



May 2008

# Legal imports into Europe of illegal timber from Cameroon



Since being introduced for the first time at the G8 in 1998, the issue of illegal logging has remained one of the priorities on the international agenda and has been the theme of multiple summits and international conferences.

Cameroon, one of the main tropical wood exporters to Europe, is also involved in this issue. It is very difficult to estimate the percentage of illegal logging in Cameroon. However, this is not the objective of this report: that is to indicate the mechanisms that allow legal export to Europe of illegally harvested timber from Cameroon.

The Forestry Department of Cameroon provides different permits for timber harvest in forests: for Forest Management Units (UFAs, Unités Forestières d'Aménagement), community forests, communal forests and Sales of Standing Timber (Ventes de Coupes). Small permits (petits titres) are special authorizations allocated by the Ministry of Forests and Wildlife (MINFOF) in Cameroon, which permit timber collection for projects such as road construction or creating a plantation.

In the past two years, Friends of the Earth France, Netherlands and Cameroon have conducted investigations to identify the mechanisms of illegal harvesting and the purchasers of this timber, particularly with respect to small permits.

In 2007, as part of the Forest Law Enforcement Governance and Trade (FLEGT), the European Union officially engaged in negotiations with Cameroon to discuss a Voluntary Partnership Agreement (VPA).<sup>1</sup> VPAs have been put forward by the European Commission as the key factor in the fight against illegal logging and related timber trade. This report reveals that outside of official discussions and apparent commitments within the framework of the VPA, illegal logging runs rampant and continues to benefit a minority of influential individuals.

<sup>1</sup> Ghana is also well advanced in the negotiations and countries like Liberia, Gabon and the Democratic Republic of Congo have expressed interest.

The European Union is working on additional measures to fight against illegal timber trade in Europe. This report aims to show that the problem of illegal logging can only be resolved by taking vigorous measures.

## Illegal logging and trade routes

Illegal logging in Cameroon covers several types of legal violations, ranging from logging without authorization to not paying taxes. The connections indicated below are those for which the most serious violations have been noted: no harvesting permit, overharvesting or logging outside official boundaries.

### Illicit harvests

Illicit harvest means that trees are felled without a permit. These harvests may take place in forests close to a road that do not belong to any person or concession, and might even be situated in nature reserves.

Illicit harvests are carried out by small operators, often without logging licenses, who manage to log timber illegally thanks to connections with a local influential network involving the forest administration, police, military or political parties. In the Eastern Province, we were able to identify an illegal harvesting network headed by a local entrepreneur who is the owner of a leading third-party logistics company (Case No. 1).

Illicit harvests focus on timber species most in demand by international markets, those which are commercially very lucrative: azobé, sapeli, doussié, moabi, wengé, tali or iroko.

Illegal logging sites are generally close to roads to facilitate transportation of timber using manual labour: transporting



**Timber waiting for transportation and perfectly visible, on the side of the Lomié Messok road.**

a piece of timber to the roadside costs between FCFA 500 (€ 0.75) to FCFA 2000 (€ 3), depending on the distance and the type of timber. Harvested timber is stored on the side of the road until there is enough (approx. 25 cubic meters, that is 500 to 1200 pieces depending on the volume) to fill a flat-bed truck.

During our missions, we observed that these stacks were often barely hidden from view or were even fully visible, which supports the suspicion that authorities may be involved.

This type of illegal logging has a very negative ecological impact as trees are sawn into boards on the spot with a chain



**Remaining timber after illicit logging**

saw, or with light, mobile sawmill (Lucas Mill) and only the best pieces are used. The rest is abandoned in the forest, which results in huge waste. It is estimated that only 20% of the harvested timber is actually used.

### **Looting of the community forests**

Community forests were created to reduce poverty by allowing the local population to manage forests themselves. Even though the intention is good, the forests are a failure for several reasons:

Name of the illegal operator:

**Etablissements Abong-Mbang Cars**

Location:

**Eastern Province**

Case  
nr 1

Since 2006, the 'Abong Mbang Etablissements' company has been plundering commercially lucrative timbers (mostly moabi, sapeli and doussié) in the Eastern Province close to roads. Logging started in the Mindourou-Lomié area and then spread to the Lomié-Messok area: according to our investigations, mostly village areas were logged. Timber is harvested and then sawn by means of a Lucas Mill, a small sawmill that can be mounted in the forest. Timber is stored on the side of the road until there is enough for a truck load. The timber has no marks indicating its illegal origin, whereas the law requires transported timber to be clearly identified (with company logo and permit name). The organizers of this looting are members of the Ebo'o family and managers of the Abong-Mbang Car logistics company.

We were able to observe timber being loaded onto a truck and verified that there were no logos on the timber. The trucks are loaded in the afternoon and drive during the night, so as not to attract any attention, to a small sawmill on the outskirts of Abong-Mbang. In June 2007, we noticed that these operators had been warned of a field mission organized by the international donors as part of the Forest and Environment Sector Program (PSFE). At that



**Loading illegal timber on a flat-bed truck near Messok**

time, work was interrupted and only started again after the mission had ended. This clearly indicates complicity with local authorities or the Ministry of Forestry and Fauna. During our last mission in March 2008, the manager of this company had just been taken in for questioning, following a confidential mission planned at national level, and one of his trucks had been seized, but nevertheless his contraband operation does not appear to have been dismantled.

• **No community management of resources and resources are under the control of external elites:**

During an evaluation mission of community forests, the Independent Monitor showed that *'the majority of them were in the grip of the individual interests of a few village members. It shows that more than 80% of the managers of these forests do not live in the villages concerned and most members of the communities declare not being involved in the management of their community forests. More than 60% of these community forests are characterized by conflicts and internal dissent.'*<sup>2</sup>

• **No support of timber harvesting and merchandising:**

To obtain the right to exploit their forests, communities have to submit a very complex set of paperwork and deal with multiple administrative barriers. Specifically, they have to prepare an Environmental Impact Assessment (EIE), undertake an inventory and draft a Simple Management Plan (SMP) with the objective of planning harvesting activities over a 25 year period. Without external support by NGOs or development agencies, the majority of community forests would not have materialized. The problem is that once the SMP is validated, communities receive no support in finding an honest buyer and merchandizing the timber at a fair price. This is why external companies have specialized in third-party community forests harvests: managers come to the villages, pay influential persons,

like the village chief, for a right of access and harvest these forests.

For the majority of cases and applicable to all types of timber, the price paid to the communities for timber is very low (FCFA 2000/m<sup>3</sup> to FCFA 50 000/m<sup>3</sup>, that is € 3/m<sup>3</sup> to € 75/m<sup>3</sup>). In the context of poverty, residents consider this as an opportunity and give carte blanche to the external company, ignorant that this timber may be resold for FCFA 300 000/m<sup>3</sup> to FCFA 500 000/m<sup>3</sup> (€450/m<sup>3</sup> to €760/m<sup>3</sup>) at export.

Generally speaking, these external companies harvest only the most sought-after timber in the market without any thought of respecting the limitations set by the Management Plan. If there are inspections, the community members are considered legally responsible for the non-application of the Management Plan, and not the external company, which inflicts severe violations and makes high profits while doing so.

### Misuse of 'small permits'

Small permits are issued by the Ministry of Forests and Wildlife (MINFOF). These may be permits for timber harvesting or individual log authorizations, but most are Timber Recovery Permits (ARB) and Timber Removal Permits (AEB).

ARBs allow the harvest of timber during development projects such as the construction of a road or the creation of a plantation. AEBs allow the collection of abandoned logs in the forest or along roadsides. In practice, as this report shows, there is no difference between the two, as AEBs are issued for the road construction as well.

Logging with these small permits is characterized by numerous irregularities, as we have observed and as the Independent Monitor confirmed during an inspection in January 2006<sup>3</sup>:

- non-realization of the development projects which are the reason for granting the authorizations (6 out of 30 cases investigated),
- no environmental impact assessment (in 100% of 30 cases investigated),
- no inventory of the exploitation (in 25 out of 30 cases investigated),
- no auction sales (in 21 out of 27 cases investigated).

Moreover, the Independent Monitor observed that a *'recovery permit had been granted in a Forest Management Unit and another one in a forest reserve and found that logging outside boundaries took place in almost all recovery permits as part of the construction of roads or plantations, which were often not marked'*.

Case studies 3, 4 and 5 illustrate these violations.

### Overharvesting and application of Ventes de Coupes

Sales of Standing Volume or 'Ventes de Coupes' are forestry harvesting permits covering a maximum area of 2500 hectares to operate in a limited period of time (1 year, twice renewable).

2 Report of the Independent Monitor, n°50/01/REM

Name of the illegal operator:

**Bexdan Standard**

Location:

**Eastern Province**

Case  
nr 2

In East Cameroon, between 2005 and 2006, the Bexdan company harvested the Lomié-Messok road community forests and exported approximately 1500 m<sup>3</sup> of harvested timber via the port of Douala. During one of our missions in June 2006, we observed that the community forests of Eschiambor, Congo and Moangué-Bosquet had been looted by this company. The method is usually the same: The Bexdan representative comes to the village and gets in touch with influential persons in order to 'motivate' them, as the locals call it. A few days later, he returns to the village to set up the mobile sawmills (Lucas Mill) and brings, as several residents told us, 'bags of rice, boxes of mackerel and wine'. To fell the moabi trees as fast as possible and then head to another village, a resident of Moangué-Bosquet explained to us that Mr Nseke even offered the village youngsters FCFA 5000 (€7.50) for each moabi tree they showed the workers. Once the timber has been felled, residents receive FCFA 35,000 (€53) per m<sup>3</sup>, a sum largely confiscated by the influential persons of the village. In addition, the manager of the community forest of Eschiambor handed us an annual harvest certificate, which was clearly illegal. Normally, this must be based on a timber inventory and specify for each variety the volume of exploitable timber for the year. In the certificate we obtained (see Appendix 1) this had not been filled out, and the total states '500 m<sup>3</sup>'; nevertheless it is signed and stamped by a representative of the government.

3 Report of the Independent Monitor, n°031/OI/REM  
[http://www.observationcameroun.info/documents/OI\\_Rapport\\_031NA.pdf](http://www.observationcameroun.info/documents/OI_Rapport_031NA.pdf)

Name of the illegal operator:  
**SIM** (as a Tchebayou subcontractor)  
Permit:  
**AEB 2522 and others**  
Location:  
**Central Province**

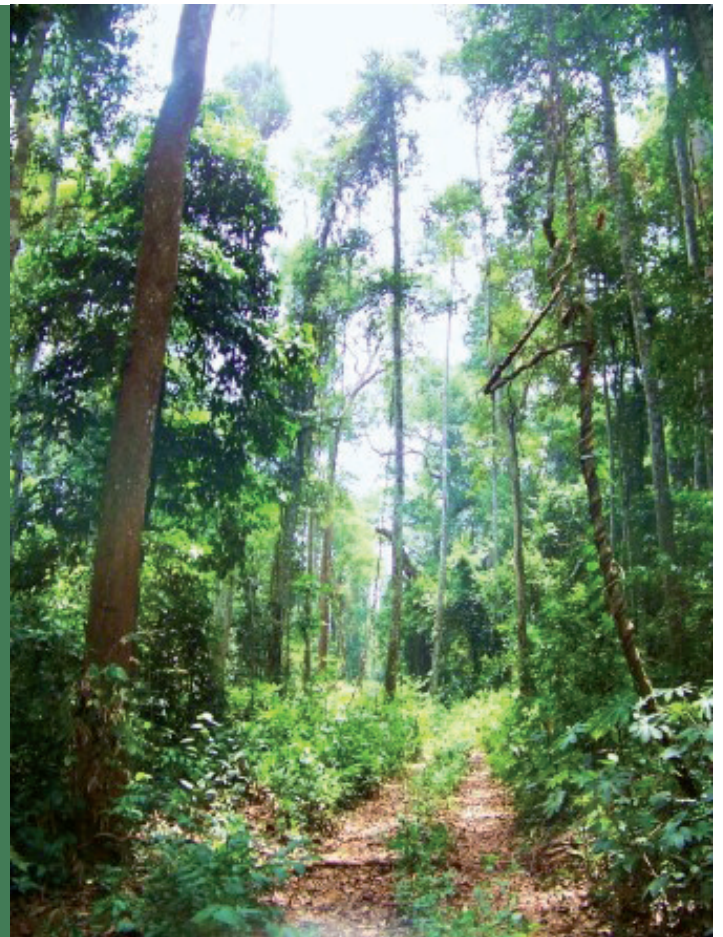
Case  
nr 3

In 2006, a Timber Recovery removal permit (AEB nr 2522) was granted to the German company Tchebayou to open up a 15km road and recover 13,861 m<sup>3</sup> of timber in an improved access project. During one of our missions (March 2007) we noticed that it was in fact the SIM company that had felled the forest using Tchebayou's stamp. Community members did not see anyone else besides the SIM company workers and their manager. SIM showed us various receipts of which we received copies. We observed that this AEB was in fact only an excuse to illegally harvest timber. SIM did not open up more than 5 km of the planned 15 km. The AEB allowed SIM to fell trees located up to 75 m from the road, but we observed a much more substantial harvest, with logging roads entering the forest for more than 10 km.

In order not to provoke tensions with residents, the manager of SIM offered them a few machetes, brick mills and concrete block moulds. An FCFA 2000/m<sup>3</sup> (€3) of timber was also offered to the residents. According to them, the Nanga Eboko sub-prefect was present at the money distribution and took FCFA 200,000 (€ 300) of the total sum each time. On 26 June 2006, a local resident blew the whistle, by writing a letter to the Forestry Minister. This whistleblowing did not lead to investigations or prosecutions. SIM is said to have contacted him and given him FCFA 300,000 (€ 450) to cover it up.

In addition, we observed that SIM was looting the forests located north of the Sanaga river on a large scale, in a region with dry deciduous forests. These forests are very fragile ecosystems in dry, dense forest locations where Iroko is present in high concentrations.

Under the cover of multiple recovery permits and partnerships with subcontractors, SIM engages in a large-scale exploitation. We traced several dirt roads opened on sev-



**An illegal dirt road, inside a forest location, opened by the SIM company for several kilometres.**

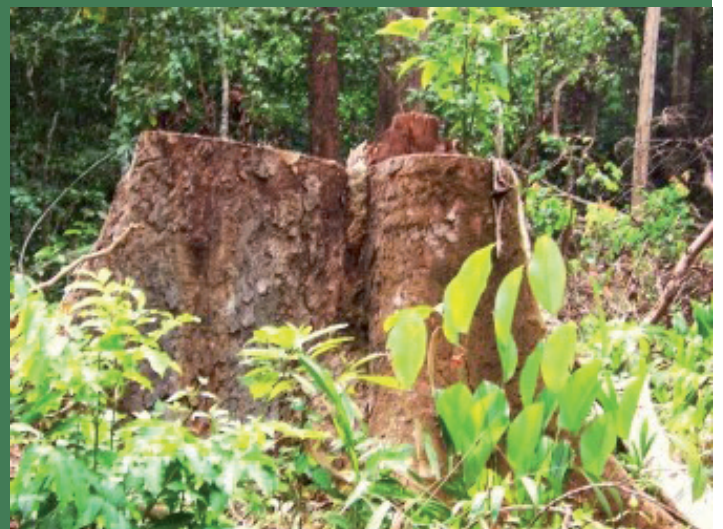
eral kilometres on each side of the roads to reach precious timber locations.

During the first six months of 2007, the SIM company alone exported around 24% of Cameroon's total exports of Iroko (that is 16,523 m<sup>3</sup> out of a total of 69,993 m<sup>3</sup><sup>4</sup>), far more than the volume exported by the largest European groups established in Cameroon.

<sup>4</sup> Export stats from the port of Douala, MINFOF



**Timber yard abandoned by the SIM company as a result of the residents' blockade**



**Iroko timber illegally felled by the SIM company**

Name of the illegal operator:  
**CANABOIS** (as a subcontractor of SITAF)  
Permit:  
**AEB 0014**  
Location:  
**Central Province**

Case  
nr 4

In 2005, the Ministry of Forestry and Fauna granted the SITAF company a Timber Removal Permit (AEB nr 0014) to open up a road near Nanga Eboko. In reality, the harvest of this AEB only started in August 2007. During our mission we observed that the road which was supposed to be opened up already existed before the AEB was granted and that it was regularly maintained by the Ministry of Transport.

The SITAF company belongs to a RDPC member of parliament, the party in power. The harvesting was not done by the SITAF company itself, but by CANABOIS, which, as confirmed by the Police Chief and Department Delegate of MINFOF in Nanga Eboko, was well aware of the situation.



### One of the timber yards opened by the Canabois company

This AEB permit is therefore unfounded and could only have been obtained via corruption or by influential powers. In the field, we noticed large scale illegal logging: dozens of timber yards and dirt roads stretching tens of kilometres into the forest. An AEB only allows timber operations within 75m of the roadside.



The red and white marks on the pillars of the bridge indicate that the road is maintained by the Ministry of Transport.



GPS point measurement to localize felled Iroko trees by the Canabois company at a distance of approximately ten kilometers from the road.

Management plans are not necessary and the harvesting resembles a mining operation, without any regard for sustainable management. In addition, these permits compete with community forests: prior to granting a Ventes de Coupes, the MINFOF must ask the surrounding communities if they would prefer the creation of a community forest.

In practice, the opposite most often happens: the dossiers of requests for community forest creation are blocked by the MINFOF where Ventes de Coupes are planned.

Ventes de Coupes are preferred by companies that want to make fast profits, as exploitation costs are much lower than

those of concessions. Management plans are not required and abuses are frequent. Two examples are presented in case 6 and 7.

Violation:  
**illicit logging with use of another permit to launder timber**

Case  
nr 5

Name of the illegal operator:  
**SEF company** (Ecam-Placage supplier)  
Permit:  
**AEB 1327**  
Location:  
**Central Province**

In April and May 2007, residents of Mbalmayo discovered that the SEF company had opened dirt roads and timber yards to illegally log part of their community forest and the surrounding forests. On 16 May 2007, they wrote to the department delegate of Nyong and So'o to denounce these activities. In June 2007 logs were taken away bearing the AEB 1327 mark granted to the SEF company. However, this AEB was awarded to open a road in the city of Ngomedzap, around sixty kilometers to the west.

Only aningré trees were taken. According to the transport letters we obtained, the timber was bought and sent to the Ecam-Placage sawmill in Mbalmayo. These letters indicate that Ngomedzap was the origin of the aningré logs bearing number 0155477, although they were in fact logged near Mbalmayo<sup>5</sup>. The Ecam-Placage company is an affiliate of the Italian group Italleigno of Milan, specialized in high quality veneer manufacturing. The Mbalmayo sawmill was built in 1976 in partnership with the Cameroonian state, which contributed to the capital via the Société Nationale d'Investissement. In exchange for this participation and the commitment of



**An aningré illegally felled by the SEF company bearing the mark AEB 1327**

the State to forbid aningré log export, the Italian group promised to manufacture aningré plywood in Mbalmayo. Until 2007, Ecam-Placage was enjoying a special authorization to process the aningré from all the forests not yet attributed. The non-renewal of this authorization may explain the fact that Ecam-Placage instead supplies illegal timber today.

<sup>5</sup> See Appendix 2

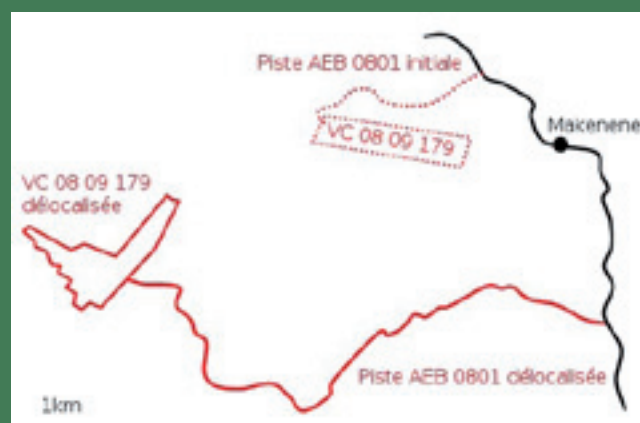
Offence:  
**displacement of a Logging Permit and of an AEB**

Case  
nr 6

Name of the illegal operator:  
**EFM** (Exploitation Forestière Manga)  
Permit:  
**VC 08 09 178 and AEB 0801**  
Location:  
**Central Province**

Ventes de Coupe 08 09 178 was granted in 2006 to the EFM company, with a Timber Removal Permit (AEB 0801) to open up a 12 km dirt road to access it. In the field, we noticed that this Vente de Coupe and the AEB had been diverted by several tens of kilometres to the South-West of Makéné.

The open dirt road, on which timber was removed with AEB number 0801, is almost 40 km long (instead of the authorized 12 km) and the forest in which the Ventes



de Coupe was located yielded much more timber than from just the authorized area. This procedure is illegal: it allows harvesting of a timber-rich forest while avoiding costly competition.

This case does not seem to be the only one of its kind: according to the Independent Monitor, around fifteen other Ventes de Coupes may have been illegally extended<sup>6</sup>.

<sup>6</sup> Quarterly Report nr10 of the Independent Monitor, [http://www.observationcameroun.info/documents/OI\\_Rapport\\_Trimestriel\\_10.pdf](http://www.observationcameroun.info/documents/OI_Rapport_Trimestriel_10.pdf)

Offence:

**Out of boundary harvesting of a vente de coupe**

Name of the illegal operator:

**SOTREF** then TTS (as a subcontractor of the SFEES company)

Permit:

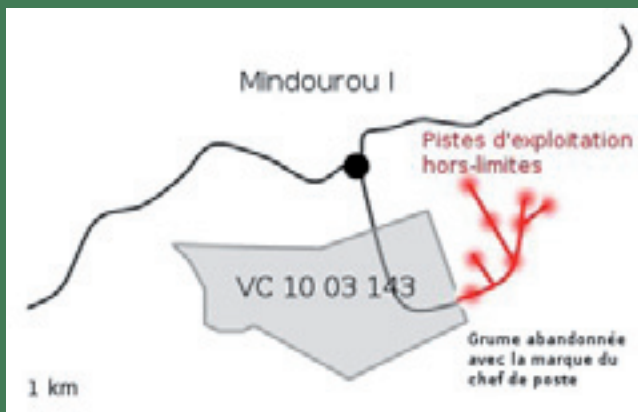
**VC 10 03 143**

Location:

**Eastern Province**

Case  
nr 7

Vente de Coupe 10 03 143 was granted to the SFEES company (Société Forestière Eboueme Ebaka) in 2004 and was exploited until early 2006. The harvest was not directly led by SFEES but by the SOTREF company at the start (of 2004) and then by the TTS company (in 2005). In the forest we observed that the harvest greatly exceeded the authorized limits, through opening up dirt roads several tens of kilometers to the East, near the villages of Ngalando, Gbagbale and Dongali.



We found logs in these illegal timber yards bearing the SFEES logo and their Ventes de Coupe number. More seriously, these logs were marked with the company logo with help of the local forestry checkpoint Mindourou I, in the province of Kadey, which demonstrates the involvement of the local authorities.



**Illegally felled log, marked by the local forest checkpoint.**

## Illegal timber laundering mechanisms

Before entering the port of Douala, illegal timber has to be laundered, so that it holds all the necessary documents for exportation (except container exports, see further).

To achieve this, networks have been set up at the local level, consisting of influential persons like mayors, police or MIN-FOF agents. At the national level, the lack of structural moni-



**On the Bissage ferry that crosses the Sanaga, zoom on crossing rates below.**

**PROGRAMME DE TRAVERSE DU BAC BISSAGA**

JOURS	HORAIRES DE TRAVERSEE			
Lundi	6 H 00mn	10 Heures	15 Heures	18 Heures
Mardi	6 H 00mn	10 Heures	15 Heures	18 Heures
Mercredi	6 H 00mn	10 Heures	15 Heures	18 Heures
Judi	6H 00mn	10 Heures	15 Heures	18 Heures
Vendredi	6 Heures	10 Heures	15 Heures	18 Heures
Samedi	6 Heures	10 Heures	15 Heures	18 Heures
dimanche	6 Heures	10 Heures	15 Heures	18 Heures

Les Horaires ne peuvent pas être respectés, en cas d'urgence

**N.B.** Les versements se feront auprès du trésorier, Contre un reçu.

MOFO	500Frs
Véhicules à quatre roues	1.500Frs aller et retour
Véhicules à six roues	2.000Frs
Véhicules à dix roues	5.000 Frs
Grumiers	10.000 Frs
Plateau de bois où Camions clandestins	50.000 Frs
Les Camions à titre commercial	25.000Frs

*Le Conseiller municipal*

**The tariff to allow an illicit timber truck to pass is clearly indicated: 50 000 FCFA (€75), signed off by a city councilman.**

toring of logging permits and authorized harvest volumes allows these illegal actions to continue.

As a result, illegal timber harvesting has become a powerful means to reinforce influence and enrich a minority, to the degree that these illegal practices are now so much a part of the routine that they are practically considered legal. This was illustrated on the ferry crossing the Sanaga River, in Bissaga (Central Province), where we discovered that the tariff structure included a special tariff for fifth wheels or illicit trucks.

In order to launder the illegal timber, the following steps have to be taken:

### **The first step: Legalize the origin of the timber**

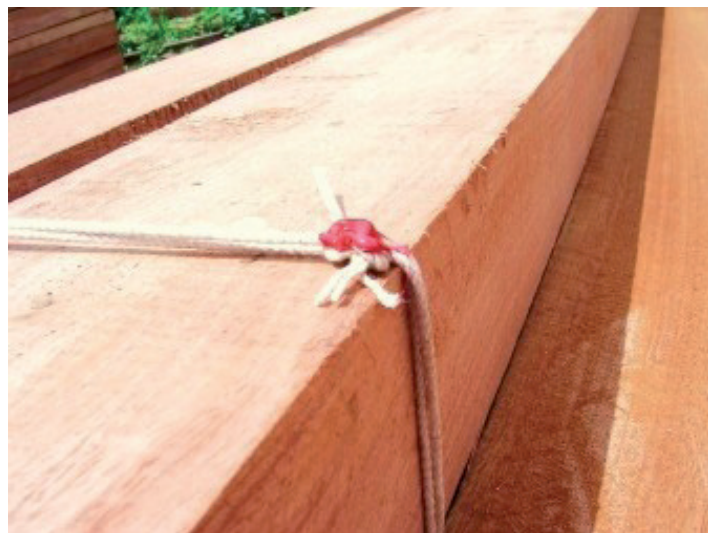
#### **Fictitious auction sales**

Fictitious auction sales constitute an important mechanism in laundering timber from illicit logging, i.e. without any logging authorization or harvest permit.

The department delegate and his supervisor, the provincial delegate, who are the local representatives of MINFOF, are the main persons responsible for this practice.

As we observed during our missions, illegal logging takes place openly: the sight of logged unmarked timber piles on the side of the road waiting to be loaded is not at all uncommon. Local authorities are well informed of what is happening in the forestry sector, which proves their lenient attitude or even their complicity.

People involved in illegal logging also told us that it is not possible to operate in an area without informing the department delegate beforehand. On the contrary, the illegal operator often strikes a deal with him (and with the province delegate, depending on the level of the deal) to legalize the timber through fictitious auction sales. The auction sale is a procedure which was originally perfectly legal, allowing the department or province delegate to sell timber that was seized for fraudulent exploitation. In practice, we observed



**Seized logs released a few hours later in exchange of a payment of FCFA 1,500,000 (around €2300)**

that these auction sales are fictitious in most cases: contrary to existing laws, the author of the infraction from whom the timber was seized is seldom prosecuted and his/her name almost never mentioned at the auction sale. Instead, the company visits the department delegate to organize an auction sale of timber they have illegally felled, in order to legalize it and buy it.

The author of an anonymous report delivered to the Ministry of Forestry in July 2007 explained to us how he was able, in less than a day, to launder 30 m<sup>3</sup> of illegally harvested sapeli in Sangmelima, in the Southern part of Cameroon. In the morning, the department delegate was called to seize the timber and discuss the amount to release it and obtain documents. In the early afternoon, the timber was released for FCFA 1,500,000 (around €2300) and moved to the port of Douala, where a few days later it was loaded on a ship to Amsterdam.

An agent whose job is to facilitate timber laundering for export companies also explained to us how he proceeded, showing us a few follow-up reports he regularly sends to his clients. Below are a few extracts:

*'I just called the delegate lady. After a long talk with her, we concluded that I need to give her FCFA 200,000 (€300) for this timber. This will be in exchange of a fictitious auction sales document that will allow me to transport these logs without a problem.'*

*'I met the department delegate on Wednesday. He made me understand that he is charging the cost of FCFA 50,000 (€75) for a truck, in addition to CFFA 100,000 (€150) [...] and the provincial delegate asks FCFA 140,000 (€215) for two trucks and FCFA 70,000 (€107) for the delivery truck.'*

*'This is to let you know that Mrs. Department Delegate of Water and Forests paid me a visit this morning. [...] She told us that as deadlines have not been met, that the first settlement for the fictitious auction sale plus FCFA 200,000 (€300) is not valid anymore. Now she wants FCFA 480,000 (€730) for this timber to release the documents. I did all I could to get a rebate but she categorically refused.'*

The proliferation of fictitious auction sales is facilitated by the fact that there is no centralization, neither at the MINFOF level nor at the Ministry of Finance (MINEFI) level, so these local representatives do not face structural checks.

#### **Fraudulent use of an existing permit**

Prior to the granting of a timber recovery or removal permit (AEB/ARB), a compulsory inventory of the timber stock must be carried out.

Yet, these inventories are never carried out and the authorized harvest volumes are unrealistic in most cases: for example, the AEB 785 or AEB 2522 (case nr 3) have exploitable volumes of 114 m<sup>3</sup>/ha and 58 m<sup>3</sup>/ha although the average for AEBs is around 5 m<sup>3</sup>/ha (table 1).

In addition, no monitoring is carried out to check that the harvested volume of a small permit does not exceed the authorized volume. MINFOF has all the necessary data available to compare authorized volumes with harvested volumes from one year to the next on the same permit, but fails to execute these comparisons.



**Table 1:**

**Authorized harvest volumes for several AEBs. The authorized volume in the case of a road clearing is calculated on the basis of a 10 m-wide road and a right to harvest 75 m on each side.**

Permit number	Company name	Length of the road or surface	Authorised volume (m <sup>3</sup> )	Authorised volume (m <sup>3</sup> / hectare)
AEB 785	Topaze	17 km	31095	114,3
AEB 2522	Tchebayou	15 km	13861	57,75
AEB 1411	Le Zenith	34 km	21013	38,6
AEB 786	Topaze	6100 ha	31 598	31,6
AEB 1333	SIM	80 km	36523	28,5
AEB 1102	Zingui Judas Sarl	63 km	28231	28
AEB 0307	SIM	1000 ha	26473	26,5
AEB 72	DEUK	1000 ha	23196	23,2

More seriously, it is MINFOF who is responsible for the continuously increasing numbers of ARB/AEBs. The number of these small permits nearly doubled between 2006 and 2007, from 60 to 110. In numerous cases, there is no justification for these permits because the road to be built already exists (case nr 4) or there is no actual plantation project.

The absence of monitoring of AEB/ARBs is the main weakness that allows illegal timber laundering in Cameroon.

### **The second step: Transport the timber to a sawmill to process it into export quality**

Once harvested in the forest, the timber is sawn into large pieces with a mobile sawmill (a Lucas Mill for instance). There are numerous flaws left in the wood: sapwood presence, timber faults or wrong sizes. It then has to be reworked in a sawmill to achieve export quality.



**Illicit log loading near Mindourou (Eastern Province)**

Until recently, chopped pieces were loaded directly onto flat-bed trucks in full sight, but we observed that where monitoring missions were taking place, illegal operators had started to load timber in old refrigerated vans for a higher level of discretion.

According to testimony given by an operator, the price of a flat-bed truck is around FCFA 15,000/m<sup>3</sup> (€22/m<sup>3</sup>) in addition to toll fees at the different checkpoints guarded by the police.

Trucks take the timber to a small sawmill, generally located at the nearest town, where it is adjusted to the size required by the market: for instance, 66 mm thick and 88 mm wide.



**Illicit sawmill in Kumba (South-West Province)**

Pretending to be buyers, we managed to visit one of the illicit sawmills in Kumba in the South-West Province. Disguised as part of a development project, this sawmill is one of the hubs of timber trafficking in the Kumba region. Timber from around ten illegal operators is altered and stocked there waiting for a buyer. Not a single wood batch has a mark which would allow a check on the origin and/or the legality of the timber.



**Sawmill of the EFH company in Douala. This company does not hold any logging permit but exports more and more wood every year.**

**The third step:  
Attribute the name of a company in possession of an export accreditation to the timber.**

In order to be transported to the port of Douala and be exported, illicit timber must be marked with the logo or the seal of a company owning a permit for timber export.

Today there are approximately one hundred companies which own a timber export permit in Cameroon: these include major European groups like Wijma, Rougier (SFID) or Pallisco (CIFM), as well as small companies having no sawmill nor any operating permits.

In 2007, only 37 companies with export permits owned an officially granted logging permit (eg. vente de coupe, concession, ARB/AEB...): this is less than a third.

To obtain permission for export from the MINFOF, a legal timber supply and a fixed transformation site are required. Companies having no exploitation permit to justify legal timber sourcing can nevertheless obtain the permission if they have a sourcing contract with another company. For example, Etablissements Gregc-R has a recovery contract of short pieces and discarded timber with the Fanga Forestière company, which owns UFA 09-006.

**Table 2:  
Moabi volume exported between 2005 and 2007 for several companies**

Company name	2005	2006	2007
A.B.C.	0	39	309
Bexdan Standard	934	163	0
EAW	396	202	513
EFH	37	178	474
ETG	0	563	679

There are numerous shadow companies which have neither forestry operating permits nor transformation units but which do export timber.

These companies sometimes have very short life expectancies: they can appear, export substantial timber volumes and disappear within two or three years.

Table 2 shows the situation for moabi, one of the most sought after species for export. In 2006, 56 companies, most of which do not have logging permits, exported a total of 13,394 m<sup>3</sup> (of which 9734 m<sup>3</sup> to France). There is no explanation for the fact that within only a few years, companies without permits have managed to export almost 1,000 m<sup>3</sup> of moabi per year and then suddenly disappeared (i.e.: Bexdan).

**The fourth step:  
Obtain a transport letter**

Transport letters are documents that a company needs to transport timber and allows timber to enter the port of Douala.

Authorities do not conduct comparisons between the volume exported and the volume for which the company owns a sourcing validation. This results in massive fraud and trafficking of transport letters. Once export permission has been obtained, a company is able to request any number of transport letter carnets and resell them if it does not have enough wood to export.

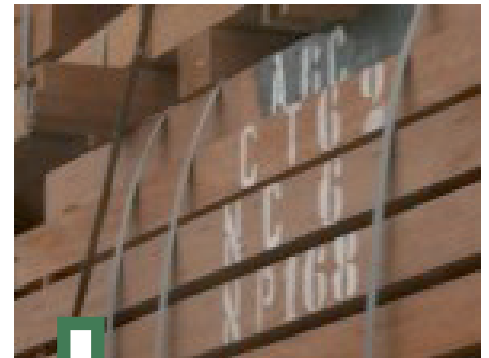
This trafficking directly involves MINFOF agents, in Yaoundé, who are the only ones able to deliver transport letters. Following a government mission to the port of Douala in October 2007, the Minister of Forestry asked several companies to justify the origin and legality of the timber present at the export yard. On 15 February 2008, 27 companies which did



**Timber load unmarked in front of the Topaze sawmill**

not respond to the request of the Minister of Forestry saw their activity temporarily suspended. On 17 March 2008, this suspension was lifted for 11 of these companies; however, the problem remained unsolved.

During this suspension period, we observed that it was still very easy for a company to export timber, even if it had just been placed under suspension (case 8).



Office:  
**illicit timber marks replacement**  
 Name of the illegal operator:  
**SOCIAA and ABC**  
 Location:  
**Eastern Province**

Case  
 nr 8

On Wednesday 20 February 2008, we photographed and took the GPS coordinates of a truck transporting moabi timber bearing the SOCIAA stamp (Societe Camerounaise des Industries alimentaires) near Kumba. This company is amongst the 27 companies whose activity was suspended on February 15. On Saturday 23 February 2008, we photographed this truck again at the entrance of Douala. The stamp indicated on the timber was now ABC: The SOCIAA stamp was covered with black paint and the stamp ABC painted over in white. The contract number (CT 62) is indicated on the timber and the plate of the truck (SWSR 02 471) are identical and prove the falsification. We followed this truck until the port of Douala and we recovered the transport letter which indicates Douala as origin though we first localized the truck in Kumba, 200 km north of Douala.

**Truck entering the port of Douala with the same moabi timber but marked ABC**



Transport letter trafficking also concerns companies with a logging permit which launder illicit timber. This is possible due to the lack of limits on volumes or origin stated on transport letters by the administration. At the entrance of one of the sawmills of Topaze Company, which belongs to a high executive in the forestry administration and who is a holder of a Timber Recovery Permit and a Vente de Coupe, we were able to observe several timber deliveries, waiting to be sawn, without any marks indicating their origin. It is illegal to transport timber without marks indicating its origin.



**Container loading prior to entering the port of Douala. No agent of Customs or the MINFOF was present.**

### **The fifth step: Timber enters the port of Douala**

At the port entrance, trucks must pass through the MINFOF checkpoint, where the transport letters (with the exporter's stamp), the validity of the logging title and the validity of the fiscal discharge are checked.

Once again, no match is made to compare authorized volumes for a permit with volumes declared with the MINFOF, for instance, or actual volumes that enter the port of Douala.

The fiscal discharge is a document from the Ministry of Finance indicating a quantity of timber for which the company has paid taxes and which it can therefore export. The Cameroonian fiscal system being a declaratory system, no comparison is made between the fiscal discharge received at the MINEFI and the volume declared by a company at the MINFOF. A company can pay to export 10,000 m<sup>3</sup> even if its legal supply contract that allowed it to obtain the exporter accreditation only concerns shorts and discarded wood!

It is this total lack of comparisons at any of the steps of the export line that allows transport letter trafficking and the laundering of illicit timber.

We also observed an area where wood was directly loaded into containers, just before the MINFOF checkpoint. No agent from the MINFOF or Customs was present during loading and closing.

These containers are then taken to another area of the port of Douala, the container loading port (Douala International Terminal), and exported without any check being performed. Illicit timber can then be exported without having to pay taxes.

### **The sixth step: Exporting the timber to Europe**

Once all these steps have been completed, timber is stacked at the timber yard (or at the container loading port) waiting to be loaded onto a ship.

During our missions, we observed at the port of Douala numerous timber parcels to Europe with the marks of companies involved in illicit exploitation.

In March 2008 we photographed ABC company timber bound for Antwerp and Dunkerque.

We obtained two export specifications and managed to identify two clients in France: The René Baroux France company in Dunkerque and the Tropica Bois company in Sète.

The specification was checked by the Douala port authorities and is therefore apparently legal. French Customs have no way of checking whether this timber is illegal. We also noticed several timber parcels from the SIM company bound for



**Timber from the ABC company (Case nr 8) for Dunkerque**



**Timber from the SIM company (Case nr 3) for La Pallice (La Rochelle)**



**Timber yard of the Compagnie Européenne des Bois at the port of Nantes**



**Zoom on timber of the SIM company**

European ports such as Amsterdam and La Pallice, but were not able to identify the name of the buyers, which is coded by a reference.

In April 2008, we subsequently went to the port of Nantes to try to identify a buyer. We found several parcels marked with the brand Sim at the yard of the Compagnie Européenne des Bois.

# Recommendations

## To the Cameroonian government

- Stop blocking the publication of sensitive reports by the Independent Monitor and follow up on their recommendations.
- Reorganize the granting of recovery and removal permits and reduce their number. Timber inventories must be systematically performed to determine the harvestable volume and to prevent fraud.
- Rigorously organize auction sales and centralize them on the MINFOF level to avoid collusion between local MINFOF agents and illicit operators.
- Set up an IT system at the MINFOF level to compare data on authorized volumes, declared volumes and exported volumes for valid forestry permits in order to detect illegal logging and timber laundering.
- Organize an independent mission or commission to fight against corruption and verify the mechanisms described in this report.
- Identify corrupt MINFOF agents and impose sanctions on them.
- Revise grant procedures for export permits to ensure traceability of all timber exported.

## For the European Union

- Adopt legislation that makes it a crime to place illegally logged or traded timber on the European market. The burden of proof should be on companies to demonstrate the legality of their timber.
- Refuse documents supplied by the Cameroonian administration (notably transport letters) as legal guarantees and support the development of a robust tracing system, accessible to companies of all sizes.
- Strengthen the Voluntary Partnership Agreement as a tool to achieve a real change in producer countries by tackling the root causes of illegal and destructive logging, notably the lack of recognition of land and user rights and bad governance.
- Include in all financial support: improved governance and combating corruption.

## To European importers

- Stop timber imports from 'small permits' and exporters without operating permits.
- Import only legally produced timber that is produced in a responsible way, such as FSC-certified timber.

# Appendix 1

An illicit Annual Operating Certificate: volumes for each tree species are not indicated and only an amount of 500 m<sup>3</sup> is mentioned. The operator can therefore choose to log 500 m<sup>3</sup> of assamela (a protected tree, registered in Appendix II of the CITES) or 500 m<sup>3</sup> of fraké or of alep, wood that has little value. This certificate has been signed by the former Minister of Forestry.

MINISTRE DES FORÊTS ET DE LA FAUNE  
**Certificat annuel d'exploitation**  
 Forêt communautaire N°12

N° 0061 / MIN/FOFA/DC/CF/CCE/AG

Entité juridique: Achuhua Village: Achuhua, mbou Arrondissement: Loue Exercice: 2005 Date émission: Janvier 2005 Fin validité: 31 décembre 2005

Partie 1: Localisation des traitements sylvicoles:

Département: Haut Nyong	Province: DSI	Traitements sylvicoles	
Blac/Secteur: /	Parcelle: /	Appellation: Coupe à diamètre limité et Transformation artisanale	Superficie de la série: 180 ha
Superficie totale de la forêt: 4490 ha			

La carte forestière jointe au plan annuel d'opérations montre la localisation précise de la parcelle (série) annuelle de coupe autorisée.

Partie 2: Essences à récolter

06 JAN 2005

Essences		DME	A	Nb	Volume (m3)	Essences		DME	A	Nb	Volume (m3)
Code	Appellation		m			Code	Appellation		m		
1104	Assamela	100				1213	Bongo	60			
1116	Iroko	100				1220	Fraké	60			
1121	Moabi	100				1346	Hemba	60			
1129	Sapelli	100				1124	Okan	60			
1201	Aiclé	60				1127	Pndouk	60			
1211	Ayou	80				1301	Abalé	50			
1111	Bibolo	80				1303	Abam	50			
1318	Bilinga	80				1202	Alep	50			
1107	Doussé	80				1230	Assouk	50			
1110	Dubinga	80				1312	Andok	50			
1214	Dalsena	60				1424	Assila	50			
1113	Doussé	80				1317	Bahia	60			
1118	Kossipo	80				1120	Douka	60			
1130	Sipo	80				1334	Esnien	50			
1135	Tiamn	80				1336	Eveves	50			
1106	Ibete	50				1231	Eyack	50			
Total					/	Total					/

Total général nombre: / Total général volume (FORFAIT) 500 m<sup>3</sup>

Les cartes d'itinéraire d'exploitation jointes au plan annuel d'opérations montrent la localisation des arbres à récolter

**Prescriptions:**

- Le titulaire de ce certificat annuel de coupe doit respecter les normes d'intervention en milieu forestier ainsi que les dispositions de son plan simple de gestion
- Seule la sortie des déblais est autorisée dans la forêt communautaire pour un volume ne pouvant excéder 500 m<sup>3</sup>
- Toute exploitation commerciale des produits forestiers non ligneux doit être conformes à la réglementation en vigueur
- Ce certificat est de lettres de volonte est délivré en 1 exemplaire

Le Ministre des Forêts et de la Faune  
 Le Ministre  
 The Mbongo  
 EGBE ACHUO Hillmann

Copie conforme du permis annuel d'opération

CFC - Cellule de la Foresterie Communautaire

# Appendix 2

Transport letters of logs of illegally felled aningré near Mbal-mayo by the SEF company and sold to the Ecam-Placage company. The yard of origin indicates 'Ngomedzap' which is situated around 60 km from the real exploitation site.

REPUBLIC OF CAMBODIA  
 Ministry of Forestry and Wildlife  
 DEPARTMENT OF FORESTRY

ROYAUME DU CAMBODGE  
 MINISTERE DES FORETS ET DE LA FAUNE  
 DIRECTION DES FORETS

**LETTRE DE VOITURE POUR LE TRANSPORT DES BOIS D'ŒUVRE (GRUMES)**  
**WAYBILL FOR THE TRANSPORTATION OF LOGS**

EXERCICE: Du 1er Janvier au 31 Décembre 2007  
 N° 04227871

SEF  
 NGOMEDZAP  
 701

AEB 1327 Date: 27/06/2007

(2) Bois de négoce  
 Wood for trade

Nom de l'acheteur: ECAM PLACAGES Parc de provenance: NGOMEDZAP

Nom du transporteur: ETS NGUEITEGNE Son N° de contribuable (NIU): 0118000194631  
 His Taxpayer Identification No.:

Matriculation du camion: CEJK 0112A

Désignation du bois (usine, port, parc à grumes, autre): ECAM PLACAGES 11Byo  
 Wood Destination

Les photocopies ne sont pas acceptées

ESSENCES		N° DE LA GRUME Log N°	LONGUEUR Length	MOYEN GROS BOUT (CM)	MOYEN PETIT BOUT (CM)	VOLUME	PROVENANCE (1)	Ref. Code à barres Code barre ref.
Nom commercial Name	Code							
Aningré	12070155H77-0611	0511	11.00	68	64	3.872		
		0511	12.00	61	54	3.062		
		0512	9.00	54	52	1.996		
		0611	12.20	64	47	5.005		
		0712	13.90	65	57	4.062		
		0811	15.90	60	48	3.377		
		0911	11.00	87	61	4.431		
		1011	9.50	83	65	4.286		
		0112	5.70	52	45	1.025		
Aningré	12070155H77-1111	10.30	63	60	3.010			
TOTAL						32.272m <sup>3</sup>		

10 Billes - CUBANT

OBSERVATIONS:

Signature à l'arrivée  
 Signature at point of arrival

29/6/07

EXPLORANT



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