

Timber Legality Risk Dashboard: Cameroon

Drafted as of: August 2024

SUMMARY OF LEGALITY RISKS

Risk Score: 81.7 (Higher Risk^a)¹

Conflict State: YES (Medium Intensity Conflict)²

Log Export Ban in Effect: YES³
Import Regulation in Effect: NO

- Cameroon's annual rate of forest loss hit its highest level in 2023. From 2001 to 2023, Cameroon lost more than 2 million hectares (ha) of tree cover, equivalent to a 6.5 percent decrease in tree cover since 2000.
- Illegal logging and forest conversion remain prevalent issues in Cameroon. Numerous reports have highlighted ongoing illegal
 activities, particularly involving high-value timber species. A recent 12-month investigation conducted by the Pulitzer Center and its
 partners further documented these illegal logging and associated trade practices.
- Cameroon's ports act as a central shipping hub for timber-producing countries across West and Central Africa, complicating supply
 chains and origin labelling. The port of Douala has also been identified as a center for organized crime and illicit exports, including
 activities associated with the Russian Wagner Group, which is currently under U.S. sanctions.
- Challenges in Cameroon's forestry sector have limited its production mainly to basic wood products like roundwood and sawn wood.
 Cameroon has increased log export taxes and is considering a full export ban. In the meantime, the country has already banned the export of numerous species in log form, though the system is complicated by exceptions and quotas.
- In 2021, 55% of Cameroon's forest products were exported to countries with regulations prohibiting the import of illegally sourced
 wood, an increase from 38% in 2019. Recent investigations have uncovered widespread illegalities in specific supply chains,
 particularly concerning timber trade flows between Cameroon and China, as well as Cameroon and Vietnam. However, there are
 ongoing concerns about illegal timber entering other international markets as well.
- Significant efforts have been made to improve traceability and transparency in the forestry sector, but third-party legality verification systems have yet to achieve widespread adoption or scale

TRADE PROFILE OF FOREST PRODUCTS^{b,c,4}

Total Imports (2021): \$139.96 million **Total Exports (2021):** \$758.83 million. \$417.67 million (55.0%) exported to "regulated markets"^d

SUMMARY OF HIGHEST PRODUCT-LEVEL RISKS

Exports - Top Products Exported to the US by 2021 Value⁵

- Sawnwood (HS4407)
- Logs (HS4403)
- Veneer (HS4408)

Cameroon has banned the export of logs of certain protected species since 1999, and expanded this list in recent years. ^{6,7,8} Furthermore, additional restrictions have reportedly existed for sawnwood exports since 2000, with sawnwood of 15cm thickness or more being prohibited for export. ⁹ Cameroon, as one of the six Central African Economic and Monetary Community (CEMAC) members committed to jointly ban exports of logs, originally to start January 1, 2022 but delayed several times. ^{10,11}

SUMMARY OF HIGHEST SPECIES-LEVEL RISKS

Illegal logging and trade affect many timber species, but highly valuable - often rare and endangered - species that are protected under harvest and/or trade regulations are a key target and at an elevated risk for illegality. The following species are either currently, or have recently, been protected in Cameroon.

CITES-Listed Species (Appendix II):

- Afrormosia (Pericopsis elata) African cherry (Prunus africana)
- Bubinga (Guibourtia desmeusei, Guibourtia pellegriniana, Guibourtia tessmannii)
- Rosewood (Dalbergia spp.)
- **Doussie** (Afzelia spp. including Afzelia africana, A. bipindensis and A. pachyloba)
- African mahogany, acajou d'Afrique (Khaya spp. including Khaya ivorensis. K. senegalensis)
- Padauk, kosso (Pterocarpus spp. including Pterocarpus erinaceus, P. soyauxii)

The following species are prohibited for export in log form: 12,13

- Abale/ abing/ essia (Petersianthus macrocarpus)
- Abam a poils rouge/ red abam (Gambeya lacourtiana)
- Abura/bahia (Mitragyna stipulosa)
- Acajou a grande folioles/ dalehi (Khaya grandiflora)
- Acajou blanc / white mahogany / mangona (Khaya anthotheca)
- Acajou de bassam /ngollon (Khaya ivorensis)
- Agba/tola/sidong (Prioria balsamifera)
- Aiele/abel (Canarium schweinfurthii)
- **Ako/aloa** (Antiaris toxicaria)
- Alep (Desbordesia glaucescens)
- Alumbi (Julbernardia seretii)
- Amvout/ekong (Trichoscypha acuminata)
- Andok ngoe (Irvingia grandifolia)
- Angueuk (Ongokea gore)
- Aningré A/ aniégré (Aningeria altissima)
- **Aningre R** (Aningeria robusta)
- Asila koufani/ kioro (Maranthes glabra)
- Asila omang (Maranthes enermis)
- Assamela/ afrormosia / obang (Pericopsis elata)
- **Avodire** (Turraeanthus africanus)
- **Ayous/obeche** (*Triplochiton scleroxylon*)
- Bete/mansonia (Mansonia altissima)
- Bodioa (Anopyxis klaineana)
- Bosse clair/ bright bosse (Guarea cedrata; G. laurentii)
- Bosse fonce /dark bosse (Guarea thompsonii)
- Bubinga rose (Guibourtia tessmannii)

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- **Bubinga rouge** (Guibourtia demeusei)
- Cordia/ebe/mukumari (Cordia platythyrsa)
- **Dambala** (Discoglypremna caloneura)
- Diana/ celtis/ odou (Celtis spp.)
- Dibétou/bibolo (Lovoa trichilioides)
- **Difou** (Morus mesozygia)
- Doussie blanc/ white doussie/ pachyloba (Afzelia pachyloba)
- Doussie rouge /red doussie/Pipendensis (Afzelia africana; A. bella; A. bipindensis)
- Ekaba/Ekop Ribi (Tetraberlinia bifoliolata)
- Emien (Alstonia boonei)
- Esseng/ lo (Parkia bicolor)
- Essak/ alow kouaka (Albizia glaberrima)
- Essessang (Ricinodendron heudelotii)
- Esson/kivala (Stemonocoleus micranthus)
- **Etimoé** (Copaifera spp.)
- Faro (Daniellia thurifera)
- Framire (Terminalia ivorensis)
- Fromager/ ceiba (Ceiba pentandra)
- Ilomba (Pycnanthus angolensis)
- Iroko /abang (Milicia excelsa)
- Kanda (Beilschmiedia anacardioides)
- Kapokier/ bombax/ essodum (Bombax buonopozense)
- Kumbi / ekoa (Lannea welwitschii)
- Lati parallele (Amphimas pterocarpoides)
- Longhi/abam (Gambeya spp.)
- Makore/ douka (Tieghemella spp.)
- Mambode/ amouk (Detarium macrocarpum; D. senegalense)
- Moabi/ adjap (Baillonella toxisperma)
- Movingui (Distemonanthus benthamianus)
- Mukulungu (Autranella congolensis)
- Okoume (Aucoumea klaineana)
- Osanga/ sikong (Terminalia hylodendron)
- Ouochi/ albizia/ angoyeme (Albizia zygia)
- Ovengkol/ bubinga E (Guibourtia ehie)
- Ovoga/ angalé (Poga oleosa)
- Padouk blanc/ white padouk (Pterocarpus mildbraedii)
- Padouk rouge/ red padouk (Pterocarpus soyauxii)
- Pao rosa (Bobgunnia fistuloides)

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- Sapelli (Entandrophragma cylindricum)
- **Sipo** (Entandrophragma utile)
- **Teck** (Tectona grandis)
- **Tiama** (Entandrophragma angolense; E. congoense, E. excelsum)
- Vessambata (Oldfieldia africana)
- Wamba (Tessmannia africana)
- Wenge (Millettia laurentii)
- Zingana/ amuk. (Microberlinia bisulcata; M. brazzavillensis)

All tropical hardwood log exports should be considered high risk based on overall legality risk in Cameroon. Robust third-party certification can be considered as a tool to help mitigate this high risk but should not constitute sufficient due diligence for legality in and of itself.

FORESTRY SECTOR

Forested Area: 18.8 million ha (56% protected)¹⁴

Deforestation Rate: 0.27% annually¹⁵ **Forest Management (as of 2015):**¹⁶

• 20.62 million ha publicly owned (100%)

Certified Forests:

• FSC Certification: 1.3 million ha (2023)^{17,18}

OLB (Bureau Vertias) Certification: 891,629 ha (2024)^{19,e}

• NEPCON LegalSource Certification: 400 thousand ha (2019)^{20,f}

Domestic Production (2022):21

• Wood Fuel: 10.88 million m3 (2022)

• Logs: 3.37 million m3 (2022)

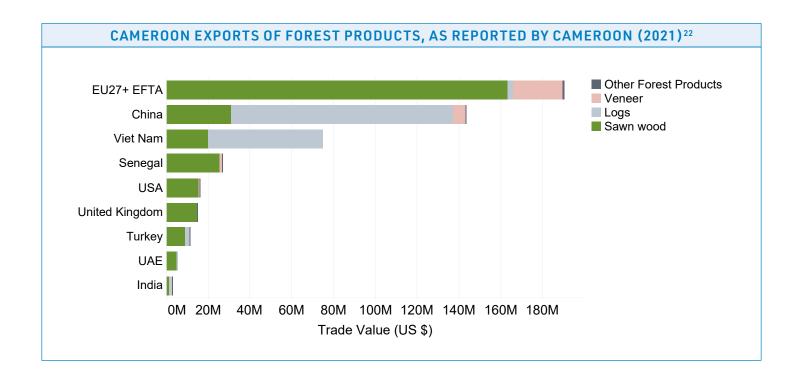
Sawnwood: 1.37 million m3 (2022)

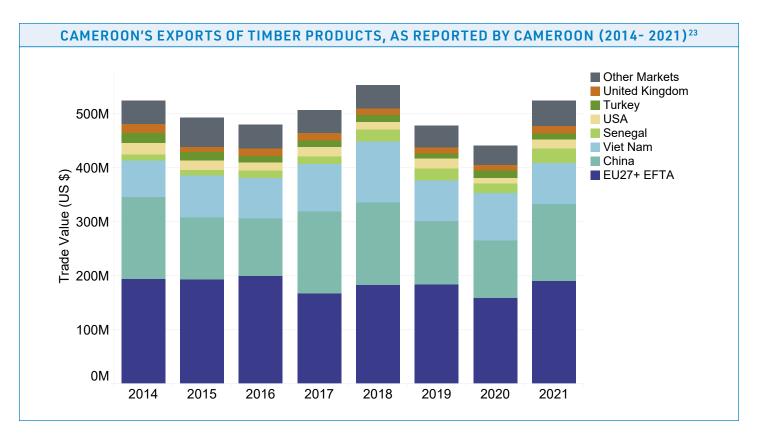
• Veneer: 91 thousand m3 (2022)

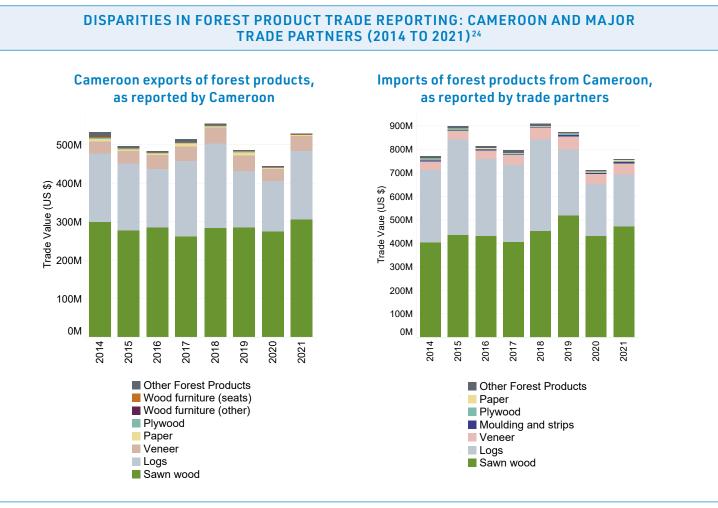
Plywood: 18 thousand m3 (2022)

Wood Chips: 16 thousand m3 (2022)

Charcoal: 541 thousand metric tonnes (2022)







HIGH-RISK TR ADE: GLOBAL IMPORTS OF CAMEROONIAN LOGS IN YE ARS IN WHICH CAMEROON HAD AN ACTIVE LOG EXPORT RESTRICTIONS, BY COUNTRY OF IMPORT (2014-2021)^{25,26} Other markets 400M France Italy Bangladesh 350M Turkey India Viet Nam 300M China Trade Value (US \$) 250M 200M 150M 100M

50M

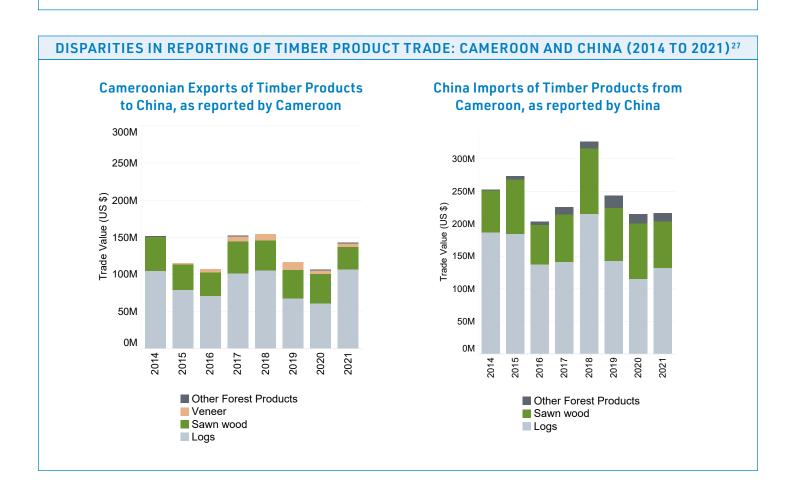
0M

2014

2015

2016

2017



2018

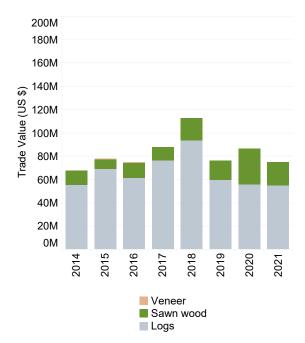
2019

2020

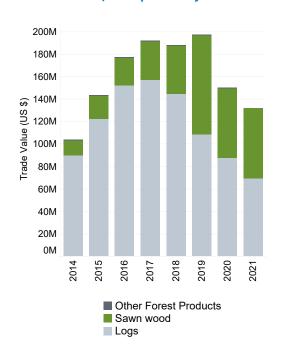
2021

DISPARITIES IN REPORTING OF TIMBER PRODUCT TRADE: CAMEROON AND VIETNAM (2014 TO 2021)²⁸





Vietnam imports of timber products from Cameroon, as reported by Vietnam



TIMBER LEGALITY

Cameroon's forest area is estimated at 20.3 million hectares or 43 percent of the total land area. Annual forest cover loss hit its highest record in 2023. From 2001 to 2023, Cameroon lost more than 2 million hectares (ha) of tree cover, equivalent to a 6.5 percent decrease in tree cover since 2000.30

Natural forests account for 99.7 percent of the forest area with the most widely occurring species including ayous/obéché (*Triplochiton scleroxylon*), sapele/sapelli (*Entandrophragma cylindricum*), tali (*Erythrophleum ivorense*), ilomba, (*Pycnanthus angolensis*), azobé/ bongossi (*Lophira alata*), fraké/limba (*Terminalia superba*), movingui (*Distemonanthus benthamianus*), dabéma/atui (*Piptadeniastrum africanum*), iroko (*Milicia excelsa*) and padouk rouge (*Pterocarpus soyauxii*).³¹ The Biafran forest, near the Gulf of Guinea, is a low altitude coastal forest, and home to frequently harvested species, such as azobé and ilomba. Sapele/ sapelli and sipo (*Entandrophragma utile*) tend to be harvested from Cameroon's dense tropical forests in the south and eastern regions of the country.^{32,33}

Forest plantations account for just 61,100 hectares or 0.3 percent of the forest area. Species such as teak, ayous, eucalyptus, pine (western and central regions), rubberwood and even some azobé (*Lophira alata*) have been reportedly introduced in plantations with varying degrees of success. Sp. 35,36

Cameroon has a long tradition of commercial logging, with the forestry sector representing 12.2 percent of exports and contributing 3.8 percent of FDP in 2021. The forestry value chain is the third highest provider of export revenues in Cameroon after the cocoa and hydrocarbon sectors.³⁷

Most of Cameroon's forest areas have been permanently designated for long-term forest production or conservation, while the rest is intended for community forestry, a concept initially introduced in the 1994 Forest Law allowing forests outside the permanent estate to be divided and managed by communities or villages. As of May 2024, Cameroon had 705 communal forests, with 330 definitively allocated and 305 provisionally allocated. However, many forest-dependent

communities still struggle to obtain licenses for community forests, and less than half are fully operational. Despite government efforts to support community forestry, issues such as legal shortcomings, weak enforcement, limited rights, transparency issues in revenue sharing, and inadequate management skills persist.³⁹

Logging in Cameroon takes place in forests classified as Permanent Forest Domain (PFD) and Non-Permanent Forest Domain (NPFD). The PFD is composed of Forest Management Units (FMU), council forests, protected areas and forest reserves. The NPFD includes community forests, Sales of Standing Volumes (SSV, "ventes de coupe"), timber and recovery permits. In practice, most of the declared timber harvested in Cameroon originates from either FMUs or SSVs. The most significant differences between these two production regimes are that SSVs are considered short-term logging titles of up to three years which allow harvesting of a forest area of up to 2,500 hectares. SSVs do not require a forest management plan. Hulls or concessions, in contrast, are awarded through public calls for tender with an inter-ministerial committee review of the bids and allocated for a duration of 15 years with the ability to renew once for another 15 years. As of 2019, Cameroon had granted 120 FMUs, totalling roughly 7.1 million hectares. At that time, 65 percent of the active concessions had approved forest management plans. FMU logging agreements require companies to make specific investments to guarantee that their operations are sustainable, via developing and implementing a forest management plan. To Cameroonian law also requires that a percentage of the area-based Annual Forestry Royalty paid by companies in both FMUs and SSVs must be redistributed back to local communities. For SSVs, a proportion of volume-based stumpage fees should also be paid to local communities.

Illegal logging and forest conversion have been widely reported in Cameroon.

In practice, most of the declared timber harvested in Cameroon originates from either FMUs or SSVs. The most significant Cameroon ranks low on Transparency International's Corruption Perception Index for 2023 at 140/180.⁴⁹ Rule of law, corruption, regulatory quality, and accountability remain problematic undermining the effectiveness of government policy. Weak governance and institutions, including inconsistent enforcement of laws and regulations persist with reports of bribery, nepotism and corruption rife in almost all sectors of the economy.⁵⁰

A 2023 12-month investigation by the Pulitzer Center found that, despite Cameroon's efforts to combat illegal logging, corruption speeds up illegal logging in Cameroon, to the detriment of indigenous forest communities. ⁵¹ Investigators reported laundering of illegal wood, cutting beyond allowable logging permits, limited enforcement including at transport check stations, repeated missed fine payments, and the involvement of locals who sell high-value species to logging companies. ^{52,53} From 2015 to 2020, the Cameroon Ministry of Forestry and Wildlife, through the national forest brigade, sanctioned about 27 companies for irregularities regarding forest exploitation within small-scale logging titles, but many of them continue to receive logging titles. According to a report by the National Agency for Financial Investigation published in 2021, illegal logging and wildlife exploitation result in a loss of revenue of about 33 billion CFA francs (US\$55 million) each year. ⁵⁴

There are divergent opinions about the scale of illegal logging rates. ^{55,56,57} Carodenuto and Cerutti (2014) suggest that the perceived rates of illegal logging have fallen considerably in the past decade, due in part to the international response to illegal logging, while several NGOs have suggested that rates have actually increased. ^{58,59} In 2015, Chatham House estimated that as much as 65 percent of the total timber production is illegal. ⁶⁰ This is significant given that Cameroon has become one of the leading exporters of timber products in the Congo Basin and Africa, ⁶¹ following a period of growth in national production, which has, at least in part, resulted from the allocation of small forest titles, in particular the SVVs which are reportedly prone to illegal practices. ⁶²

NGOs have documented corruption and illegalities tied to the allocation of SSV permits as highly destructive and illegal practices associated with logging in SSVs. ⁶³ Greenpeace reports that SSVs are typically used as "cut and run" titles with the timber exploited very rapidly. ⁶⁴ Illegal logging in SSVs has also been reported by independent observers, with the most frequently cited illegalities including logging outside the boundaries of the SSV and then laundering the timber into the supply chain by declaring that the wood originated from within the SSV. ^{65,66} As such, illegal logging is facilitated by poor inventories, leading to overestimated logging quotas and more importance being placed on timber transportation permits rather than the quantities of wood actually available in the plots. ⁶⁷ The biggest issue related to forest conversion in Cameroon is reportedly agro-industrial plantations. ⁶⁸ Illegalities in the allocation of permits for timber extraction linked with development projects including agribusiness plantations have also been documented. ⁶⁹ Community forests, which in some cases have brought improved forest conservation and livelihoods, have also been linked with reports of illegal logging. ⁷⁰

Reports suggest that extensive bribery takes place among senior officials, civil servants and companies in return for logging permits which fuels illegal logging.⁷¹ Cameroon's Penal Code criminalizes corruption, bribery, extortion, and

bribery of foreign public officials. Corruption is punishable by a prison term, a fine and/or asset seizure but insufficient implementation of anti-corruption legislation coupled with impunity among public officials has reportedly exacerbated the levels of corruption in the country. 72 State officials allegedly collect more than EUR 46 million in bribes per year from illegal logging practices. 73

 Cameroon's ports act as a central shipping hub for timber-producing countries across West and Central Africa, complicating supply chains and origin labelling. The port of Douala has also been identified as a center for organized crime and illicit exports, including activities associated with the Russian Wagner Group, which is currently under U.S. sanctions.

Cameroon is a transit country for timber sold from CEMAC countries which are then transported in ships to China, Vietnam, Europe and other markets. According to a press release from the Bolloré Africa Logistics subsidiary (now Africa Global Logistics) the Port of Douala's wood terminal, which employs 400 people, handled an average of 1 million m³ of timber per year, and this was expected to increase with an expansion of the port. Sources indicate that the deep-water port of Kribi exported more than 240 million tons of logs in 2022, shipped to three destinations: China, Vietnam and Bangladesh.⁷⁴

In 2022, the Global Initiative Against Transnational Organized Crime (GI-TOC) mapped hotspots of illicit economies and violent conflict across West Africa. Several coastal hubs, including Douala and other Cameroonian ports, were classified as 'high risk' for illicit and criminal activity. In recent years, security reforms have improved oversight of goods in the Port of Douala and have brought port management in line with international standards. However, GI-TOC's forthcoming research on the port found that vulnerabilities endure, and physical security improvements may be undermined by corruption.⁷⁵

NGOs report of products from the logging operations of Wood International Group, controlled by Russia's Wagner Group, a notorious Russian private military enterprise, are channelled from the Central African Republic (CAR) via Cameroon. ⁷⁶ The United States has placed Wood International Group under sanctions. ⁷⁷

Challenges in Cameroon's forestry sector have limited its production mainly to basic wood products like roundwood
and sawn wood. Cameroon has increased log export taxes and is considering a full export ban. In the meantime, the
country has already banned the export of numerous species in log form, though the system is complicated by
exceptions and quotas.

According to the World Bank's latest report Economic Report on Cameroon, its forestry industry faces several challenges, including inadequate infrastructure, illegal logging, governance issues, a lack of skills development, and corruption. These factors have restricted the sector primarily to the production of basic wood-processed products such as industrial roundwood and sawn wood.

Cameroon has been steadily increasing taxes on log exports. Cameroon banned the export a large number of species in log form to promote local processing and protect its forest resources. In 2018, the government began prohibiting the export of raw logs from 31 tree species. This list was further expanded in 2023 to include 45 additional species, such as moabi (*Bailonella toxisperma*) and okoume (*Aucoumea klaineana*), both highly valued. Many of the bans are complicated by exceptions or quotes, making it difficult to determine compliance with the ban. Nevertheless, the presence of Cameroon's number species-specific log export bans signals a need for additional risk assessment and mitigation actions to ensure that the species are indeed accurately reported. The majority of Cameroon's logs are exported to China and Vietnam, both of which have committed to import regulations prohibiting the trade in illegally sourced timber. Chinese companies reportedly prefer raw logs, buying around 64 percent of the 2021 total volume of logs exported by Cameroon.⁷⁸

Cameroon is also part of a regional commitment under the Central African Economic and Monetary Community (CEMAC) to ban raw log exports entirely by 2026 (sometimes reported as by 2028). However, this transition has faced delays, as domestic industries are not yet equipped to process the necessary volume of timber.

In 2021, 55% of Cameroon's forest products were exported to countries with regulations prohibiting the import of
illegally sourced wood, an increase from 38% in 2019. Recent investigations have uncovered widespread illegalities
in specific supply chains, particularly concerning timber trade flows between Cameroon and China, as well as
Cameroon and Vietnam. However, there are ongoing concerns about illegal timber entering other international
markets as well.

Wide-ranging illegalities in specific supply chains have recently been exposed, in particular related to the Cameroon-China and Cameroon-Vietnam timber trade flows. ^{79,80,81} The most common species exported to Asian markets include tali (*Erythrophleum ivorense*) followed by okan/adoum (*Cylicodiscus gabunensis*), ayous (*Triplochiton scleroxylon*), dabéma

(*Piptadenia africanum*) and sapele/sapelli (*Entandrophragma cylindricum*). Reports suggest that demand from Asia is increasingly for the species that are being abandoned by the European market like iroko (*Milicia excelsa*), azobe (*Lophira alata*), moabi (*Baillonella toxisperma*) and red padouk/ padouk rouge (*Pterocarpus soyauxii*). There has also reportedly been a reorientation of demand away from bubinga, to ekop-beli (*Julbernardia pellegriniana*) and pachyloba (*Afzelia pachyloba*). At

The disparities between the trade reports of Cameroonian exports and the mirror imports from China and Vietnam has been striking. Analysis of UNCOMTRADE data shows that between 2019 and 2021, China reported importing timber valued at \$674 million from Cameroon while Cameroon reported exporting timber worth \$366 million to China. Thus, there is potentially a gap of \$308 million less on the declarations made by Cameroon. In the same period, Vietnam declared that it imported wood worth \$479 million from Cameroon, compared to \$237 million in exports declared by Cameroon, a gap of \$242 million less on the Cameroon side.

Chinese involvement in forestry and the timber trade in Cameroon has also risen over the past two decades. Of the 100 companies holding logging titles in Cameroon, 18 have Sino-Asian capital, with 16 operating with Chinese capital.85 There has been a growing appetite for Asian firms to acquire FMUs since 2005. However, to date, MINFOF has not issued a logging permit to any Sino-Asian operators. 86 Given the difficulties faced in obtaining FMUs, some Asian-owned companies decided to target access and logging rights in communal forests. Companies have reportedly signed notarized partnerships with community councils which has created a set up whereby the company offers to finance the forest classification process and development of the required forest management plan. In return, the community agrees to sell logged timber to that company at a preferential price, or at a specific volume or species. 87 In most cases, these contracts have reportedly lasted for five years. 88 Of the 21 notarized subcontracts approved by MINFOF for the exploitation of communal forests, 12 were signed with Asian enterprises. In these instances, the companies have reportedly targeted the communal forests of the South and Littoral regions due to the presence of specific high value species in high demand by Asia (azobe, tali, ayous and ekop-beli) and the proximity to ports. Today, there has been a shift in operations with many of the companies operating with Asian capital now reportedly minimizing their risks and increasingly sourcing from companies that already have logging titles. 89 This has led to the growing importance of broker companies known locally as "courtiers" that do not have their own logging titles but buy from other companies and act as traders. 90 The majority of these companies are based around the port of Douala and rely on agents or "transitaires" to handle the entire export process.91

Illegalities tied to trade with Asian markets include, for example, companies logging outside of authorized areas, export of logs in breach of the partial log export ban, misdeclaration of the timber products and species exported, use of Cameroonian front-face companies to cover foreign-controlled operations in breach of national laws, violation of labor laws and corruption. 92,93 Most Asian traders reportedly pay their timber suppliers in cash. 94 The amounts of the payments range from hundreds of thousands to tens of millions of CFA francs. This method of payment does not comply with the legislation and reportedly facilitates tax avoidance, creating a loss of earnings for the government of Cameroon. 95 This practice also reportedly gives rise to the payment of commissions and royalties. 96

Concerns have also been raised regarding the legality of the trade between Cameroon and the EU. 97,98 The European Union is EsCameroon's main export market for sawn timber with many large-scale forest operations predominantly owned by European companies. For example, a series of Greenpeace investigations into the broker or "courtier" company Compagnie de Commerce et de Transport (CCT), which has historically supplied the European market but is now reportedly Cameroon's top log exporter to China, found that a number of logging companies that supplied CCT were allegedly involved in the laundering of illegally harvested wood. 99,100 Many of the suppliers were reportedly logging with SSV permits. 101 Greenpeace reports that CCT has traded with companies importing into several European Member States. 102 Dutch enforcement authorities took a Dutch importer of CCT timber to court with a ruling in 2017 that the importer was in breach of the due diligence obligations under European Union Timber Regulation (EUTR). 103 MINFOF subsequently issued responses to Greenpeace's investigations, refuting the allegations. 104

• Significant efforts have been made to improve traceability and transparency in the forestry sector, but third-party legality verification systems have yet to achieve widespread adoption or scale.

The European Forestry Institute's Forest Governance Indicator for Cameroon reports that mechanisms for stakeholder participation in in dialogues related to forest governance improved between 2020 and 2020, but during that time, transparency declined. ¹⁰⁵ Citizens' abilities to hold the forest authorities accountable or to fully participate in the management of forest resources is limited, often accredited to decentralized systems and limited availability of information. ¹⁰⁷

Cameroon and the EU entered into a Forest Law Enforcement Governance and Trade (FLEGT) Voluntary Partnership Agreement (VPA) in 2011 to promote trade in legal timber products and improve forest governance. The commitments laid out in the agreement between Cameroon and the EU are ambitious but the VPA is yet to enter into force and progress has reportedly been slow, are particularly on the enforcement, transparency and traceability commitments. Since 2013, there has been no formal Independent Monitor of Forest Law Enforcement in place unlike in other countries in the region such as Republic of the Congo. However, some national civil society organizations have developed external forest independent monitoring systems, which are playing a growing role in improving the availability of information on the ground.

Lack of transparency around logging permits continues to be reported as an issue, including, for example, the lack of publicly accessible maps for areas of operation for some SSVs. 114 Up to date data on production, forest concessions and timber exports are still lacking and after several unsuccessful attempts, the legality verification system still requires work. 115 While major timber companies have harvesting concessions, some also acquire a portion of their logs from small scale operators through the 'vente de coupe' system. Obtaining documents for such operations can prove challenging to the numerous small scales "ventes de coupe," many of which lack clear legal ownership. 116

FLEGT licensing is not operational, and in 2023 the European Commission was assessing the potential for developing a complementary instrument to the VPA, in light of the new EU Regulation on deforestation-free supply chains. ¹¹⁷ In early 2022, the country officially launched the second generation of the Forest Information Management System (SIGIF2) which aims to trace timber from the forest to the port. However, its development has been the subject of major disagreements between MINFOF and officials in Europe, and certificates issued by SIGIF2 are likely not recognized or validated under the European Union Timber Regulation (EUTR), and even less in the context of future FLEGT licenses. ¹¹⁸

In late 2023, the FSC report that the preliminary results of the transaction verification (TV) loop and Forest Inventory Fraud investigation on FSC-certified Afrormosia, also known as African Teak, in Cameroon and CAR have revealed some integrity risks that have been prioritized for deeper investigation.¹¹⁹

Reports continue to document cases of illegal logging particularly around high value species. Enforcement remains
weak and there is a risk of illegal timber harvested from Cameroon being smuggled across the border and exported
from Nigeria.

A survey of Ebo forest by Cameroon's Agricultural Research Institute for Development (IRAD) between August 2020 and March 2021 highlighted that around 2 tons of African zebrawood (*Microberlinia bisulcata*), a critically endangered species on the International Union for Conservation of Nature (IUCN) Red List is being smuggled out of the forest with the researchers predicting that illegal logging will push the species to the brink of extinction. ¹²⁰ In 2006, the Cameroonian government designated Ebo forest a proposed National Park, although no decree was ever signed. Logging, palm oil concessions and SSVs have been designated since. ¹²¹ Chinese traders based in Douala were reportedly paying \$600/m3 for African zebrawood, a price that has doubled since 2018 and driving the current rates of illegal commercial harvesting. ¹²² In 2020, the government had to withdraw a decree classifying the area as a forestry concession (under FMU 07 05) after protests from Banen communities, scientists, and civil society organizations globally. ¹²³

In theory, several actors are involved in enforcement including, among others, the administration in charge of forest and wildlife, law enforcement agencies, the judiciary, other multilateral partners such as Interpol, NGOs and forest bordering communities. ¹²⁴ However, in practice, these actors reportedly are only involved in providing information. ¹²⁵ MINFOF rangers are ultimately responsible for investigating forest crimes and lead control missions to inspect companies. There have been a number of missions which appear to have led to temporary suspensions of company operations although statistics and information on missions, rates of non-compliance and penalties applied appear to be announced occasionally and are difficult to find. In 2019, MINFOF announced that two logging companies Société Bois Africains du Cameroun (SBAC) and 'Société Forestière de Bouraka (SFB) were ordered to suspend logging activities in east Cameroon with some timber seized as a result of the companies reportedly breaking the law. ¹²⁶ On September 4, 2020, the Minister of Forestry and Wildlife, Jules Doret Ndongo, signed two decrees temporarily suspending the operations of about twenty wood processing units in the Littoral region. ¹²⁷ On June 29, 2023, the Minister of Forestry and Wildlife has signed another temporal suspension of a forestry operation license.

Relying on only one ministry dedicated to managing and enforcing all forestry issues has reportedly strained local implementation and enforcement. Furthermore, budgetary constraints further hamper enforcement efforts. Cameroon reportedly has around 360 rangers for all 9.1 million hectares of protected areas. The number of rangers operating and carrying out missions outside of protected areas is unclear. An operational analysis looking at Cameroon's mechanisms for

fighting illegal logging over the period 2017-2019 in the southern and eastern regions found that very few forest offenders are the subject of legal proceedings and the penalties imposed are not dissuasive enough which is reportedly contributing to maintaining or even increasing rates of illegal logging.¹²⁹

There are also concerns about the coordination of enforcement efforts transnationally, and particularly between the governments of Cameroon and Nigeria as well as the Central African Republic and the Republic of the Congo regarding cross border illegal logging. For example, in January 2021, 21 Nigerians were arrested in Donga-Mantung, the north-west border region of Cameroon, for illegal logging. The number of Nigerians arrested in a single operation has led to reports that there is an established transnational syndicate operating between Nigeria and Cameroon which can only be controlled through stronger domestic and regional enforcement responses. 131

The Environmental Investigation Agency (EIA) has reported that much of the wood exported from Nigeria between 2014 and 2017 was illegally logged and exported in violation of state and federal laws. Although Nigeria ranks second among Africa's seven largest tropical wood-producing countries, much of this timber is reportedly sourced from Cameroon. EIA have reported that the illegal timber is often smuggled from Cameroon to Nigeria by way of bribes to police and army at the border and on the road. Over 1.4 million illegally sourced Cameroonian kosso logs, a high-value and rare "lookalike" rosewood species which has seen rapidly increasing demand from China, were shipped to China through Nigeria in 2017. Taraba State borders Cameroon and serves as Nigeria's wood trafficking hub. Poor forestry governance, weak monitoring and corruption have depleted forest reserves over the past decade and illegally logged wood from Donga-Mantung is now reportedly trafficked to Bissaula in Nigeria. In Takum, a popular hub for timber products in Taraba, it is reloaded onto trucks and moved through Benue and Kogi states to depots in Obollo-Afor and Sagamu. From there it's hauled to Onne and Lagos seaports and shipped to Hanoi in Vietnam, which is the gateway to China's timber markets. Sagamus in Nigeria and Sagamus from the cit's hauled to Onne and Lagos seaports and shipped to Hanoi in Vietnam, which is the gateway to China's timber markets.

The Minister of Forestry and Wildlife announced in July 2021 that an operation was being carried out in Boumba and Ngoko in east Cameroon following similar actions taken along the Sangha and Ngoko rivers within Central African Republic and the Republic of Congo where 22 people were arrested including 14 Cameroonians.¹³⁷

REPORTS & ADDITIONAL RESOURCES

A list of relevant reports and additional online tools to complement this country report are also available at the IDAT Risk website: https://www.forest-trends.org/fptf-idat-home/.

Key additional reading:

- 1. Pulitzer Center series of investigations. 2023. "Cameroon's Undeterred Illegal Loggers." Pulitzer Center https://pulitzercenter.org/stories/how-illegal-wood-escapes-control-circuits-cameroon
- 2. Constant Momballa-Mbun, Allen Mgaza, Camilla Floros, Hin Keong Chen. 2023. An overview of the timber traceability systems in the Congo Basin countries¹³⁸
- 3. European Forestry Institute. 2023. "Cameroon forest governance situation 2007–2022."
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METHODOLOGY & TERMINOLOGY NOTES

- a Risk scores reflect Preferred by Nature's Timber Risk Assessment which measures the risk of illegality occurring in 21 areas of law relevant to timber legality, as well as Forest Trends' national governance scores which provides an average relative governance and corruption risk score for 211 countries globally. Preferred by Nature's scores have been flipped to ensure compatibility with Forest Trends' national governance scores, where higher scores are associated with greater governance and corruption challenges. An average of both the Preferred by Nature and Forest Trends scores has been calculated for 66 countries where both are available as of 2021. For all other countries, the risk score reflects Forest Trends' national governance scores. Countries scoring less than 25 are considered "Lower Risk," countries scoring between 25 and 50 are "Medium Risk" and countries scoring above 50 are "Higher Risk." It is important to note that it is possible to source illegal wood from a well-governed, "Lower Risk" state and it is also possible to source legal wood from a "Higher Risk" country. As such, the risk scores can only give an indication of the likely level of illegal logging in a country and ultimately speaks to the risk that corruption and poor governance undermines rule of law in the forest sector.
- ^b The term "forest products" is used to refer to timber products (including furniture) plus pulp and paper. It covers products classified in the Combined Nomenclature under Chapters 44, 47, 48 and furniture products under Chapter 94. While the term "forest products" is often used more broadly to cover non-timber and non-wood products such as mushrooms, botanicals, and wildlife, "forest products" is used to refer to timber products plus pulp and paper in this dashboard.
- ^c Except where otherwise specified, all 2015 2021 trade statistics and chart data are sourced from Cameroonian reported data to UN Comtrade, compiled and analyzed by Forest Trends. All 2014 to 2021 all trade data are sourced from UN Comtrade.
- d Regulated markets reflect countries and jurisdictions that have developed operational measures to restrict the import of illegal timber. As of 2024, this included the U.S., the UK, Member States of the European Union (as well as the Iceland, Liechtenstein, Norway and Switzerland), Australia, Canada, Colombia, Indonesia, Japan, Malaysia, South Korea and Vietnam. Some measures are more comprehensive in scope, implementation, and enforcement than others.
- ^e Up to date information on LegalSource certificate holders available at: https://nepconsustainability.secure.force.com/ Certificates/CertificateSearch#.
- ^f Up to date information on OLB certified bodies available at: <u>Forest Certification | Cameroon (bureauveritas.cm)</u>.
- ⁹ All references to "EU + EFTA" signify the 27 Member States of the European Union (as of 2024), as well as the United Kingdom, Iceland, Liechtenstein, Norway and Switzerland.
- Independent forest monitoring (IFM) has become a component of the Voluntary Partnership Agreements (VPAs), which are a pillar of the EU's Forest Law Enforcement, Governance and Trade (FLEGT) Action Plan. The Action Plan entered into force in 2003 in response to rising international concerns about the social, economic and environmental impacts of illegal logging and related trade. Each VPA is a bilateral trade agreement negotiated between the EU and a timber-exporting country. While parties enter into a VPA voluntarily, the agreement becomes legally binding when both parties have ratified it.
- All sixteen range States of kosso (Pterocarpus erinaceus) were referred to the CITES Standing Committee in 2021 on the basis of documented, widespread and pervasive illegal trade in this species. Seven countries including Cameroon are now subject to a suspension of commercial trade, applicable to exports, imports, re-exports and stockpiles of kosso and this will remain in place until satisfactory non detriment findings and legal acquisition findings are received and accepted by the CITES Secretariat and the chairs of the Plants and Standing Committees¹³⁹ The Cameroonian CITES Authorities have stated that there is no up to date population inventory nor distribution data and that there are no management standards for the species. The authorities also noted that the species is at risk of unregulated and illegal logging, with illegally harvested timber exported to China via Nigeria. See Cameroon section of WCMC report https://cites.org/sites/default/files/eng/com/pc/25/Documents/E-PC25-15-05.pdf.

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The Dashboards have been compiled from publicly available information sources to support risk assessments on the legality of timber products entering international supply chains. The Dashboards are for educational and informational purposes only. The Dashboards have been drafted with input from the Environmental Investigation Agency (EIA) and are subject to external peer review. The Dashboards will be updated periodically based on newly available information.

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