Policy integration as a means to address policy fragmentation: Assessing the role of Vietnam's national REDD+ action plan in the central highlands

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ABSTRACT

The Vietnamese National REDD + Action Plan (NRAP) seeks to reduce emissions from forest clearing and land use, especially from the main drivers of coffee and rubber commodity expansion. Achieving the NRAP goals, however, means negotiating a complex and fragmented forest policy arena, with conflicting sector goals, disconnects between global and local ambition and action, and imbalanced power dynamics between actors. We map the fragmentation of this policy arena and explore the extent to which the NRAP is able to integrate policy responses to drivers to achieve emissions reductions. We examine what the NRAP sought to integrate, what was not taken into account, what is integrated at which scale, and which actors are part of integration (or not) across the policy process components. We conclude that if policy integration does not affect a 'whole of government' shift in priorities or change in mandate among driver sectors, fragmented policy arenas will persist and forest-based climate mitigation objectives will not be achieved.

1. Introduction

Forests and natural resources are subject to increasing market and commodity pressures while demands on forests for their environmental services, such as climate regulation and fresh water, are increasing (FAO and UNEP, 2020). Recognizing the role of forests in meeting multiple human needs, developed and developing countries agreed in 2013 to a phased approach for reducing emissions from deforestation and forest degradation (REDD+). Under REDD + countries also agreed to assess both the direct and indirect drivers of deforestation and forest degradation (UNFCCC, 2013) that would in turn directly shape National REDD + Strategies or Action Plans (UNFCCC, 2010; 2013).

The focus of REDD + on direct and indirect drivers of deforestation and forest degradation means that any National REDD + Strategy has to take into account a highly complex set of policy domains. In Vietnam direct drivers of deforestation or forest degradation include any number of human activities or immediate actions that directly impact forests and land (Geist and Lambin, 2002), including logging, agricultural expansion, or infrastructure and road development. In some regions of the country, such as the Central Highlands, forest cover decreased by 20 % between 1976–2015 (IPSARD, 2015; General Statistics Office, 2017)

driven in large part by coffee and rubber, which have expanded by 29 % and 198 % respectively over the same time period. Underlying drivers of such deforestation, in contrast, are less well defined, combining complex interactions between social, economic, political, cultural and technological processes that are often distant from their area of impact (Pham et al. 2019; Skutsch and Turnhout 2020; Wong et al. 2020. In the case of Vietnam these include demand for agricultural crops and high value plantations, high poverty rates, expansion of economic growth, weak policy implementation, lack of tenure access to land and forests, poor agronomic practices, climate change (McNally et al., 2016; Eckstein et al., 2018; Do 2015), and pressure to increase commodity exports. The more diffuse nature of these underlying drivers means that while central to reducing pressures on forests they are often harder to identify and quantify (Geist and Lambin, 2002; Kissinger et al., 2012).

The process of defining and quantifying both direct and indirect drivers of deforestation and forest degradation within a National REDD + Strategy exposes the fragmentation of forest-related policy spread across the diverse policy domains of agriculture, energy, water, climate and rural development (Hogl et al., 2016). This fragmentation is characterised by incoherent or conflicting sector goals, disconnects between global and local ambition and action and imbalanced power dynamics

between actors (Hogl et al., 2016); Winkel and Sotirov 2015). It also may be affected by the multi-level nature of regulation and the devolution of rule-making authority to private initiatives like forest certification (Clapp and Scott, 2018). The challenge for developing an National REDD + Strategy is therefore not only to define and quantify drivers of deforestation and forest degradation, and associated policy responses, but also understand and overcome policy fragmentation. In the case of Vietnam, this challenge of addressing policy fragmentation was taken up directly in the National REDD + Action Plan (NRAP) with the government's recognition of conflicting goals between sectors, at various scales and their effect on reducing high rates of deforestation and unsustainable land use.

The success of the NRAP is consequently dependent on the degree to which the negative implications of policy fragmentation can be addressed through policy integration (Cejudo and Michel, 2017; Di Gregorio et al. 2017; Winkel and Sotirov 2015). The degree of such integration depends in large part on the role of national governments as policy integrators, using their authority to mobilise sub-national governments and non-state actors to align policy goals, ambitions and power dynamics (Setzer and Nachmany, 2018). In this paper we ask how and to what extent climate change and land use policy integration has enabled Vietnam to tackle the direct and indirect drivers of deforestation in the Central Highlands that affect forest-based climate mitigation objectives. The experience of the Vietnam government in their NRAP process therefore contributes to a more precise understanding of policy integration as a means of achieving climate action in complex national policy arenas with apparent high degrees of fragmentation.

The following sections further elaborates on policy fragmentation and integration as well as the methods used to investigate policy fragmentation of forestry policy and its integration through the NRAP process in Vietnam. We then map the degree of policy fragmentation before examining the degree of policy integration fostered through the NRAP. We conclude by discussing the ways in which policy integration contributes on policy outcomes as claimed in the wider literature.

2. Policy integration as a response to fragmentation

Fragmented policy arenas are characterised by dispersed and multi-level governance; where global principles and agreements are translated to national and sub-national policy and regulation, and between the public and private sectors (Ostrom, 2010; Van Asselt and Zelli, 2014; Jordan et al., 2018). It is also evident in contexts where the environmental outcomes of climate action, such as reduced and avoided deforestation, are dependent on the integration of highly divergent and often competing social, political and economic drivers.

The translation of global agreements into national policy leads to fragmentation as goals and objectives are divided horizontally between ministries and vertically between levels of government (Zürn and Faude, 2013; United Nations, 2018). The degree of fragmentation is often increased where these goals are aligned to separate policy domains or sectors. For example, the translation of climate change emission reductions into problems of energy, agriculture and forestry planning across associated Ministries and line departments. Policy responses also drive fragmentation when problems and solutions are divided and repackaged to fit the expertise and mandate of different parts of and levels of government (Howlett et al., 2015).

The strategies adopted by policy makers to overcome their negative consequences of fragmented policy arenas is subject to considerable debate. Van Asselt and Zelli (2014) assert that policy complexity and fragmentation is a given and question whether any strategy of policy integration can be 'effective' (see also Cejudo and Michel, 2017; Howlett et al., 2017; Rayner and Howlett, 2009). In contrast, Cejudo and Michel (2017) argue that policy integration requires pursuing policies and governance under a new logic that subordinates previous or competing objectives to the resolution of the overarching problem. This, they argue, involves the emergence of new policy process often under the

oversight or coordination of a decision-making body or process with authority over the components of this new strategy. Others still argue that, while not avoiding competition among sectors (Hogl et al., 2016), environmental policy integration can determine the relative weight (or 'principled priority') of environmental objectives in relation to sectoral policy objectives (Jordan and Lenschow, 2010). The goal of integration is then the identification of multi-dimensional policy portfolios which evolve over time, containing vertical (between different levels of goals, policies and levels of government) and horizontal (between different types of instruments, policies or governments) elements in the formulation of policy responses (Howlett et al., 2015). This means that different degrees of integration can emerge that reflect negotiation over which policy goals, actors and processes are made more coherent and/or more effectively coordinated.

3. Methods

We build on the debates described above by assessing the degree to which different elements in the NRAP can be considered a multi-dimensional policy portfolio addressing direct and underlying drivers of deforestation and forest degradation. We ask which elements of this portfolio are integrated, and with what effects, in the cases of coffee and rubber expansion? In answering this question we specify the extent the NRAP is able to integrate policy responses to drivers to achieve emissions reductions, by exploring (1) what it sought to integrate, (2) what was not taken into account, (3) what is integrated at which scale, and (4) which actors are part of integration (or not). We also seek clarity on whether policy integration has potential to affect direct and underlying drivers of deforestation as a multi-dimensional policy portfolio. Our analysis is divided into three interrelated steps.

First, we examine the individual components of policy separately; namely, *policy objectives/goals, policy actors, policy structures and procedures, and policy instruments* (Briassoulis, 2011). Policy objectives and goals are the outcomes that policy-makers wish to achieve, including agenda-setting. Policy actors are those influencing or influenced by the policy activities. Policy structures and procedures include the institutional arrangements, networks and patterns of interactions (Provan and Kenis, 2008), and the procedures by which the policy is to be pursued. Policy instruments are the tools applied to implement the policy.

Second, we consider the *processes* (e.g. inter-agency coordination, mainstreaming) and *outputs* (e.g. objectives, strategies, actions) of the integration process (Nilsson and Persson, 2003). We stop short, however, of assessing the *outcomes* of integration – i.e. whether behaviour changed in response. Tosun and Lang (2017) identify that evaluations of integration tend to focus more on procedural rather that substantive aspects of integration in policy-making. This has implications for the performance of integration, and relates to our interest to assess whether integration is instrumental in achieving better emission reduction outcomes.

Third, we analyse how integration is affected by the dispersion of goals, competencies and authority across multiple levels and scales of governance (Hooghe and Marks, 2001). Here we examine the extent to which different policy components are integrated in and across different levels and scales of governance (Candel and Biesbroek, 2016). Such policy integration is issue-, policy-, time- and context-specific, and the intensity of relationships and degree of influence varies depending not only on prevailing power relations, but also formal versus informal networks, institutional factors, and other aspects (Korhonen-Kurki et al., 2013). This is important when considering how a global climate commitment, framed in the NRAP, is nested into (1) national and sub-national actions, (2) pre-existing and/or new policy instruments, and (3) across a suite of actors and scales.

Literature on policy fragmentation and integration was reviewed based on keyword searches, seeking articles within the past ten years, or those highly referenced. The search terms included keywords related to policy and institutional fragmentation, fragmented government action,

environmental policy integration, policy integration, climate policy integration, cross-sectoral coordination, policy coordination, polycentric governance, multi-level governance, climate change, land use, forest policy, sustainable forest management, REDD + . The 45 articles identified were then reviewed in detail.

Literature on drivers of deforestation and forest degradation in Vietnam's Central Highlands and related laws/policies, government programmes, peer-reviewed literature were reviewed, resulting in 76 documents reviewed in detail. Key word searches were conducted, however, most of the literature was identified through the lead authors' previous work in Vietnam, and recommendations made by expert interviewees, including sector plans, key policies and laws, and private sector documents (thus not discoverable in (academic) databases). The policy documents utilized to assess policy integration were reviewed to assess the intention and extent of policy integration as a means to implement REDD + . Vietnamese policy and related documents were translated with Google translate and then checked or further translated by Vietnamese-English translators.

A series of interviews conducted in May and October 2018 with: (1) government officials at central, provincial and district levels; (2) international agribusinesses sourcing in Vietnam to traders and smallholder producers; (3) research organizations; (4) farmer organizations, (5) banks and lenders, and (6) bi-lateral assistance agencies, embassies, and development assistance organizations. Interviewees were identified based on consultations with multi-lateral development partners, civil society organization input, and open calls for participation by staff from the Ministry of Agriculture and Rural Development at Central and Provincial levels, and staff from the Department of Agriculture and Rural Development at the district level (see Table 1). To respect the anonymity of interviewees, they were codified according to type of organization, and interviews are cited based on this codification.

Interviews were conducted in person by the first author in Hanoi, Ho Chi Minh City, Da Lat in Lam Dong Province, Gia Nghia in Dak Nong Province, and two districts in each of the provinces. Interviewees were asked (1) questions on their operating context in relation to REDD+ (policies influencing behaviour, constraints, opportunities); (2) questions related to fragmentation such as what has been done in the past to affect driver pressures (what worked, what did not), what coordination exits (or not); and (3) questions related to policy integration which were tailored to their remit and role in REDD + and affecting drivers. The categories of the analytical framework outlined above was operationalised to analyse the interview material.

4. Mapping policy fragmentation

To achieve deforestation-free agriculture the Vietnamese NRAP has to negotiate a matrix of existing and emerging goals and objectives, actors, policymaking structures and processes, and policy instruments, engaged at various scales. The following map examines the degree of fragmentation within this multi-dimensional policy portfolio (Fig. 1).

4.1. Policy objectives/goals

Vietnam's national and sector climate commitments are reflected in its Nationally Determined Contribution to Paris Climate Agreement, as submitted to UNFCCC in October 2015. This commitment, which includes increasing forest cover from less than 40 % in 2010 to 45 % by 2030, is in line with the goals of the REDD + NRAP. Vietnam has increased its national forest cover since 1990, mainly with plantations and rubber plantations (Do 2015) and some natural forest, expanding from 9.4 million ha in 1990 to 14.8 million ha by 2015 (FAO, 2015). However, the quality of the forest has decreased, and mature natural forests decreased 13.5 % between 1995 and 2010 (MARD 2016).

Vietnam began REDD + readiness activities in 2009 and completed its first NRAP in 2012. Policy objectives to address drivers outside the forest sector in this first NRAP were lacking, along with any mandate to

Table 1
Summary of interviews.

Organization	Criteria for selection	Number interviewed
National government (MARD - VN Forest, Agriculture Department, VNFF, IPSARD, VCCB, MPI, CEMA, MOIT Export Department)	Deputy Director level or higher within MARD and other ministries related to forest protection, agricultural commodity production, commerce and trade, planning; Heads of departments within ministries, and other key roles (e.g. liaison between ministries, or policy lead)	16
Provincial government - Lam Dong and Dak Nong	Deputy Director level or higher in DARD and related Departments, heads of departments and sub-departments. Representatives of Provincial People's Committees.	
Lam Dong (Provincial People's Committee, DARD Agriculture Department, Forest Protection Management Board, Planning and Finance, Provincial Forest Fund)		9
Dak Nong (DARD Agriculture Department, Forest Protection Department, Environmental Protection, Ethnic Minority Steering Group)		8
District government - Lac Duong, Di Linh, Dak Song, Dak R'Lap, Dak Glong)	Heads of Agriculture and Forest Protection Departments, other related departments, District level People's Committee	
District level People's Committee, Agriculture Department, Department of Forest Protection, Ethnic Minority Department, Department of Natural Resources and Environment)		16
Banks and lenders (VBSP, Agribank, BIDV)	Deputy Director level or higher of National banks lending in the Central Highlands, agricultural development banks	3
Industry		
Rubber sector	Deputy Director level or higher within Vietnam rubber companies	2
Coffee - International roasters and Vietnamese coffee companies producing and sourcing in Central Highlands, traders	All the key companies, with emphasis on those with a major stake (particularly large traders and Vietnamese and international roasters)	8
Smallholder producers - cooperatives and farm-level associations	Lead representatives of cooperatives, identified with the assistance of district DARD officers and commodity producers operating in districts and provinces	5
Forest companies, forest associations and cooperatives	Lead representatives of companies or cooperatives with operations in key districts	4
National-level CSOs working in Central Highlands	Programme officer and Deputy Director levels	3
Bi-lateral assistance agencies, embassies, research and development assistance organizations	Programme staff identified based on active or recently completed programmes supporting the government of Vietnam	5
Total:		79

Policy integration via NRAP seeks to reduce fragmentation between policy goals, norms, and behavior, across scales, in order to reduce direct and underlying drivers of deforestation and forest degradation

Note: *Green* text denotes aspects already aligned with NRAP, whereas *blue* text denotes areas unaligned (areas requiring integration)
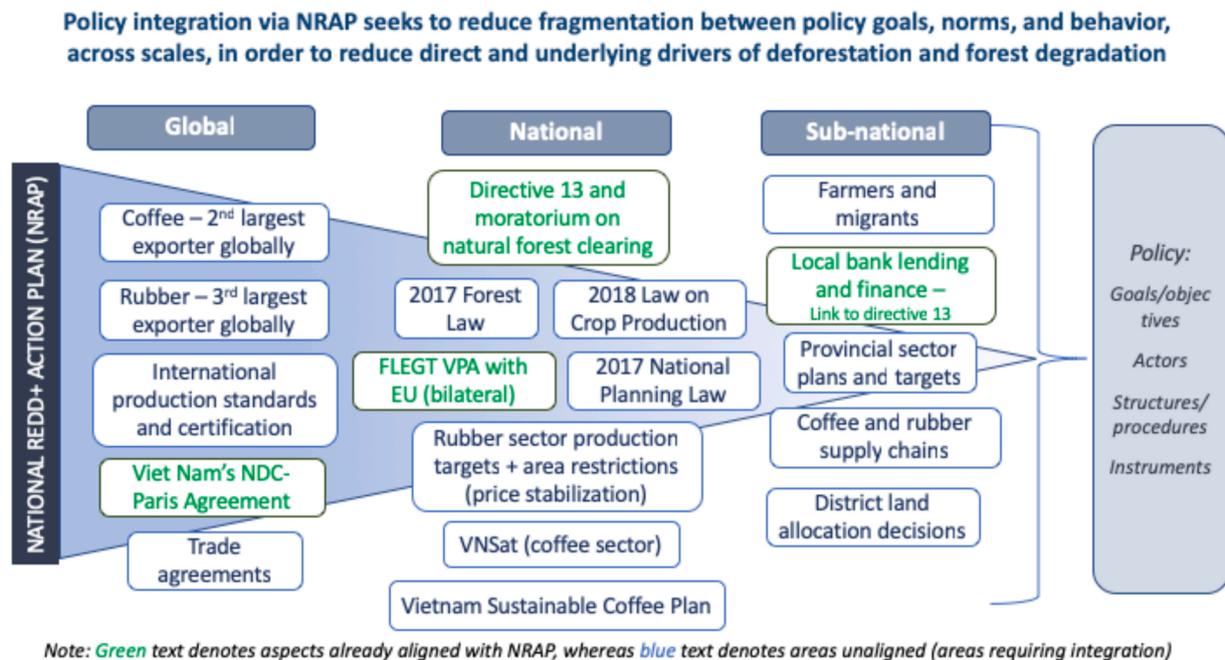
Fig. 1. Mapping fragmentation.

implementing Ministries to evaluate and reconcile trade-offs between any conflicting goals, based on the authors assessment of policy documents and affirmed by interviews. This indicates that the narrow scope of REDD + pre-2017 excluded sectors driving deforestation such as agriculture. In contrast the 2017 NRAP (Decision No. 419/QD-TTg of Prime Minister) clearly identified policies and measures intended to address the drivers of deforestation, especially those attributed to the expansion of rubber and coffee production, through the goal of 'deforestation-free agriculture'.

The increased ambition of the 2017 NRAP meant that the policy arenas it sought to address were far more fragmented and conflicting than in the 2012 NRAP by virtue of focusing on underlying drivers. For instance, the NRAP specifically recognised that, as the 2nd largest coffee exporter globally (behind Brazil), the expansion of smallholder coffee production was driven by global market demand. It also recognised that government policy at national, provincial and district levels sought to promote both coffee and rubber production and export, through sectoral laws, land allocation, access to finance and other means. However, the only attempt to address expanded production was through the 2017 Forestry Law (Government of Vietnam, 2017b), which mentions conversion and repurposing forest land, but provides no decision-criteria to guide decisions on the conversion and repurposing of forest land. The Forestry Law also does not include specific REDD + objectives, despite being finalised at the same time as the NRAP. Furthermore, the Law mandates forestry operations must comply with international agreements related to which Vietnam is a signatory (e.g. UNFCCC, Convention on Biological Diversity and so on), but does not provide guidance on how they should do so (Government of Vietnam, 2017b).

Other legislation also remains unaligned with the NRAP. For example, the 2018 Law on Crop Production (Law No. 31/2018/QH14) does not mention deforestation-free agriculture or the REDD + goals. Similarly the 2017 Planning Law, covering a ten-year planning period from 2021 to 2030, (with a vision to 2051) enables spatial and sector planning at Provincial and National levels (Government of Vietnam, 2017d). However, it does not provide clarity on how national target programmes, such as REDD+, relates to other policy goals related to poverty or sector growth plans. While the Planning Law does enable implementation of some NRAP activities, such as defining spatial distribution and targets for agricultural and forest land use, and defining

areas prohibited from exploitation, there are significant disconnects in terms of implementation.

Finally, other policies and programmes aimed at increasing the sustainability of the Central Highlands coffee sector have made no explicit reference to the NRAP goals. For example, neither the World Bank funded Vietnam Sustainable Agriculture Transformation (VNSat) programme from 2015 and 2020 aimed at improving agronomic and management practices, rejuvenate aging coffee trees and develop effective monitoring systems (World Bank, 2015), nor Vietnam's Sustainable Coffee Plan to 2020 and Vision to 2030, makes explicit reference to the NRAP or define how stabilizing plantation area (which could result in deforestation-free coffee production) will be achieved. The only policy document that is aligned with the REDD + goals outlined in the NRAP is the Voluntary Partnership Agreement signed in 2018 under the EU Action Plan for Forest Law Enforcement, Governance and Trade (FLEGT) (Government of Vietnam and European Union, 2018).

4.2. Policy actors

The revised 2017 NRAP identifies government policy actors, and details the roles and responsibilities of these actors. However, the focus of the NRAP remains largely on the Vietnamese state and excludes major international commodity buyers for coffee and rubber as well as local supply chains down to the district level.

The silence about these value chain actors is notable given the sustainability commitments of large international buyers of both commodities in Europe and Asia (Centre for the Promotion of Imports, 2019; Michelin Tire Company, 2016). For example, large international roasters and traders buying coffee in the Central Highlands, including Nestlé, Jacobs Douwe Egberts and Lavazza, were not targeted by the NRAP process despite their key role in shaping coffee market demand. In addition, the contributions that corporate-led solutions could provide, e. g. through their promotion of sustainability solutions such as deforestation-free purchasing, are dependent on the Vietnamese state given the legal constraints on foreign-owned companies sourcing directly from farmers (Government of Vietnam, 2013). This has limited their ability to develop traceable value chains to the farm level which is a key prerequisite for voluntary certification and to demonstrate deforestation-free purchasing (Interview, Industry sector).

At more local scales, the small holders upon whom both the coffee and rubber sectors depend have also not been incorporated into deforestation-related policy interventions to date (Interview, Smallholder producer 2 and research organization 2). While smallholders account for 88 % of production and is comprised of 600,000 households, smallholders capture the least benefit of all actors, and their share in profits is marginal (Nguyen Thi Thuy Hanh, 2018). Furthermore, the lack of co-operation between the supply chain actors and these small-holders has undermined the effectiveness of the commitments made by both domestic and international buyers (Interview, Industry sector 7).

4.3. Policy structures and procedures

The 2012 NRAP set a clear objective for coordinating policy structures and procedures across policy domains and sectors. The plan highlighted the need to "Develop [a] mechanism to facilitate the coordination among state administrative agencies at all levels which are involved in REDD+, especially between agriculture and rural development and natural resource and environment departments in the development and implementation of REDD+" (Government of Vietnam, 2012, p. 7. Despite recognising this need, however, no clear policy goals and objectives defining a new mandate of relevant agencies within the government were subsequently developed. Administratively, REDD + was promoted from the Forest Department, without coordination with other Departments within MARD from the national to district level levels (Interview, development assistance organization 1). This resulted in significant fragmentation of policy implementation over the years, observable through the failure to implement spatial planning for different commodities aimed at reducing forest encroachment and deforestation.

4.4. Policy instruments

The Forest Law defined policy instruments, including decisions and circulars, aimed at reforming land allocation. However, some of these decisions created rather than reduced policy fragmentation. For example, a decision approving the conversion of natural forest on plots of land less than 200 ha was authorised as a provincial level decision with no central level input or monitoring. This decision removed national oversight further fragmenting how authorization is implemented at the national level (To Xuan and Tran Huu, 2014). As a result of these and similar misalignments between the national and provincial policy implementation, wood product exports continued to increase by 10.2 % between 2016–2017 (Customs News, 2018); though some of this increase is attributed to increased imports and manufacturing of wood products in Vietnam, which is destined for export (To Xuan et al., 2016).

Also apparent is that Ministerial Directives seeking to limit the expansion of land allocated to agricultural commodities were not able to counter the high commodity prices in export markets driving this expansion. To illustrate, recognizing that high prices for rubber were causing rapid encroachment onto forest land, the government released Decision No. 750/QD-TTg in 2009 limiting the area under production to 800,000 ha by 2020. By 2015, however, the total area of rubber cultivation was 981,000 ha (Government of Vietnam, 2015). Respondents from MARD and Provincial DARDs agreed that the failure of Decision No. 750/QD-TTg was due to the combined effect of poor coordination between the national and provincial levels leading to the authorization of expanded rubber production and private speculation on rubber prices (Interview, National government 14 and Provincial government 7). A subsequent Directive in 2011 (No. 1685 / CT-TTg of 2011) called for the evaluation of land conversion of forest land. The review found that the area planted fell far short of the goals identified in the original investment certificates, indicating some actors cleared land and sold the trees (e.g. conversion timber), but never followed through on establishing plantations (Dak Nong DARD, 2018; Lam Dong DARD, 2013). Following

the these findings the government released a final Directive in 2016 (No. 191/TB-VPCP) committing to halt the expansion of rubber plantations altogether.

The mitigation of deforestation caused by the expansion of coffee cultivation also relied on area-based targets in the 1990s. As seen with rubber, however, these targets failed, with a 77 % increase between 1995 and 2000 (USAID LEAF, 2013). The government subsequently promoted the use of international certifications to address the impact of coffee on deforestation. For example, the The Sustainable Coffee Plan to 2020 and Vision to 2030 aims to have 80 % of coffee production by area to comply with certification standards such as UTZ, 4C Rainforest Alliance, and VietGAP (Government of Vietnam, 2014). However, respondents from the government and private sector estimate that this figure has fallen to approximately 20 % due in large part to international buyers not being willing to pay the price premium for certified coffee (Interviews, research organization 3, industry 6 and smallholder association 2). Furthermore, certification standards were not seen to address the pressing sustainability issues that are beyond the farm-unit, including water scarcity and agrochemical (pesticide and fertiliser) use (Ho et al., 2018; Byrareddy et al., 2019).

5. Assessment of integration

The NRAP aimed to promote integration through policy responses that addressed the drivers. This section explores 'what is integrated into what, and with what effects,' through individual components of the policy arena—goals and objectives, actors, policymaking structures and processes, and policy instruments, engaged at various scales. In doing so we consider the degree to which policy integration activities promotes or hinders the goals of reducing emissions from deforestation and forest degradation.

5.1. Policy objectives/goals

Despite the high degree of fragmentation outlined above, the 2017 NRAP makes policy integration a key goal. The NRAP explicitly recognises the need to ensure consistency in state steering, management and coordination by a range of policy domains that "contribute to the implementation of sustainable forest development" (Government of Vietnam, 2017a, p. 2. These domains are also impressively diverse including national strategies responding to climate change, green growth, sustainable development, environmental security and poverty reduction. The NRAP also outlines key action points which reinforce the ambition for integration, such as reviewing and adjusting the land use plans to secure 16.24 million hectares of forest land by 2020, promote sustainable and deforestation-free agriculture and aquaculture, improve forest governance and livelihoods for people living near and in the forest and strengthen law enforcement.

These ambitions for policy integration were not, however, translated into an explicit plan identifying which goals, instruments and procedures would be actually be integrated. Instead these decisions were left to the discretion of ministries during implementation. For example, the Ministry of Planning and Investment is instructed in the NRAP to, "mainstream REDD + into relevant national target programmes" (Government of Vietnam, 2017a, p. 10, but the NRAP does not provide guidance for overriding sector targets or reconcile conflicting mandates with other ministries. It instead generally advises the government to "review, amend, supplement and improve legal documents on land, forestry, finance, environment protection, safeguards of REDD + implementation and other relevant legal documents in accordance to Vietnam's law and international regulations and practice" (*ibid*, p. 5.

Such guidance is complicated by the range and degree of fragmentation between existing policies and directives, such as the Rubber Development Strategy, Vietnam Sustainable Agriculture Transformation (VNSat) progamme for the coffee sector, Sustainable Coffee Plan to 2020 and Vision to 2030, as outlined above. The NRAP does stipulate how

these policies and directives should be rewritten to be compliant with REDD + objectives. It instead advises the Prime Minister to "assign specific duties, direct and enhance the coordination among the Ministries and promote the role of socio-political associations" (*ibid,* p. 9 in achieving policy integration.

5.2. Policy actors

Though a large number of actors and scales have so far been omitted from policy processes, the 2017 NRAP promotes the participation of political, social and professional organizations, mass organizations, non-governmental organizations and business entities "subject to their functions, tasks and capabilities" (Government of Vietnam, 2017a, p. 12). Most attention in practice, however, has gone to those organizations able to support and mobilise local communities and monitoring and assessing the implementation of REDD+ (Government of Vietnam, 2017a).

The role of private sector has been relatively limited to funding commodities forums to facilitate dialogue and transition towards more sustainable (deforestation-free) production. However, exactly how these private actors are encouraged to change behavior and investments, thus integrating the NRAP into their business plans, has not been stipulated. Nevertheless, there do appear to opportunities for more coherent integration of these private actors. For example, the Chinese Chamber of Commerce of Metals, Minerals and Chemicals Importers and Exporters (CCCMC) developed voluntary guidelines for natural rubber in 2017 that are substantively aligned with the goals of REDD+ - setting goals for conserving biodiversity and fulfilling Zero Deforestation principle (China Chamber of Commerce of Metals, Minerals and Chemicals Importers and Exporters, 2017 CCCMC, 2017). In practice, however, there is little information on how Chinese companies are implementing these provisions (Interviews, Industry 1 and research organization 3), nor is there discussion within the Vietnamese government or rubber sector on how to integrate or mainstream these provisions in Vietnamese policy (Interview, National government 16). More speculatively, there also appear to be opportunities to link public commitments to zero deforestation by other major tire manufacturers (Bridgestone Group, 2018; Pirelli, 2017; Michelin Tire Company, 2016) that are not yet sourcing from Vietnam directly, but instead from other markets like China that import from Vietnam.

5.3. Policy structures and procedures

The 2017 NRAP directs MARD to coordinate with the Ministry of Natural Resources and Environment (MONRE) and other relevant Ministries once per year. Such an exchange holds the potential to translate into better integration between policy objectives of these Ministries. However, guidance of the NRAP remains procedural in scope; limited to a review of budget allocation and integration of implementation plans of the National Target Programme on Climate Change (and other programmes) related to REDD+ (Government of Vietnam, 2017a).

In practice the substantive integration of REDD + into the land use plans of different sectors is dependent on the hierarchical planning structure of the Vietnamese government. At the national level, each sector submits a land-use plan to MONRE, which then elaborates both the national master land-use plan and 5-year land-use plan. Land-use planning is based primarily on existing land use, the demand for land from the different sectors, and new priorities under Socio Economic Development Plans. However, this process provides little opportunity, due to limited analysis and budget (Government of Vietnam, 2017c), to examine trade-offs and compromise across sectors, which is critical for delivery of REDD + and cross-sectoral integration.

The NRAP does, nevertheless, promote a coordination mechanism by giving a mandate to multiple government ministries and departments to evaluate and reconcile complex trade-offs between sectors affecting deforestation. However, the 2017 Planning Law has precedence over the 2017 NRAP. This means that the delegation of tasks in the 2017 NRAP to MONRE to "lead on land-use planning and land management, including the forest land, and on integrating REDD + into land-use planning practice at all levels"(Government of Vietnam, 2017a, p. 10) are in practice taken up by the Ministry of Justice and Ministry of Planning and Investment (MPI) under the Planning Law (Government of Vietnam, 2018). Similarly, the NRAP tasked MPI with "allocating resources for the Programme according to the approved plans" (p. 10). But in practice MPI holds a lead role in issuing guidelines on procedures and methods of planning for integrated land use planning, also in response to climate change and ecosystem services. This, according to an MPI official affords MPI a key integrating role within the government (pers. comm.).

The NRAP also directs the Provincial People's Committees to "Develop provincial REDD + Action Plans to implement the National REDD + Action Programme locally" (Government of Vietnam, 2017a, p. 12). However, the scope of integration intended through this locally coordinated action is limited, as it relates only to the provincial Forest Protection and Forest Development Plans. The NRAP does not encourage integration of forest protection and development into the plans of the sectors driving deforestation, such as rubber and coffee.

5.4. Policy instruments

The 2017 NRAP promoted deforestation-free agriculture, but did not specify the instruments to achieve that that goal; though it is broadly understood that previous policies seeking restrict agricultural commodity expansion based on area-based targets have failed (Interviews, National government 3, 10 and district government 5, 9, 12). Despite this, however, the Vietnamese government has developed a series of decisions and circulars that do support a degree of integration between policy instruments.

The Communist Party's Directive 13 released in 2017 (Central Committee of the Communist Party of Viet Nam, 2017) was the first Party directive aimed at strengthening leadership in forest management, protection and development. Directive 13 seeks to retain natural forest, emphasizing the coordination and accountability of related ministries, and international cooperation, as a means to achieve such leadership. The Directive does not mention REDD + explicitly. However, it is implicitly aligned or integrated with the goals of REDD + and the goals and objectives of the NRAP.

Directive 13 builds directly on Prime Minister's Notice 191, passed in 2016, which placed a moratorium on any new clearing of natural forest. Notice 191 is also not mentioned in the NRAP. However, respondents from provincial government and the private sector argued it as the most effective policy directive on forests in the Central Highlands because it has been integrated into land allocation decisions at district and provincial levels, and into due diligence practices of the Vietnam Bank for Social Policies (VBSP), Vietnam Bank for Agriculture and Rural Development (VBARD), and the Bank for Investment and Development of Vietnam (BIDV) all of which screen for the risk of deforestation in loans to both the rubber and coffee sectors. Loan officers at the commune or district level monitor the farmers, and if evidence of deforestation is found, loans will not be extended, and previous loans will be recalled (Interviews, Bank and lender 1&2). This is visible in both the coffee and rubber sectors, and beyond bank lending, there is indication it is influencing Provincial decisions on land allocation.

6. Discussion and conclusion

Our results show that neither the 2012 or 2017 NRAP managed to integrate policy related to the direct and underlying drivers of deforestation and forest degradation such that a new mandate or logic emerged that either subordinated previous and/or competing objectives (following Cejudo and Michel 2017). As our analysis of the coffee and rubber sectors demonstrate, achieving integration to the level aimed for by the NRAP requires the policies of numerous government and sector

priorities be completely revised (as indicated by the blue text boxes in Fig. 1). The 2017 revisions to the NRAP did attempt to incorporate policy from key sectors driving deforestation and open up the possibility for defining pathways for policy integration that appear essential for achieving REDD + outcomes. However, because the NRAP was not given a 'whole-of-government' mandate, it was not effective in integrating its objectives into the targets and goals for the agricultural sector and the 2017 Planning Law - two key areas of planning and regulation. As a result the NRAP had no clear means to reform existing policies and programmes in a way that could reach and affect the policy goals, actors and structures of sectors like coffee and rubber that underly many of the drivers of deforestation and forest degradation.

These results also highlight the challenge of integrating a global governance instrument like REDD + or Vietnam's forest sector component of its Nationally Determined Contribution to Paris Climate Agreement into national and sub-national policy. Despite being designed to ensure greater consistency in how the state steers, manages and co-ordinates activities across multiple sectors, the NRAP has no mandate to override or influence policy goals and objectives that are not directly related to the forestry sector. This means that key actors, especially those outside government and in sectors contributing to the *underlying* drivers of deforestation remain largely unaffected by REDD + . As a result, the policies and procedures affecting the conduct of these actors remain highly fragmented between sectors and across multiple levels of government. Our analysis across these multiple levels of government reveals four ongoing 'fragmentations' that would need to be overcome for NRAP to affect integrative change.

First, for the NRAP to foster integration, both vertically between different levels of levels of government, and horizontally between sectors and types of instruments (see Howlett et al., 2015), it would have to directly insert itself into the 'coordinating' administrative and legislative functions of the state (cf. Kim Dung et al., 2017). In the case of the centralised, 'mono-organisational Vietnamese state (Thayer 1995), this equates to the Ministry of Planning and Investment and the Planning Law of 2017. This appears to be one of the only ways in which the NRAP could gain the mandate required to influence the work plans of different parts of Vietnamese state responsible for sectors driving, both directly and indirectly, deforestation and forest degradation.

Second, to foster integration the mandate of the NRAP would have to extend to the revision of both agricultural commodity development strategies (such as those for rubber and coffee) and the centrally coor-dinated 5-year Socio-Economic Development Plan. Doing so would further enable the NRAP to adopt an integrated whole-of-government approach that would make the revision of other sector mandates to, for instance, block their expansion into natural forest areas, and ensure that such goals could be carried through the policy process by influ-encing diverse actors with clear structures and procedures. As outlined above, the Vietnamese moratorium on natural forest clearing (Prime Minister's Notice 191 of 2016) provides a precedent for such an approach, having achieved a high degree of integration of (1) land allocation decisions at district and provincial levels, and (2) aligning these decisions to the lending practices of state owned banks. However, Notice 191 never sought to coordinate or integrate with other sectors.

Third, a multi-level whole-of government mandate to NRAP would also enable it to reshape priorities of other sectors. Currently the NRAPs mandate is more akin to environmental policy integration, seeking 'principled priority' in relation to sectoral policy objectives (Jordan and Lenschow, 2010). Our analysis illustrates how the NRAP was unable to exert any such principled priority, which is heavily restricted in its ability to place demands on the objectives and goals of other sectors like rubber and coffee - let alone define policy instruments in those sectors that can reach the key actors and scales necessary. It remains unclear whether such a whole-of-government mandate could have an influence on strong market pressure from those sectors driving forest conversion – as evident by the inability of pre-existing policy tools to affect commodity-area overshoots.

Finally, as the NRAP was not able to bring about a new mandate or logic across the fragmented policy landscape in which it sought influ-ence, directly influencing agricultural sector targets and programmes, the 'integration' sought may be better characterised as 'pragmatic co-ordination' (Hogl et al., 2016). That is, it was aimed at making incre-mental linkages between existing policies, actors and instruments rather than seeking to change political will (see Kellow 2012). While the effectiveness of coordination (as opposed to integration) can be ques-tioned in terms of whether it exerts enough influence on competing or conflicting mandates, it does draw attention to the practical challenges of what needs to be coordinated and towards what end. Following McElwee (2016), this raises questions about the very real limitations of affecting policy objectives and goals, and the subsequent phases in the policy process, when the emphasis is on the administration of planning and budgetary processes, rather than social and environmental outcomes.

Overcoming fragmentation in highly complex environmental prob-lems is often framed as an intuitively 'right' thing to aim for. But in practice it remains highly challenging. This is precisely the case in the context of REDD+, where the degree of integration needed to cover the full range of both direct and underlying drivers is deemed necessary but remains an overwhelming task. We conclude that integrative multi-level and cross sectoral approaches for addressing these drivers can be at least partially addressed if the scope of policy goals and objectives are ambitious and well defined from the outset (see also (Hogl et al., 2016); Park and Youn, 2017). However, we argue that this can only be achieved if greater attention is given to clarifying which actors, policymaking structures and processes, and policy instruments can in fact be inte-grated with what, at what level and over which time line. Having said that, policy integration needs more than effective public administration. It also requires integration to affect the wider political economy of in-ternational timber and agricultural trade and investment that ultimately drive deforestation and affect domestic resistance to change away from the current business as usual in Vietnam's land sector (building on Clapp and Scott, 2018). In short, policy integration may not be able to halt deforestation if there is no political will to engage the interests driving the underlying drivers across sectors and levels of governance.

Declaration of Competing Interest

The authors report no declarations of interest.

Acknowledgements

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