notable example is that the CCB standards require FPIC to be implemented with affected communities. For social justice advocates, this requirement represents due recognition of indigenous rights (Mahanty and McDermott, 2013), a sentiment that is prominent in the REDD+ safeguards under the United Nation's Framework Convention on Climate Change (UNFCCC).[14] However, for the voluntary carbon market, the embrace of FPIC is arguably more about risk minimisation than indigenous or community rights.

This emphasis on risk-aversion is evident in the VCS validation reporting, in which community engagement forms part of the so-called "non-permanence risk analysis" for a given project. Here, the underlying assumption is that community non-compliance or resistance could damage the "permanence" of emissions reductions. The add-on CCB certification is similarly pitched to buyers for its risk management benefits, with its ability to "identify high-quality projects that are unlikely to become implicated in controversy" (VCS, 2017d: 4). Sellers, in the meantime, are enticed to CCB through the possibility of value addition, or the chance to gain a price premium from CCB verified carbon units. Indeed, CCB certification is now an essential feature of the voluntary carbon market, with over half of the carbon traded being CCB-certified. Buyers pay an average of US$2.7 *more* per tonne for CCB-certified VCUs than for ordinary VCUs.[15] Thus the CCB's value-adding properties are already being financially realised. The implication of this market value for FPIC is that it too becomes part of the CCB brand – or, just another "rubber stamp" among many, which serves a variety of interests including those of investors, project proponents, governments, conservation organisations and validators. But while FPIC plays a role in value generation for these actors, this does not necessarily mean that local demands or perspectives have been addressed.

The Seima REDD+ project undertook VCS and CCB certification over a period of about eight years (2008–2016), as outlined in Table 2. The following section describes how FPIC implementation unfolded.

4.2. Witnessing the performance of FPIC

FPIC had to be implemented in order for the Seima REDD+ project to comply with the CCB standards. Furthermore, as a national REDD+ demonstration project, FPIC here served the additional purpose of piloting international best practice for REDD+ in Cambodia. The process was developed and conducted between 2010 and 2013, with the support of various donors, Khmer project managers, and foreign advisors. The first step involved a thorough review and synthesis of international FPIC principles and guidance from UN-REDD, the CCB Standards, and the Regional Community Forestry Training Centre[16]. This guidance was then adapted to the Cambodian context.

Adapting the FPIC tool to Seima presented several design challenges, which had to be addressed before community consultation could take place. A key issue was that of inter- and intra- community heterogeneity. Target villages were identified because they were either located in the project area, or they used resources from it. In 2010 this amounted to over 2600 families, or 20 villages, scattered across a vast forest landscape. Those living in remote, forested areas tended to be Bunong ethnicity, leading largely subsistence livelihoods. Those living closer to the buffer zones, with good road access, tended to be affected by rapid Khmer in-migration and the embrace of new markets for land and cash crops (Mahanty and Milne, 2016). The idea of "village" or "community" in these areas was fast-changing and contested. Village coherence was also affected by the presence of powerful, absentee landowners, who exerted influence over local leaders (Milne, 2013).

To tackle this social complexity, the project managers decided to implement FPIC through a series of village-level agreements. Nominated or elected village leaders were to sign an agreement with the Forestry Administration consenting to REDD+, on behalf of all households in their village, amounting to a total of 20 agreements for the project area. This was a pragmatic decision, but it left now-familiar questions about community representation in FPIC unanswered (Mahanty and McDermott, 2013; Szablowski, 2010), including, how village representatives would be legitimately chosen.

The project managers did their best under the circumstances. In villages where indigenous communal land-titling was underway, the local representative committees formed as part of the titling process were selected to be the FPIC signatories – in particular the committee chief. Where such committees did not exist, the government-appointed village chiefs were asked to be FPIC signatories, with the blessing of local authorities. In Cambodia it is well known that most government figures are beholden to the ruling party and elite interests, especially district and village officials (Sullivan, 2016). Thus, the decision to work through village chiefs was a major departure from FPIC ideals, but it

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[12] See http://verra.org/project/vcs-program/validation-verification/ [accessed 4th April 2018]

[13] See Section 3.17 Safeguards in VCS Standards: VCS Version 3 Requirements Document, 21 June 2017, v3.7, http://verra.org/wp-content/uploads/2018/03/VCS_Standard_v3.7.pdf (VCS, 2017a).

[14] Adopted in Cancun in 2010, these safeguards urge developing countries to pay attention to the knowledge and rights of indigenous and local communities, and to ensure their "full and effective" participation. See http://unfccc.int/resource/docs/2010/cop16/eng/07a01.pdf#page=2 [accessed 13th April 2018].

[15] See < http://verra.org/updates-about-ccb-standards/ > [accessed 10th April 2018].

[16] For example, see UN-REDD (2012) and Anderson (2011).

Table 2
Project timeline for the Cambodian case.

Carbon Production Steps	Key actions
Government endorsement of REDD+ project	Council of Ministers endorses "carbon conservation" at the project site, and creation of the Seima Protection Forest (WCS, 2009)
Clarification of tenure arrangements	Local resource rights mapped (2003 onwards) and applications for Indigenous Communal Land Title secured or underway in many communities (2010 onwards), with ongoing tenure clarification foreshadowed in REDD+ plans
Community consultations (VCS) plus FPIC (for CCB)	FPIC process run by WCS-FA team, with third party community legal advisors and indigenous language translators (2011–2013)
Submission of project documents and deeds	Project development commenced 2008; project design document (PD) submitted 2013
Validation	VCS: Validation commences Nov. 2013; final report 29 December 2014; "VCS Verification Deed" submitted to VCS 16 March 2017. CCB: Validation undertaken in parallel with VCS validation; final report 16 November 2015
Implement PD measures	Increase forest protection, e.g. through stepped up Forest Law enforcement
Verification	VCS and CCB verification (for period 1/1/2010–12/31/2015) covered in one final report dated 4 April 2017, Statement of CCB standards compliance issued (4 April 2017)
VCS and CCB registration	Approval to CCB Gold level 16 November 2017 (VCS, 2018)
Sell credits	Agreement for sale of carbon credits to Disney Corporation (WCS, 2016)

Source: adapted from Mahanty et al (2015). See also VCS (2018).

was at least technically defensible and implementable in the Cambodian context.

Other design problems similarly required a kind of techno-bureaucratic maneuvering around local contextual issues. For example: What is 'free' and 'prior' in the context of a long-standing conservation project, in which new REDD+ financing will simply contribute to ongoing implementation of project activities? What is 'consent' when the project's legal basis is the protection of state public property, known in Cambodia to override customary rights in violent ways (Springer, 2013)? Lastly, how can meaningful written agreements be established with Bunong people, whose mother tongue is not a written language and whose Khmer literacy skills are very limited? Plausible technical answers to these questions were developed by project staff (see Kim, 2012), in effect building a project narrative for staff to adhere to, or a techno-fix for the task of having to implement a policy tool that did not fit the project or the Cambodian rural context well.

FPIC then proceeded in three phases: (1) local awareness-raising about REDD+, and a REDD+ social impact assessment in 2010; (2) drafting of the FPIC agreement text, which included seeking community feedback and independent legal advice in 2011; and (3) finalisation of the agreement text in 2012, and eventual signing of agreements by the Forestry Administration and village representatives in early 2013. We examine what happened during phase three, when the authors either witnessed or were involved in elements of FPIC implementation. Our analysis highlights key moments of dissonance, when gaps emerged between the FPIC ideal and project realities. In turn, we show how these gaps were concealed by *the performance* of project results through bureaucratic processes, in adherence with FPIC policy prescriptions.

4.2.1. The agreement text

The first instance of dissonance occurred in relation to the text for the village-level agreement. A draft agreement had been developed after exhaustive consultation with villagers and independent lawyers in 2011. But by mid-2012 its finalisation was still subject to legal review and government approval, after months of delay and deliberation within the Cambodian Forestry Administration. With donor deadlines for FPIC completion looming, the NGO needed to take swift and decisive action. This is when off-the-books improvisation and negotiation became necessary, in contrast to the rigour and transparency of the prior consultative processes.

The NGO acted deftly here, making the most of its long-term government relationships in Cambodia. It facilitated the necessary legal reviews of the agreement text in Cambodia and the US; collated the lawyers' feedback; and secured a meeting time at the Forestry Administration to seek final approval of the text. This meeting took place within the labyrinthine Forestry Administration building, and all

of the "right people" were present.[17] The agreement text was examined line-by-line, often painfully, as the Khmer-English translations were navigated. One key decision on carbon ownership was made at this meeting without much discussion: that the Cambodian Government would hold the carbon rights, even if indigenous people secured title to the forested lands in future.[18] This decision was treated by those in the room as just another technicality among many, to be resolved later when REDD+ actually happened. But it carries symbolic importance: for all of the care taken to craft the agreement text in consultation with local communities, and for all of the parallel international commentary on indigenous rights and carbon ownership (e.g. Sikor et al., 2010), the final agreement text was edited and decided upon privately, by a handful of key actors. Such was the need for pragmatism in the Cambodian context.

This departure from original intentions was also enabled by the fact that the agreement text had become a mundane technical object. Somehow no one owned it anymore, after all of the NGO advisors' comments, the legal amendments, and the time spent waiting for the Forestry Administration to respond. Even after the Forestry Administration's approval of the agreement, the final version of the text was temporarily misplaced by the NGO, given the numerous annotated versions of agreement text in circulation and turnover of key staff. Furthermore, the purpose of FPIC seemed so distant and vague to the project staff who had to implement it, given the ongoing uncertainties around REDD+ policy internationally and in Cambodia. As one expatriate staff said: "we don't even know what REDD+ is, so how can communities consent to it?" Nonetheless, FPIC was a requirement for moving forward with the validation process, so it had to be completed.

4.2.2. Formalising community consent

With government approval for the FPIC agreement text now in hand, the focus shifted to getting the agreements signed. Debate between the NGO and the government turned to whom was signing, and how consent should be given. While the NGO staff said "this is just about consent… the community committees can give it", the Forestry Administration staff were more concerned with "making it legal"[19]– they wanted a consent-giving process that used government structures and processes. They said that this should involve the village chief

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[17] Meeting attended by first author. The "right people" included the FA lawyer, the FA director for Seima, and a representative of the FA Director General.

[18] More than anything, this was so that the agreement text would comply with Cambodia's recent legal framework on REDD+ benefit-sharing (see Government Decision No. 699, May 2008; see Yeang et al 2014)

[19] Quote from the meeting attended by first author. See previous footnote.

seeking thumb-prints from every household in the village, to signal individual-level consent, and then a rubber stamp from the Commune Council. Thus, the community-level representative committees (known as *sahakoum*) were bypassed[20], even though they were legal entities, and a new governmental requirement for FPIC completion was introduced. We suggest that this was about ensuring that the consent process would be perceived as robust in the eyes of more senior government officials, like the Director General of the Forestry Administration, who had apparently requested this new consent strategy. It also ensured that the FPIC process engaged Cambodian rituals and sources of authority (see Hughes, 2001), where "thumbprints are more important than signatures" (Mahanty, 2017).

Thus, with this new governmental requirement for FPIC, a new set of implementation challenges emerged for the NGO. It was the wet season, the household thumbprints were required as soon as possible, and there was no budget for this unanticipated consent-seeking process, which would require lengthy visits to all twenty villages in the project area. What ensued was, again, masterful on the part of the NGO in terms of its administrative and logistical creativity. Paper consent forms were designed and printed - one for each household - and a process for getting them thumb-printed was devised. It was deemed, after guidance from the government, that getting 70–80% of households in every village to complete the consent form would be acceptable. This would involve at least 1000 forms. Ultimately the only way to achieve this, given the time and budget constraints, was for the FPIC activities to "piggy back" on other planned community engagement processes, namely the indigenous communal titling that was underway in several villages. This was a frustrating diversion for the NGO team, who needed to advance the indigenous communal title processes urgently, but was probably convenient for certain government officials who preferred to drag their feet on the issue of indigenous rights to forested land (Milne, 2013).

Nevertheless, the thumb-printing went smoothly in most villages, as it followed typical Cambodian protocols. First, the village representative committee was assembled by the NGO team for a meeting[21], to "remind" attendees about REDD+ and the community agreement that they were soon to sign. Subsequently, the village chiefs (*mey poum*) and intra-village "group leaders" (*mey krom*) were asked to call "their people" to attend the thumb-printing sessions, which were at appointed times and places in the village. Thus, the consenting space was the meeting between NGO and village representatives, while the subsequent thumb-printing by households was a procedural consequence of local hierarchies and protocol. In practice, mainly women came to the thumb-printing: they were the ones at home in the village during the day, although they were the least likely to be able to read the consent form or ask questions of the NGO team. There was no observed discussion or reading of the form during thumb-printing sessions. Rather, it seemed as though the discussion had already been had, in the process of villagers being summonsed by their superiors. Nor were there any qualms about one household representative providing three or four thumbprints on one form, to cover for all of the adults in their home. For Milne, the only foreign observer, these departures from the individual consent-giving ideal were striking. But after discussion with the Khmer team, she understood that the thumb-printing was largely a ritual procedure, which did not provoke local concern.

Consent-giving issues *did* occur in two villages, however, which provoked a problem-solving flurry among the NGO staff. Located in the project's buffer zone, the two ethnically mixed villages had seen rapid

in-migration by Khmer farmers and elite land grabbing, which had disrupted local social cohesion and caused rapid forest loss (Mahanty and Milne, 2016). As one NGO staff member explained: "these are broken villages… maybe we should remove them from the FPIC process?"[22] Here, the problems with FPIC revolved around land conflicts, and the villagers' confusion between the REDD+ project and ongoing land tenure interventions. In one of the villages, where an indigenous communal land titling process was underway, one quarter of the village initially boycotted the thumb-printing process because they thought it would preclude them from securing individual land titles later on. The boycott was apparently arranged by elite interests in the village, who aimed to disrupt NGO activities that would limit their land dealings (see Milne, 2013). However, following Cambodian protocol, the NGO resolved this issue by appealing to higher powers: the commune chief was engaged in the matter, and he instructed "his villagers" to comply with the thumb-printing. In the other village, about 50% of households boycotted the consent process. This is because they wanted to clear forest land, which legally belonged to the government. Or, as the Forestry Administration manger explained: "those who are cutting forest will not provide consent. If we give them land, they'll consent…". This meant that the dissenters were treated as potential law-breakers. Dealing with them became a matter of law enforcement, not consent-seeking.

4.2.3. Performing consent at the FPIC signing ceremony

With a thousand household thumbprints now secured, NGO efforts turned to the signing of the twenty village-level agreements. The Khmer project team insisted that a ceremony would be required: a formal, public ritual, during which all parties to the agreements would display their consent and willingness to collaborate on the REDD+ project. What ensued was a uniquely Cambodian performance aimed at an audience of government officials, donors, and CCB validators.

The venue was the Provincial Forestry Office, and the event was heavily configured around state power. In the class-room format of the hall, villagers sat in rows like students or subjects, to watch the government officials on stage. Everyone had to wait for the arrival of the Provincial Governor, who was inexplicably late, before the highly-scripted proceedings could begin. Every speech was written by the NGO, with nothing left to chance. Those who spoke were selected carefully: the Provincial Governor, the donor, one local village chief. The Bunong community representative for the whole Protected Forest who *should* have spoken was not given the opportunity to do so – apparently because he could not read. And so, any truly representative or potentially dissenting local voices were not given space. This was a moment of spectacular display, not a moment for further dialogue with villagers. To finish, after the agreement was read out loud, three model villages signed off in front of everyone, providing an essential photo opportunity for donors and project actors. The other seventeen agreements were to be signed later, once the busy officials had left.

Off-stage, the NGO staff were left with a scramble of paperwork, as they tried to coordinate the necessary signatures for all agreements. Village chiefs and committee chiefs had to be "rounded up" for all of the twenty villages. The idea was that they would first sign the agreement, and then they could receive their *per diem* payment for attendance. But not everyone had attended the ceremony, and some had left immediately afterwards for lunch, neglecting to sign their village agreement. At the end of the day, this left about half of the agreements without the full set of signatures. More than anything, these observations point to the performative nature of the FPIC ceremony.

Indeed, the performativity of the ceremony served project and state

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[20] There were 14 of these committees in place, for 14 villages. Alternative arrangements had already been discussed for the 6 villages that did not have a committee.

[21] One meeting per village was held. The village committee was either the indigenous representative committee (in 14 villages) or a combination of the village development committee and commune council (in 6 villages).

[22] This comment reflects the local complexity, in which local indigenous villages had been flooded by new Khmer migrants seeking land. Few migrants were official residents of the village, and this raised legitimate questions about their potential role in the FPIC process.

needs, just as much as it helped to meet validation requirements. Official speeches at the ceremony revealed this, as the main message was that of a rallying cry for wide, ongoing participation in REDD+. For example, the Deputy Provincial Governor said: "All the documents have been prepared to show how villagers participated, but it should also happen in practice. Officials should [also] support villagers to protect the forest…" Thus, the spectacle of the ceremony not only signaled the completion of FPIC– it was a ritual, symbolic display, used to show progress and to garner support.

4.3. The validation and verification experience

With all of the requirements of the VCS and CCB standards met, the project proponents then moved to complete validation and verification. The contracted Validation and Verification Body commenced work in November 2013 and concluded in July 2017 (see Table 2). Following usual practice, validation and verification occurred in tandem. This involved the auditor's preparation of "assessment reports" on project compliance with the standards, achieved through a review of existing project documents, and a four-day site visit. The auditor recruited a translator for fieldwork so as to avoid any bias that might be introduced by a project-supplied translator. The Cambodian translator then undertook at least one follow up visit, to our knowledge. According to online documentation, the auditor's assessment process identified several areas for explanation or remedial action by project proponents.

Three moments in the validation process stand out in relation to the bureaucratic exigencies of carbon production, and their potentially insidious nature. The first relates to how ostensibly simple rule changes in the international standards had arbitrary, yet time and resource consuming effects on the ground. The second was when technicalities related to VCS project "permanence" ultimately led to the undermining of indigenous rights and claims in the REDD+ project area; and the third was when local concerns over illegal logging were deflected and absorbed as mere evidence to support the project's case for "additionality".

Regarding the first point, rule changes are commonplace on the VCS website, taking the form of new document "versions", as old versions are retired or archived. This happens at least annually, which can pose a problem for projects under development for several years: which set of rules applies? Guidance on this question is usually buried within the latest manual, but apparently small adjustments on a website can hold substantive implications for project personnel and their documentation of project processes. In Seima, this happened in relation to CCB's community awareness and consultation requirements. The initial validation report observed that although village leadership appeared knowledgeable about the project, citing evidence of their engagement in project discussions, this was not so at a broader community level. The document therefore called for the project to prepare broader consultation and communication plans[23]. Furthermore, the validator was concerned that there may have been limited local awareness about the CCB's "public comment" and "grievance" procedures.

These findings generated a flurry of activity on the ground, as project personnel duly prepared communication plans and conducted community awareness-raising activities. Here, the grievance question was dealt with through the issuance of "grievance cards" that contained information and a website link on the project's grievance mechanism– these cards were issued regardless of whether local people understood them or not, as one staff member shared. Ultimately, however, a reformulation of the CCB standards made the validator's original concerns moot, as recognized in the Auditor's later report:

Auditor Response: Subsequent to the issuance of this finding, the

audit criteria changed such that the project was assessed against the CCB Standards Third Edition. The CCB Standards Third Edition does not contain the requirement that was quoted in the text of the finding. Therefore, the finding is formally considered to be withdrawn, as it is no longer applicable. (SCS 2015: 94)

This example shows that the apparently bland audit process *can* raise substantive issues, leading to significant efforts on the ground – in this case in relation to the breadth of community engagement and local options for recourse in the event of a grievance. Yet, just as easily, the whole issue was overridden by a minor rule adjustment. In this sense, bureaucratic demands are not simply met through performance: they do, powerfully, influence action, even if this is arbitrary.

The second problematic verification moment arose in relation to the place of indigenous communal title (ICT) within the project area. From its early days, the Seima project incorporated practical support for indigenous communal title claims in the area, under the Cambodian Land Law (Evans et al 2012). For the project proponents, ICT was considered to be a way of securing forests and supporting conservation-friendly land use in the buffer zone. Although a promise of carbon revenues from communally titled lands was never made to communities, project support for ICT *was* framed as one of the potential REDD+ project benefits.[24] In this way, the distinction between ICT, REDD+ and FPIC activities became blurred – all were implemented by the community engagement team, who presented a single "project face" to local villagers.[25]

From the perspective of the auditor, however, the presence of areas under potential or existing indigenous title presented a threat to project "permanence", since communities could seek to use land in ways other than stated in the project document. Or, in the cumbersome language of validation, ICT was framed as a risk to the carbon credits, because it could mean the lack of an "enforceable and irrevocable agreement with the holder of the statutory, property or contractual right in the land, vegetation or conservational or management process that generates GHG emission reductions or removals which vests project ownership in the project proponent."[26] Once deciphered, this finding caused much angst and deliberation for the NGO team, over what had always been a central facet of the project. Eventually, to comply with the standards, they saw little alternative than to excise the ICT areas from the core REDD+ zone which would then remain as a state-owned protected area unhindered by ICT. Project staff were visibly concerned about the potential consequences of this for their relationships with local communities, especially in light of the expectations raised through their earlier combined FPIC and ICT activities, which provided a key reason for local participation in REDD+ in the first place[27]. Even though the NGO would continue its support for communal titling, this moment was an unfortunate rupture in the local REDD+ project narrative. Ultimately, the ICT areas were excised from the project in order to respond to the validation findings. This is acknowledged in a perfunctory comment by the validator: "The Client's response adequately addresses the finding". But major unanswered questions were left about the future of indigenous rights in the Seima REDD+ project, and the VCS' inability to deal with situations of mixed tenure or tenure that is contested and violent in nature, as is the case for most state-held forests in Cambodia (Milne, 2012; Springer, 2013). Furthermore, although compliant for the

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[24] In 2012, the first author worked as a volunteer for the NGO preparing a technical report on REDD+ benefit-sharing.

[25] As observed by the first author, who worked alongside the community engagement team in the field.

[26] VCS Standard 3.4, current at the time. The current VCS Standard 3.7 no longer contains this language.

[27] Through the FPIC consultations, the idea of a village development fund to channel carbon revenues to local communities was communicated to villagers by the NGO, in line with Cambodian legislation on REDD+ benefit sharing (see Yeang et al 2014).

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[23] See the Final Validation Report at VCS (2018): 'Reduced Emissions from Deforestation and Degradation in Seima Protection Forest, 16 Nov 2015, p. 93.

purposes of carbon production, the factoring out of indigenous claims in this case is inconsistent with REDD + 's promise to deliver co-benefits[28].

The third example of the insidious effects of carbon accounting lies in the project's case for "additionality". All carbon projects must establish that their emissions reductions are additional to business-as-usual scenarios. In Seima, it was the government's weak enforcement of the Forestry Law that provided the grounds for additionality, as the validation report explains:

> "The majority of unplanned forest loss in all scenarios is technically illegal, but those legal requirements are weakly enforced for a variety of reasons and non-compliance is the norm across the majority of the reference area and the broader region of north-east Cambodia. This is evident from an inspection of deforestation data for the historical baseline period and from participatory rapid assessments conducted in many villages in the area"[29]

The "variety of reasons" referred to by the auditor include entrenched issues such as rent-seeking by local officials, and the involvement of elite and military interests in illegal logging, timber trafficking and land-grabbing (Milne, 2015; Mahanty and Milne, 2016; EIA, 2017; Dara and Chen, 2018). There is no shortage of evidence and discussion about these issues in the project area, especially as they have had a deleterious effect upon local indigenous livelihoods. As far back as 2010, in the REDD + community consultations documented by the project proponent,[30] repeated concerns were expressed by local people over illegal logging in the area. Yet, for the purposes of validation, these voices were counted merely as evidence of the project's case for additionally, and of the project's compliance with community consultation rules. As project personnel also explained, ongoing illegal logging of luxury timber in the project area would not affect the carbon stocks very much, and this was already factored it into the model. This "accommodation" of logging into the carbon model showed that carbon trumped other conservation goals such as stemming biodiversity loss. Beyond this, the readiness to accommodate logging was a tacit acknowledgment of the elite-backed and effectively untouchable political economy in which the REDD + project was embedded.

In the end, the validator only needed proof that non-enforcement of the law was standard practice for "more than 30% of the project area". This was achieved with a letter that was duly – and it must be said ironically – provided by the Forestry Administration, who could confirm that, indeed, weak enforcement was not only the norm in over 30% of the Seima area, but was also the case in over 30% of Cambodia as a whole. This satisfied the validator, leading to his conclusion that: "The evidence and information provided is sufficient as demonstration that the requirement of VT0001 has been fulfilled. Therefore, the information request has been satisfied". Thus, the project's case for additionality was confirmed, without any discussion of the actual feasibility of future law enforcement in the project area, let alone its violent effects. Recent evidence suggests that this will be very challenging, with the recent murder of three local park rangers who tried to tackle the illegal logging in the project area in early 2018 (Associated Press, 2018), and the ongoing deterioration of community livelihoods and hope in the face of forest loss (Dara and Chen, 2018).

In short, these examples show how validation and verification processes *can* raise the potential for REDD + to engage with the substantive issues of rights, voice, and access. Yet this potential goes largely unrealised, due to the limited and constantly changing deliberative spaces that are provided by REDD + 's technical standards. These spaces are especially constrained by the apolitical simplifications required by REDD + 's bureaucratic constructs, and the performance of compliance of by validators and project proponents alike.

5. Towards an understanding of bureaucratic violence in the green economy

Our ethnographic examination of the application of technical rules and standards for the production of carbon credits provides key insights into the green economy. Overall, we reveal that the green economy relies on a very particular kind of bureaucracy – one that places stringent demands upon the material it treats and those who implement it. This is because, as we have shown for the carbon market, the demonstration of accountability and quality are essential to value generation. Without this, carbon credits cannot be considered as "trusted and fungible", nor can they acquire value-adding properties like being "low risk". Those who implement the bureaucracy, therefore, are compelled to uphold its constructs. This leads to performative behaviour on the part of project proponents, who must demonstrate compliance with rules that do not necessarily fit the local context well. It also gives rise to power dynamics, in which the work of validation can only be practiced by vetted experts; criticism is poorly tolerated; and the rules for compliance keep changing. We argue that the combined social and political effects of this techno-bureaucratic regime are violent, in large part because of the structural and material violence that they disguise, ignore, or extend.

We propose the notion of bureaucratic violence, by drawing on diverse literatures about the nature of bureaucracies and the mechanisms of control that they deploy. In the case of REDD +, the sanitized and instrumental use of social safeguards can be compared to Herzfeld's "bureaucratic indifference" (1992), where systems established for accountability ultimately generate a detached and abstracted disinterest. The violence that we are referring to here is not physical so much as symbolic, similar to Bourdieu's observation that "symbolic violence" was inflicted where religious rites and discourses were deployed to normalise unjust conditions (1979). In this way, the technically framed and quietly deployed rules and practices that are normalized in the carbon market may be interpreted through the lens of violence. Here, Arendt (1969) adds the important insight that instrumental practices of the kind observed in this case study can take on the mantle of violence when used in the service of power. In our study, "following the rules" simultaneously serves to legitimise and normalise a *status quo* of elite-backed forest destruction and indigenous dispossession that is materially violent.

From our empirical observations, the phenomenon of bureaucratic violence in essence occurs through the *denial of dissonance*. That is, the denial of local voices and field realities through persistent deployment of and adherence to bureaucratic constructs, which simplify and conceal what is going on. Furthermore, as these techno-bureaucratic constructs lend legitimacy to and elaborate endemic forms of state power and injustice, they deepen underlying structural and material violence, as observed in other international conservation and development projects in Cambodia (Work et al., 2018; Milne, 2009; Hughes, 2001). In this light, we identify three key mechanisms through which bureaucratic violence occurs.

First, is the mechanism of performance, which conceals local realities. This was seen clearly in the way that the project team implemented FPIC. In the face of near-impossible bureaucratic demands from the CCB standard and the Cambodian government, and local conditions that did not lend themselves well to written agreements or democratic processes, the implementation of FPIC gave rise to spectacular and performative displays. Project staff and community participants knew this, and yet they played the game anyway: it was the only way to proceed, to secure potential REDD + funds. Furthermore, the

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[28] For example, see the UN-REDD website on the "multiple benefits of REDD +", the delivery of which is now a requirement through the Cancun safeguards. See http://www.un-redd.org/single-post/2017/09/08/The-fantastic-multiple-benefits-of-REDD-and-how-to-get-them

[29] See Final Validation Report (VCS, 2018): 'Reduced Emissions from Deforestation and Degradation in Seima Protection Forest, 16 Nov 2015, p. 69.

[30] See WCS, 2010. Community Consultation Meetings on the Seima Protection Forest REDD + Project Design Document, October 2014, accessed through VCS database (VCS, 2018).

performance of standards appears to provide a script and a structure to follow in the face of fraught project realities. As Arendt (1969) observed, with so many players in the bureaucracy, acts of violence can occur without consciousness or individual responsibility, as behaviour conforms to "doing what the system requires". And so, the performance of FPIC became a way to cope with overwhelmingly messy and unjust community dynamics; a value-adding rubber stamp for a market obsessed with risk management.

The second mechanism in bureaucratic violence is what the rules "see"[31]– in other words, what gets factored in or factored out in the process of demonstrating compliance. This was observed in the project's narrow focus on carbon, such that: (i) community concerns over illegal logging became evidence for "additionality", and (ii) conservationists' worries over the biodiversity impact of the logging were absorbed by the primacy of the emissions model. Similarly, the seemingly innocuous adjustments that were made to comply with the VCS requirements for "permanence" led to the excising of lands subject to indigenous claims from the REDD+ project area. These acts of "following the rules" effectively silenced local voices, and did violence to local hopes for achieving formal recognition of indigenous lands, and meaningful dialogue about the injustices of elite-backed logging and land-grabbing. All this, as the project demonstrated compliance with FPIC provisions.

The third dimension of bureaucratic violence relates to the way in which criticism is dealt with by those who administer the carbon market and uphold its technical rules. As indicated, we were warned personally about potential fallout if we were to write critically on REDD+; an experience that had subtle disciplining effects at the time. Furthermore, there is the example of those who *do* criticise openly, who suffer consequences that can be psychologically and symbolically violent. This was seen in late 2017, when the independent environmental organisation "Fern" authored a critical report about Cambodia's first REDD+ project in a different province, showing evidence of military-backed forest clearing that was undermining emissions offsets (REDD-Monitor, 2018). When the carbon credit buyer, Virgin Atlantic, later withdrew from the scheme, there was a shrill response from the validating and verifying body. In its open letter to Fern, the body stated:

> "Shame on you Fern and others who seek to limit opportunities for communities that desperately need financial resources to protect forests and make a decent living without offering any viable alternatives.... Shame on you Fern and others who criticize and impede a system (while not 100% perfect) that places value on independently audited results of communities reducing deforestation and degradation." (ibid)

Similarly, the VCS response systematically and publicly dismantled Fern's claims, saying that Fern had used "flawed analysis", and made an "emotional appeal" that was not backed up with "credible evidence" (ibid). This incident shows the self-protective character of the voluntary carbon industry, with its use of both moral and technical discourse to discredit critics. So important are perceived rigour and trustworthiness to the carbon standards, these qualities must be performed, maintained and defended – often with the erosion of professional ethics, which Shore and Wright (2015) observe as a "perverse effect" of audit culture.

Finally, we must ask what this means for the green economy. Our findings suggest that there is even more going on in ecosystem services markets than the known value-producing processes of commodification (Kosoy and Corbera, 2010; Peluso, 2012), spectacle (Igoe, 2010; Sullivan, 2013; Cavanagh and Benjaminsen, 2014), and performativity (Bracking, 2015). We have shown that bureaucratic violence also plays a key role in value creation, and the green economy itself. Spectacle and performativity point to the fetishisation of the carbon standards, especially the apparent qualities of rigour and ethical conduct that they

impart. However, we have observed the more mundane processes of "audit culture" that emerge from the need to demonstrate project compliance with international standards. Our case highlights how the mundane is capable of doing violence, since the painstaking bureaucratic effort to produce trustworthy and valuable carbon credits is also the effort of an elaborate construct or cover-up, which systematically ignores, conceals and at times deepens local experiences of structural and material violence. This phenomenon is another dimension in the emerging notion of "green violence" that up to now has emphasised the physical and politico-legal aspects of violent tactics to protect nature (Fletcher, 2018; Büscher and Ramutsindela, 2016; Fairhead et al., 2012). Bureaucratic violence is distinct because of its prosaic, technical processes, which work inconspicuously to conceal or dismiss critical voices, while extending systemic injustices and dissolving human responsibility for the consequences. Furthermore, its effects are potentially very widespread: as the leviathan UNFCCC's compliance-based REDD+ processes gradually take shape, we should be especially wary.

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[31] Echoing Robertson's early observations on "the nature that capital can see" (2006).

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