



# Timber Legality Risk Dashboard: Mozambique

Drafted as of: December 2024

## SUMMARY OF LEGALITY RISKS

**Risk Score:** 81.6 (Higher-Risk)<sup>1</sup>

**Conflict State:** YES<sup>2</sup>

**Log Export Ban in Effect:** YES<sup>3</sup> on all logs (from both native and plantation species)

**Import Regulation in Effect:** NO

- **Illegal logging has plagued Mozambique's forestry sector since its independence, despite an extensive legislative framework and a series of log export bans meant to control illegal exports.**
- **Recent reports claim the illicit trade in rosewood is linked to armed conflict in the northern province of Cabo Delgado. Smuggling of this "conflict timber" is estimated to be worth US\$23 million a year, with the majority exported to China.**
- **Recent investments from the World Bank and FAO in Mozambique's forestry sector have aimed to transition illegal logging activity to sustainable forest use and legal timber trade.**
- **Mozambique's timber trade is predominantly with China, up to half of which is thought to be illegal. There has been consistent documentation that this trade is in violation of Mozambique's log export bans.**
- **Forest law enforcement has improved since the creation of the National Agency for Environmental Quality Control (AQUA), although corruption, bribery, and poor governance remain significant concerns.**
- **Despite challenges in forest governance, forest product exports doubled between 2022 and 2023, from US\$47 to \$92 million.**

## TRADE PROFILE OF FOREST PRODUCTS<sup>4</sup>

**Total Imports (2023):** US\$218.31 million

**Total Exports (2023):** US\$91.70 million

## SUMMARY OF HIGHEST PRODUCT-LEVEL RISKS

**Exports - Top Products Exported to the US by Value (2023)<sup>5</sup>**

- Sawn wood (HS4407)
- Marquetry (HS4420)

In Mozambique, the export of raw timber logs of all commercial timber species were prohibited since 2017.<sup>6,7,8</sup>

## 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 Mozambique.

### CITES-Listed Species (Appendix II):

- *Afzelia* spp.<sup>a,9</sup> including *A. quanzensis* (**chanfuta**)
- *Dalbergia* spp.<sup>b,c,10</sup> including *D. melanoxylon* (**pau-preto**)
- *Khaya* spp.<sup>d,11</sup> including *K. anthotheca* and *K. nyasica* (**African mahogany**)
- *Prunus africana*<sup>e,12</sup>
- *Pterocarpus* spp.<sup>f</sup> including *P. angolensis* (**umbila**) and *P. tinctorius* (**nkula**)

### **Banned from harvest:**

- *Afzelia quanzensis* (**Chanfuta**)
- *Millettia stuhlmannii* (**Jambire**)
- *Pterocarpus angolensis* (**Umbila**)

### **Other high-risk species from natural forests**

- *Baphia kirkii*
- *Brachystegia spiciformis* (**Messassa**)
- *Bridelia micrantha* (**Mussungunu**)
- *Combretum imberbe* (**Mondzo**)
- *Colophospermum mopane* (**Mopane**)
- *Diospyros mespiliformis* (**Ebano**)
- *Guibourtia conjugata* (**Chacate preto**)
- *Milicia excelsa* (**Iroko**)
- *Spirostachys africana* (**Sândalo**)
- *Swartzia madagascariensis* - synonym of *Bobgunnia madagascariensis* (**Pau ferro**)<sup>13</sup>

### **Plantation species**

- *Eucalyptus grandis*
- *Eucalyptus europaylla*
- *Pinus taeda*
- *Pinus patula*

## **FORESTRY SECTOR<sup>14</sup>**

**Forested Area (2020):** 36.74 million ha<sup>15</sup>

**Deforestation Rate (2010-2020):** 0.6% annually<sup>16</sup>

**Forest Management (as of 2015):<sup>16</sup>**

- Private ownership: 75,000 ha
- Public ownership: 37.8 million ha

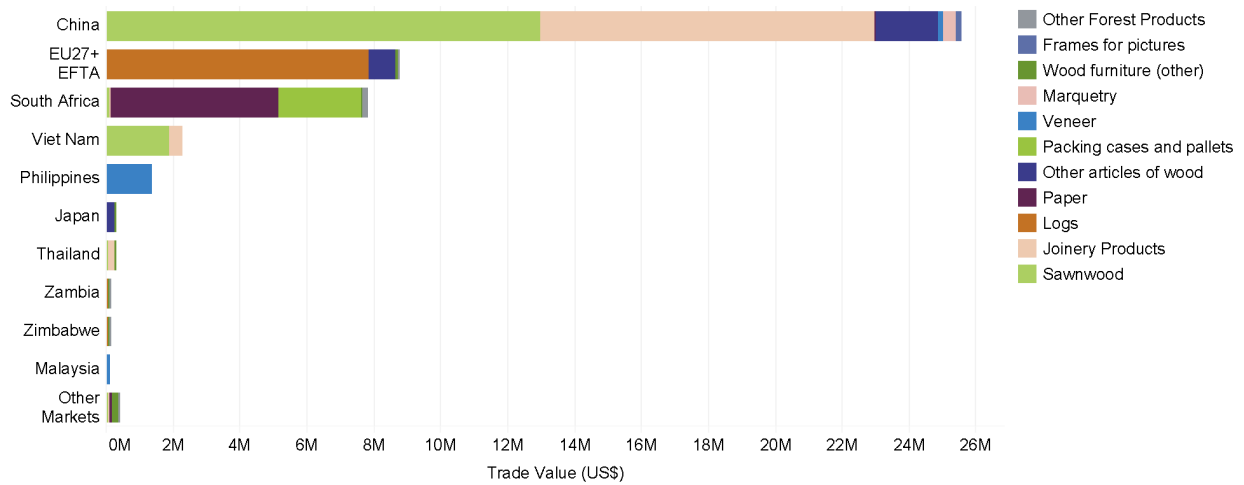
### **Certified Forests:**

- FSC Certification (2024): 134,178 ha<sup>17</sup> with three Forest Management (FM) certificates in the country

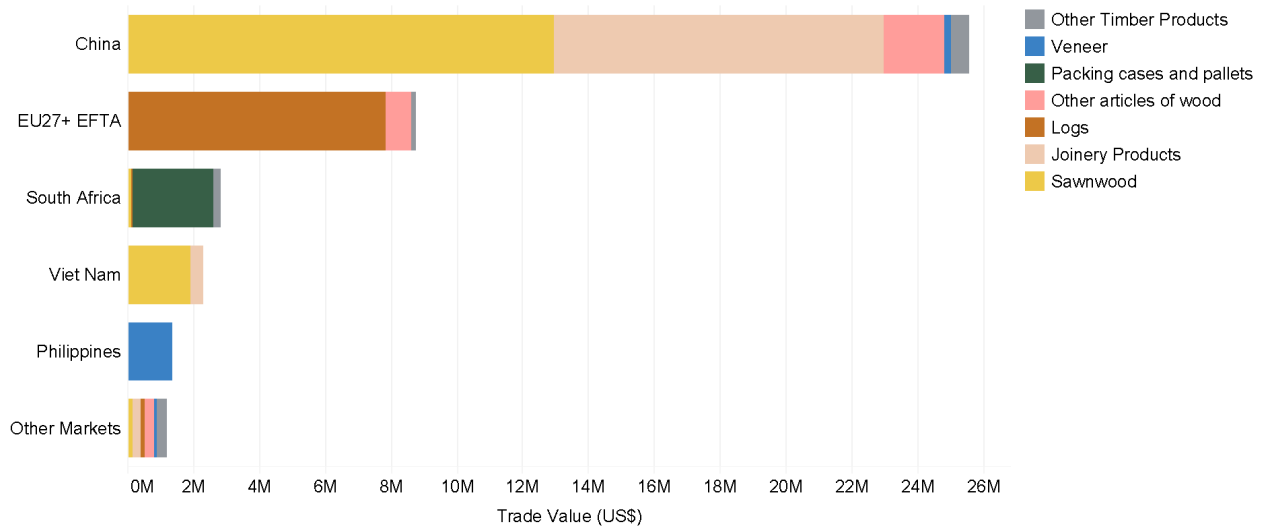
**Domestic Production (2021):<sup>18</sup>**

- Wood fuel: 16.72 million cubic meters (m<sup>3</sup>)
- Logs: 1.98 million m<sup>3</sup>
- Sawnwood: 562,000 m<sup>3</sup>
- Charcoal: 263,000 metric tonnes
- Paper: 9,000 metric tonnes

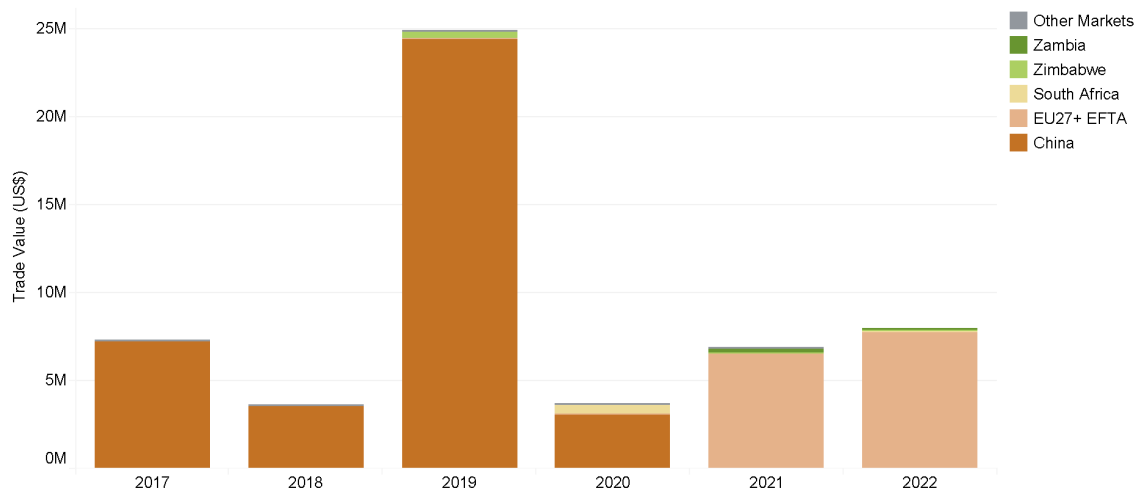
### MOZAMBIQUE FOREST PRODUCT EXPORTS BY COUNTRY AND VALUE<sup>19</sup>(2022)



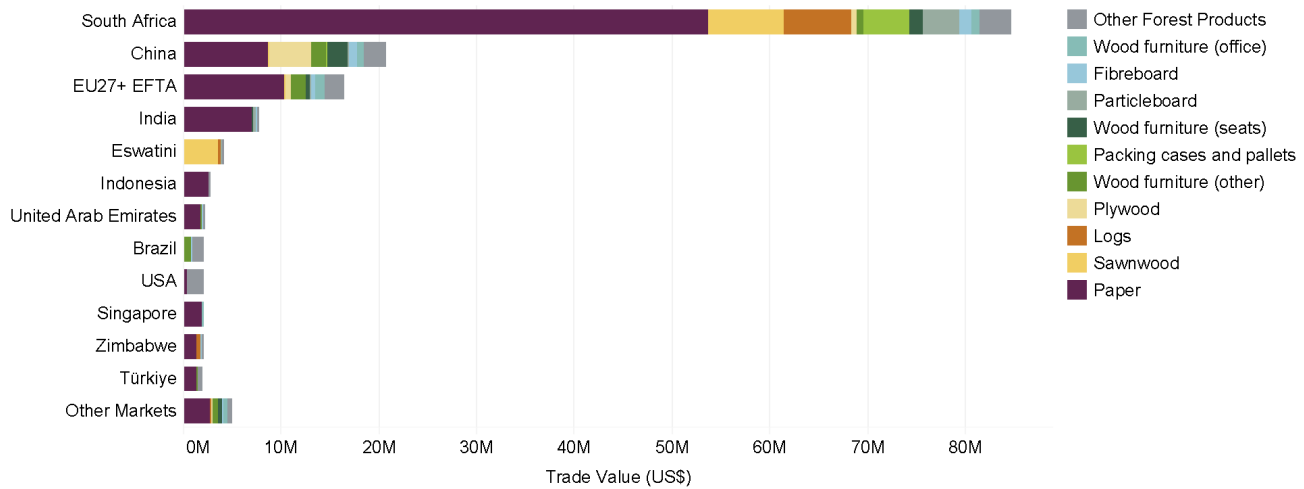
### MOZAMBIQUE TIMBER PRODUCT EXPORTS BY COUNTRY AND VALUE<sup>20</sup>(2022)



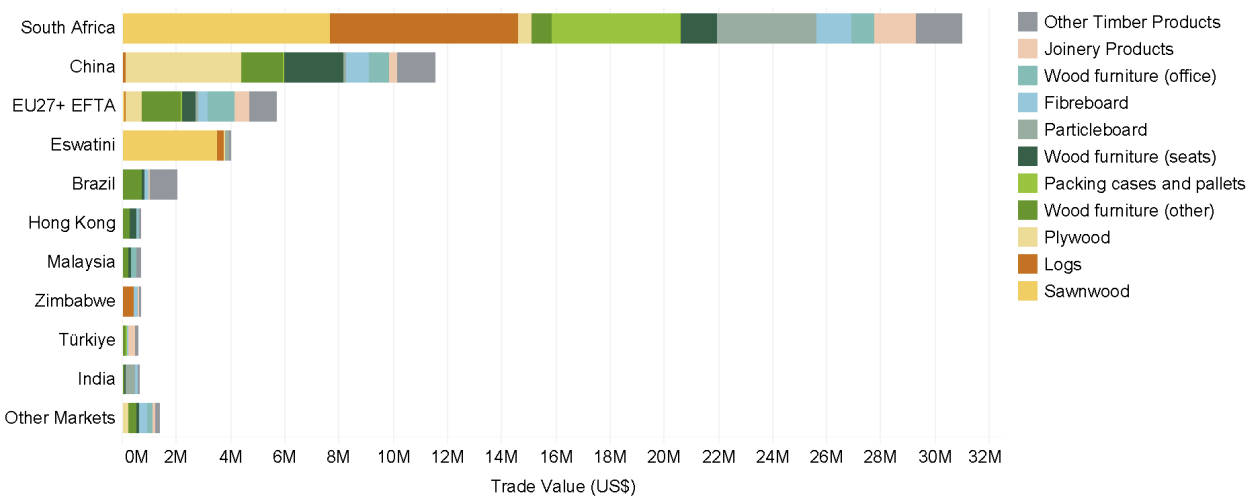
### MOZAMBIQUE'S EXPORTS OF LOGS BY COUNTRY DURING YEARS OF ACTIVE LOG EXPORT RESTRICTIONS<sup>21</sup>(2017-2022)



## MOZAMBIQUE'S IMPORTS OF FOREST PRODUCTS BY COUNTRY AND IMPORT VALUE<sup>22</sup> (2022)



## MOZAMBIQUE'S IMPORTS OF TIMBER PRODUCTS BY COUNTRY AND IMPORT VALUE<sup>23</sup> (2022)



## TIMBER LEGALITY

Mozambique's forest area is estimated at 36.7 million hectares (Mha), equivalent to 46.7 percent of its total land area.<sup>24</sup> Between 2002 and 2022, Mozambique lost four Mha of tree cover, analogous to a 14 percent decline in forest cover since 2000.<sup>25</sup> Small-scale agriculture is the main driver of forest loss, responsible for more than 90 percent of tree-cover loss since 2001.<sup>26,27</sup> Large-scale agriculture, mining, uncontrolled fires, urban expansion, fuelwood and charcoal production, and timber extraction are the other key causes of forest loss.<sup>28</sup>

Natural forest accounts for nearly 99.8 percent of Mozambique's forest area, within which the dominant native species are *Brachystegia spiciformis* (messassa), *Brachystegia boehmii* (mafuti), *Julbernardia globiflora* (messassa encarnada), *Colophospermum mopane* (mopane), *Pterocarpus angolensis* (umbila), *Millettia stuhlmannii* (jambire), *Sclerocarya birrea* (canho), *Pseudolachnostylis maprouneifolia* (messolo), *Uapaca kirkiana* (metongoro), and *Burkea africana* (mucarala).<sup>29</sup> The populations of many of these species are decreasing according to the national inventory, with species such as *Pterocarpus tinctorius* (nkula) not available in even the minimum diameter for permissible cut.<sup>30</sup>

Plantations, comprising the remaining 0.2 percent of Mozambique's forest area, are characterized by four main introduced species, namely *Eucalyptus grandis*, *Eucalyptus europphylla*, *Pinus taeda*, and *Pinus patula*.<sup>31</sup>

- **Extensive illegal logging and associated trade has been documented in Mozambique since its independence from Portugal in the 1970s, despite an extensive legislative framework and a series of log export bans meant to control illegal exports.**

Illegal logging escalated during the Mozambican Civil War, following the country's independence from Portugal in 1975. Although a General Peace Agreement was signed in 1992 between Frente de Libertação de Moçambique (FRELIMO) and Resistência Nacional Moçambicana (RENAMO), an indefinite truce was not mutually agreed upon until 2017.<sup>32</sup> The political turmoil and hierarchical corruption that has characterized Mozambique since its independence, coupled with China's burgeoning demand for log imports, has allowed for unregulated and often illegal logging and associated trade to take place, in spite of the country's forest legislation and the implementation of various log export bans over the last two decades. Today, this demand has driven illegal logging and trade for timber products in Mozambique, so much so that more than 90 percent of logging in the country was considered illegal in 2013.<sup>33</sup> Former Minister of the Environment Celso Correia estimated in 2017 that the country loses half a billion dollars per year to illegal logging.<sup>34</sup>

The University of Eduardo Mondlane (UEM) compared actual timber consumption (domestic data and global reports on Mozambican timber imports) with official licensed harvesting data and found that approximately two-thirds of logging between 2007 and 2012 was unlicensed, equating to 2,666,942 cubic meters of timber.<sup>35</sup> The Environmental Investigative Agency (EIA) suggests an even larger prevalence of illegality: in the seven years prior to 2014, 81 percent of logging in Mozambique was illegal. In 2013 alone, almost all logging (93 percent) was illegal, with mondzo, pau ferro, umbila, jambire, and chanfuta being the main species targeted.<sup>36</sup> All five are categorized as first-class species and banned from export in raw form under Decree 12/2002. The extent of illegality and focus on a limited number of species led to EIA issuing a warning in 2014 that Mozambique's commercial timber stocks could be entirely depleted within 15 years.<sup>37</sup>

In 2022, the central province of Zambézia experienced the most tree-cover loss of any province at 72.5 thousand hectares (Kha).<sup>38</sup> Between 2002 and 2022, tree-cover loss in Zambézia was 1.09 Mha, nearly double that of the next closest province, Nampula, at 562 Kha, followed by Manica (472 Kha), Nassa (452 Kha), and Cabo Delgado (446 Kha).<sup>39</sup> Illegal logging was regularly documented in each of these provinces over the same period, as well as in the southern province of Gaza, Sofala in central Mozambique, and Tete, a northwestern province that shares its borders with Zambia, Zimbabwe, and Malawi.

- **Most recently, reports have linked illegal forestry operations to organized crime and the financing of armed conflict in the northern area of Cabo Delgado.**<sup>40</sup>

Mozambique is on the international Financial Action Task Force (FATF) gray list, with the highest proceeds-generating crimes identified as corruption, drug trafficking, tax fraud, environmental crimes (forestry and wildlife), kidnapping, and illegal restraint.<sup>41</sup>

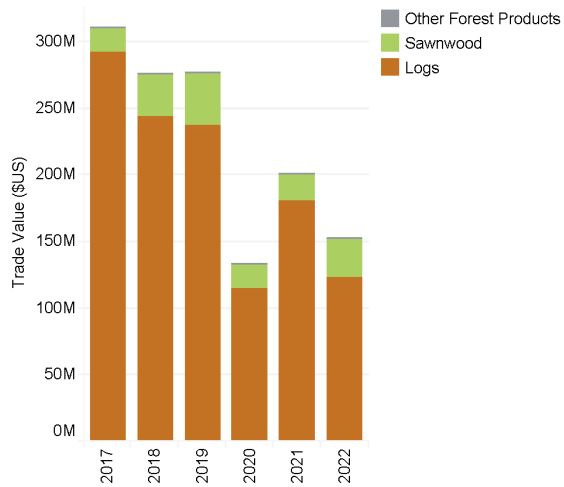
A recent 2024 investigation by the EIA has linked illegal harvesting and trade of rosewood to China with the financing of armed conflict in Cabo Delgado. Chinese traders are linked with "conflict timber" purchased from Ahlu Sunnah Wal Jamaah (ASWJ) insurgents in Cabo Delgado, which is then mixed and exported alongside other wood. This four-year undercover investigation in both countries has revealed that poor management of officially sanctioned forest concessions, illegal logging, and corruption among port officials is allowing the trade to expand unchecked in insurgent-controlled areas. Timber traders are reportedly well organized in their processing and trading systems in the main city of Montepuez.<sup>42</sup>

- **Despite successively more stringent log export bans, logs continued to be exported, primarily to China.**

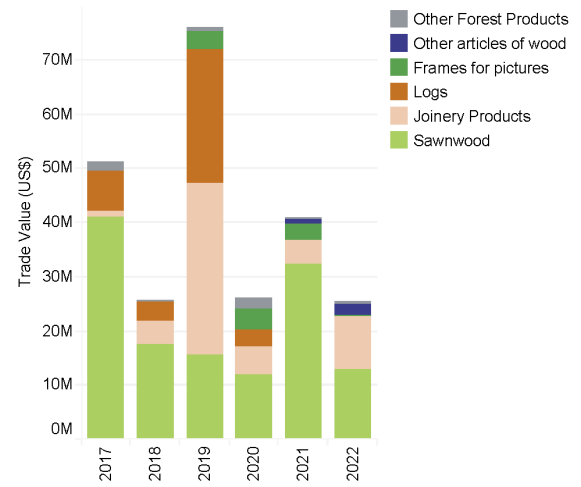
In December 2023, previous log export bans were expanded to cover all native and plantation species.<sup>43</sup> Previously, only logs of native species were banned since January 1, 2017.<sup>44</sup> Under Law 14/2016, semi-processed timber, such as parquet (beams and planks), could be exported subject to an export tax, while no export taxes were imposed on finished products, such as furniture.<sup>45</sup>

Despite these bans, between 2017 and 2020, firms in the country illegally exported [2.6 million tonnes of logs worth \\$900 million](#), in violation of the log export ban. Others place this number at an average of over 500,000 tons per year since 2017.<sup>46,47</sup> An overwhelming majority of these shipments were destined for China; the EIA estimates that over 89 percent of timber exports to China between 2017 and 2023, worth US\$1.3 billion, were shipped in breach of the national log export ban.<sup>48,49</sup>

## CHINA'S IMPORTS OF FOREST PRODUCTS FROM MOZAMBIQUE<sup>50</sup> (2017-2022)



## MOZAMBIQUE'S EXPORTS OF FOREST PRODUCTS TO CHINA<sup>51</sup> (2017-2022)



- **Mozambique's timber trade is predominantly with China, up to half of which is thought to be illegal, with widely documented export ban violations, trade reporting disparities, and loss of timber tax revenue.**

UN Comtrade indicates that China is the primary destination for Mozambique's timber products, followed by EU27/EFTA countries and South Africa.<sup>52</sup> Mozambique's illegal timber trade is largely driven by Chinese demand, in particular for the highly-prized rosewood, which is protected under CITES. A Memorandum of Understanding (MoU) between Mozambique and China was signed in June 2018, setting out their mutual intentions to eradicate forest degradation and improve transparency and benefit-sharing between Mozambican operators and Chinese investors.<sup>53</sup> Yet, in a 2024 report, EIA estimates that Mozambique loses an estimated half a billion dollars a year to illegal logging trade with China. Chinese businesses allegedly pay bribes to government officials to smooth the passage for tonnes of wood to be shipped from the Cabo Delgado port. The wood, purchased from Mozambican loggers at low prices, ultimately is sold in China as high-end decking and furniture valued at tens of thousands of dollars in luxury boutiques.<sup>54</sup>

UN Comtrade trade data show significant disparities in Mozambique's reported exports against China's reported imports. In 2022, China imported US\$153.01 million worth of timber products from Mozambique.<sup>55</sup> By contrast, Mozambique reports the value of its timber exports to China in the same year at US\$25.55 million.<sup>56</sup> Between 2017 and 2022, Chinese customs reported 3.39 billion kilograms more imported timber from Mozambique than Mozambique reported as exported to China.<sup>57</sup>

Underreporting exports is suggestive of potential illegalities, such as exporting native species that are under an export ban, tax avoidance, or missing paperwork relating to concessions, permits, or harvesting quotas. This is not a new problem. The EIA reported significant trade discrepancies in 2012, with between 189,615 and 215,654 m<sup>3</sup> of timber illegally exported from Mozambique to China, equivalent to nearly 50 percent of China's annual imports from Mozambique.<sup>58</sup>

Even amongst stakeholders within Mozambique, statistical discrepancies in export datasets exist. In Zambézia, for example, customs officials reported 33,122 m<sup>3</sup> of timber exports in 2011, whereas the Provincial Service of Forests and Wildlife (SPFFB) registered 21,083 m<sup>3</sup> and port authorities disclosed 67,644 tonnes.<sup>59</sup> Lost revenue from tax avoidance is also a significant issue. In 2012 alone, the EIA estimates that nearly US\$30 million was lost in tax revenue due to timber being smuggled illegally to China, bypassing the taxes that logging companies are required to pay under the Timber VAT Law No 7/2010 and 2002 Regulation.<sup>60</sup> More recent data on lost tax revenue from illegal logging and timber trade do not appear to be available.

- **In addition to log export bans, several species are under CITES protection or are subject to total export bans.**

Of the native species, umbila and jambirre are categorized under the 1999 Forestry and Wildlife Act as first class species.<sup>61</sup> The 2002 Forestry and Wildlife Regulation prohibits the export of first class and precious species in raw form.<sup>62</sup> However, *Dalbergia melanoxylon* (pau preto) (categorized as a precious species and CITES-listed in Appendix II), and *Millettia stuhlmannii* (jambire), *Swartzia madagascariensis* (pau ferro), and *Combretum imberbe* (mondzo) (categorized as

first-class species) are in high demand in China in their raw form, particularly for Ming and Qing Dynasty furniture reproduction.<sup>63</sup> Mozambique is in Category 2 of the CITES National Legislation Project, with legislation that is believed generally not to meet all of the requirements for the implementation of CITES. The recent listing at COP19 in 2022 of African populations of species in the genera *Azelia*, *Khaya*, and *Pterocarpus* in Appendix II of CITES could also cause implementation issues, particularly with reference to stockpiles. Evidence should be produced pre-export that timber was harvested before the date the listing came into effect (February 23<sup>rd</sup>, 2023) in order to qualify for an exemption of the permit requirements; there is a risk that timber harvested after this date could be mixed with pre-Convention timber to circumvent these regulations.

In 2018, an export ban on chanfuta, umbila, and jambire was imposed by the Ministry of Land, Environment and Rural Development (MITADER), with licenses for these species allocated solely for the domestic market and only MITADER-approved operators permitted to log them.<sup>64</sup> Although this ban is widely referred to by media outlets, there is no associated legal text available.<sup>65</sup> It extends an earlier partial ban on exports of chanfuta and umbila logs, which was passed in 2003 and restricted exports to 60 percent of the approved harvest quota.<sup>66</sup> Ministerial Diploma No 10/2016 also implemented a five-year special ban on logging ironwood (pau ferro), from January 1<sup>st</sup>, 2016, until 2021 (it is unclear if this has been renewed).<sup>67</sup>

Under the 1999 Forestry and Wildlife Act (LFFB) (Law No 10/1999) and the 2002 Forestry and Wildlife Regulation (Decree No 12/2002), 118 species of commercial timber were grouped into the following classes, based on quality, use, demand, and taxes: "first," "second," "third," "fourth," and "precious."<sup>68</sup> Each class was assigned a different exploratory tax rate, the highest to precious species and the lowest to fourth class species.<sup>69,70</sup> In June 2002, through Decree 12/2002, Mozambique banned the export of first class and precious species in raw form, although these species could be exported if they were processed (Table 1).<sup>71</sup>

**TABLE 1. PRECIOUS AND FIRST-CLASS SPECIES BANNED FROM EXPORT  
IN RAW FORM UNDER DECREE 12/2002<sup>72</sup>**

Scientific Name	Common or Local Name	Class
<i>Berchemia zeyheri</i> (a synonym of <i>Phyllogeiton zeyheri</i> )	Pau-rosa	Precious
<i>Dalbergia melanoxylon</i>	Pau-preto	Precious
<i>Diospyros kirkii</i>	Mucula-cula, muoma	Precious
<i>Diospyros mespiliformis</i>	Ebano	Precious
<i>Ekebergia capensis</i>	Inhamarre	Precious
<i>Entandrophragma caudatum</i>	Mbuti	Precious
<i>Guibourtia conjugata</i>	Chacate preto	Precious
<i>Milicia excelsa</i>	Tule / iroko	Precious
<i>Spirostachys africana</i>	Sândalo	Precious
<i>Azelia quanzensis</i>	Chanfuta	First
<i>Androstachys johnsonii</i>	Mecrusse	First
<i>Albizia glaberrima</i>	Mutivera	First
<i>Albizia versicolor</i>	Tanga-tanga	First
<i>Balanites maughamii</i>	Nulo	First
<i>Breonadia microcephala</i> (synonym of <i>Breonadia salicina</i> )	Mugonha	First
<i>Baikiaea plurijuga</i>	Chiti	First
<i>Combretum imberbe</i>	Mondzo	First
<i>Cordyla africana</i>	Mutondo	First
<i>Diospyros</i> spp.	Mucucul-culri, muoma	First
<i>Erythrophleum suaveolens</i>	Missanda	First
<i>Faurea speciosa</i> (synonym of <i>Faurea rochetiana</i> )	Muxiri, nthethere, mussossola	First
<i>Inhambanella henriquesii</i>	Mepiao	First



Scientific Name	Common or Local Name	Class
Khaya nyasica	Umbáua	First
Millettia stuhlmannii	Jambire	First
Monotes africanus	Muculala	First
Morus lactea (synonym of <i>Afromorus mesozygia</i> )	Mecobeze	First
Pterocarpus angolensis	Umbila	First
Podocarpus falcatus (synonym of <i>Afrocarpus falcatus</i> )	Gogogo, izulambite, chongue	First
Pseudobersama mossambicensis	Tondue, minhe-minhe	First
Swartzia madagascariensis (synonym of <i>Bobgunnia madagascariensis</i> )	Pau ferro	First

- **Problems exist in the granting of harvesting licenses and concessions, and enforcement is weak.**

The process through which timber harvesting rights are acquired is still shaped today by the 1999 Forestry and Wildlife Act and its 2002 Regulation, implemented by the Ministry of Agriculture (MINAG) and National Directorate of Lands and Forests (DNFF). These laws assert that while all forest and wildlife resources are under state ownership, timber harvesting rights can be obtained via either simple licenses or forest concession agreements.

Simple licenses are exclusively reserved for Mozambican operators who can demonstrate support from local communities and possession of appropriate logging equipment.<sup>73</sup> Under the 1999 Act and Articles 15 to 24 of its Regulation, simple licenses could be granted for harvesting quotas of up to 500 cubic meters annually, for a period of one year or less and with no specified maximum area.<sup>74,75</sup> Decree No 30/2012 later imposed a 10,000-hectare limit on simple licenses and extended their validity to five years, although it maintained the 500 cubic meter annual logging quota.<sup>76,77,78</sup> It also stipulated that applications should be supported by a management plan and forest inventory.<sup>79</sup> Yet, georeferenced mapping reveals that some simple licenses exceed 60,000 hectares, 50,000 more than the limit imposed under Decree No 30/2012.<sup>80</sup> It is thought that one of the reasons for Mozambique's weak forest law enforcement is that the large number of simple licenses granted each year has made it difficult for officials to control the actions of so many operators.<sup>81</sup> In spite of a stated policy objective to reduce the number of simple licenses, a national media outlet reported in 2022 that the forestry sector employs 14,000 people with 1,000 operators, 80 percent of whom are under simple licenses.<sup>82</sup>

Forest concessions are granted to both national and non-national operators and are renewable for up to 50 years.<sup>83</sup> The aim of this longer timeframe is to incentivize concession license holders (CLHs) to undertake sustainable logging practices. Under Articles 25 to 36 of the 2002 Forestry and Wildlife Regulation, concessions may be authorized for areas less than 20,000 hectares by the provincial governor, whereas the Minister of Agriculture is responsible for authorizations of concessions between 20,000 and 100,000 hectares, and applications for more than 100,000 hectares are referred to the Council of Ministers.<sup>84</sup> The allocation of concessions is on a first come, first served basis, provided that the applicant complies with a series of conditions. These include approval from local communities, extensive forest inventories, a management plan detailing annual harvesting blocks, and an associated processing industry.<sup>85</sup> The requirement of a management plan prior to a concession application differs compared to some Central African countries where concessions may be granted on the condition that a management plan is implemented in subsequent years.<sup>86</sup>

Under a World Bank project, a Forest Information System (SIF) was launched in April 2022, which in theory could provide a real-time license issuing tool and ensure greater transparency across the sector through various forest product monitoring and tracking functionalities.<sup>87,88</sup>

- **World Bank and FAO projects have aimed to support the country's transition from illegal logging to sustainable forest use and legal timber trade.**

Although some African countries, such as Ghana and the Republic of Congo, have implemented or are negotiating Voluntary Partnership Agreements (VPAs) with the European Union, Mozambique is not one of those countries.<sup>89,90,91</sup> Nonetheless, through FAO's Forest Law Enforcement, Governance and Trade (FLEGT) program, Mozambique was selected as one of the non-VPA countries to receive support in its forestry sector.<sup>92</sup> The main aims of the program are to crack down on illegal logging, facilitate the transition toward sustainable forest management, and promote trade in legal



timber products. Four projects, amounting to US\$425,189, have been implemented through the FAO-FLEGT program thus far, namely GORONGOSA, AAAJC, DINAF, and AMOMA.<sup>93</sup> Each project has a slightly different objective within the broader aim of reducing illegal logging, ranging from community empowerment and promoting community-based governance to improving private sector representation in forest governance schemes.

In 2017, the World Bank approved the Mozambique Forest Investment Project (MozFIP), with a budget of US\$47 million over a six-year period.<sup>94,95</sup> The project, which has now ceased, aimed to support sustainable forest management, particularly through engagement with local communities and creating livelihood opportunities. Through MozFIP, MITADER and FAO worked in partnership to develop a Forest Information System and forest certification system.<sup>96</sup> The Forest Information System (SIF) was launched in April 2022, aiming to provide a real-time license issuing tool and ensure greater transparency across the sector through various forest product monitoring and tracking functionalities.<sup>97,98</sup>

- **Forest law enforcement has improved since the creation of the National Agency for Environmental Quality Control (AQUA), although corruption, bribery, and poor governance remain significant concerns.**

The ease with which log export bans are bypassed and harvesting quotas are exceeded is facilitated by corruption amongst high-level governmental officials and weak law enforcement. Transparency International scored Mozambique 26/100 on their Corruption Perceptions Index in 2022, making it the 38th most corrupt country in the world.<sup>99</sup> The EIA has indicated that forest officers, customs officials, and certain Mozambican parliamentarians are widely implicated in forest crime and illegal timber exports.<sup>100</sup> The Agency also reported that Chinese timber companies operating in Mozambique are frequently able to circumvent container inspections and that false declarations of logs as processed wood or planks and payments of bribes to politicians are commonplace.<sup>101</sup>

Forest law enforcement has improved since these enforcement responsibilities were transferred from the National Directorate of Agriculture and Forests (DINAF) to AQUA. AQUA was created under Decree No 80/2010 and given specific enforcement tasks, such as land-use monitoring and research, through Decree No 2/2016.<sup>102</sup> An important milestone was the launch of Operation Tronco (Operação Tronco) by MITADER on March 9th 2017, in which illegal timber confiscations were carried out concurrently in Sofala, Manica, Cabo Delgado, Zambézia, Tete, and Nampula.<sup>103</sup> Over 150,000 cubic meters of illegal logs were seized and within one week, nearly US\$1.5 million was issued in fines in Cabo Delgado alone.<sup>104</sup> Perhaps even more important than these financial and tangible outcomes was the message it sent to logging operators that the government was committed to addressing the illegal timber trade. After Operation Tronco and under Ministerial Diploma No 28/2017, MITADER suspended license issuance for both simple licenses and forest concessions for 90 days.<sup>105</sup>

Fining remains one of Mozambique's main penal instruments. Article 39(1) of the 1999 Forestry and Wildlife Act, for instance, states that logging without a license, exceeding harvest quotas, and other forestry offences are punishable by fine.<sup>106</sup> In response to the increase in illegal logging, Decree No 73/2011 was issued, increasing fines for breaches of forest legislation.<sup>107</sup> The confiscation of illegal timber and associated machinery and materials is also a central penalizing tool. Whereas materials may be returned to the unlicensed operators (known as *furtivos*) after fines are paid, the seized products are either auctioned or donated, including to schools for constructing tables.<sup>108</sup> However, it is not uncommon for *furtivos* to buy back the seized timber at public auctions, much of which is then shipped to China, where it was originally destined for.<sup>109</sup> AQUA's representation and involvement at provincial and local scales is also unclear, as it was initially created to operate at a national level. Without the capacity for local interventions, AQUA risks replicating Mozambique's previous forest law enforcement models, which fundamentally failed to expose illegal timber operators and tackle illegal logging.

- **Illegal logging continues to be documented, despite a significant restructuring of Mozambique's legislative framework.**

Under Presidential Decree No 1/2015, the Ministry for Environmental Coordination was abolished and replaced by MITADER, which became responsible for forestry and wildlife.<sup>110</sup> This was the first time that such responsibilities had devolved from the Ministry of Agriculture. Celso Correia, who was appointed Minister for Land, Environment and Rural Development in 2014/5 and has remained in his post through at least November 2024, has stated his commitment to eradicating hierarchical corruption in Mozambique's forestry sector, recognizing that illegal logging cannot be regulated without changes in personnel and improvements in law enforcement.<sup>111</sup> Presidential Decree No 13/2015 began a process of restructuring within the forest sector, with the aim of improving forest protection and conservation and promoting sustainable forest use for social, economic, and ecological benefit.<sup>112</sup> The aforementioned logging ban on pau ferro and Operation Tronco were two particularly important aspects of this reform.

Reductions in illegal logging have been documented since these legislative changes. In 2018, Zambézia was the province with the most tree cover loss,<sup>113</sup> although in the same year, António Branco, the District Attorney for Gilé, Zambézia, announced that no cases of illegal logging were recorded in Gilé National Reserve for the first time in five years.<sup>114</sup> In contrast, 15 cases were reported in the protected area between 2015 and 2016. Harvested land, created by 35 logging licenses, encircles the Reserve's 2,980km perimeter.<sup>115</sup>

However, illegal log harvests and exports also continue to be documented since this legislative restructuring. Illegal timber seizures were reported by the Mozambican government in 2020, with approximately 2,000 illegally harvested logs seized by authorities in the central province of Tete.<sup>116</sup> One year later, 76 containers of wood that had been illegally exported to China were recovered by Mozambican authorities.<sup>117</sup> Illegal timber from Zambézia and Manica was also uncovered by AQUA in 45 containers that were due to be exported from the Port of Beira in Sofala province. In Cabo Delgado, Mozambique's poorest province, forest law enforcement is almost certainly weakened by the ongoing Islamist insurgency. Attacks carried out by Al-Shabaab and indiscriminate gunfire from the Dyck Advisory Group, a South African private military company hired by Mozambique's chief of police, have killed more than 1,300 civilians and displaced 500,000 others.<sup>118</sup> The illegal timber trade is reported to fund the Al-Shabaab's insurgency,<sup>119</sup> making it difficult to envision a crackdown on illegal logging in the province in the near future.

## 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. Environmental Investigation Agency. 2024. "Shipping the Forest: Millions of Tons of Illegal Timber from Mozambique, Including Conflict Timber, are Exported to China for Luxury Furniture". [Shipping the Forest - EIA US](#).
2. CITES. 2016. *Manual of Annotations*. Version 1. Compiled by Schippmann, U. Convention on International Trade in Endangered Species of Wild Fauna and Flora.

## METHODOLOGY & TERMINOLOGY NOTES

<sup>a</sup> CITES Annotation #17: Only logs, sawn wood, veneer sheets, plywood, and transformed wood are regulated.

<sup>b</sup> CITES Annotation #17: Only logs, sawn wood, veneer sheets, plywood, and transformed wood are regulated.

<sup>c</sup> CITES Annotation # 6: b) Finished products to a maximum weight of wood of the listed species of up to 10 kg per shipment; c) Finished musical instruments, finished musical instrument parts, and finished musical instrument accessories; d) Parts and derivatives of *Dalbergia cochinchinensis*, which are covered by Annotation # 4; and e) Parts and derivatives of *Dalbergia* spp. originating and exported from Mexico.

<sup>d</sup> CITES Annotation #17: Logs, sawn wood, veneer sheets, plywood, and transformed wood.

<sup>e</sup> All parts and derivatives, except: a) seeds (including seedpods of Orchidaceae), spores and pollen (including pollinia). The exemption does not apply to seeds from *Cactaceae* spp. exported from Mexico, and to seeds from *Beccariophoenix madagascariensis* and *Dypsis decaryi* exported from Madagascar; b) seedling or tissue cultures obtained in vitro transported in sterile containers; c) cut flowers of artificially propagated plants; d) fruits, and parts and derivatives thereof, of naturalized or artificially propagated plants of the genus *Vanilla* (Orchidaceae) and of the family Cactaceae; e) stems, flowers, and parts and derivatives thereof, of naturalized or artificially propagated plants of the genera *Opuntia* subgenus *Opuntia* and *Selenicereus* (Cactaceae); f) finished products of *Aloe ferox* and *Euphorbia antisyphilitica* packaged and ready for retail trade; and g) finished products derived from artificial propagation, packaged and ready for retail trade of cosmetics containing parts and derivatives of *Bletilla striata*, *Cynoches cooperi*, *Gastrodia elata*, *Phalaenopsis amabilis*, or *Phalaenopsis lobbii*.

<sup>f</sup> Annotation #17: Logs, sawn wood, veneer sheets, plywood, and transformed wood.

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