

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES
OF WILD FAUNA AND FLORA

Seventy-seventh meeting of the Standing Committee
Geneva (Switzerland), 6–10 November 2023

Compliance

APPLICATION OF ARTICLE XIII IN CAMEROON

1. This document has been prepared by the Secretariat.

Introduction

2. *Pericopsis elata* (Fabaceae), known under the trade name of Afrormosia or Assamela, is a large tree species that occurs in dense humid tropical forests. It has high commercial value and is very popular in international trade because of its high-quality timber. Since 13 September 2007, the listing of the species in Appendix II has included logs, sawn wood and veneer sheets. Cameroon ratified CITES on 5 June 1981 and the Convention entered into force on 3 September 1981.
3. In Cameroon, the natural area of distribution of *Pericopsis elata* is estimated to comprise 5,545,425 ha. *Pericopsis elata* is exploited through four main logging titles: forest concessions (known as forest management units or FMUs), communal forests, community forests and *ventes de coupe* (also known as sales of standing volume). A detailed explanation of these titles is provided later in this document. As the CITES Management Authority, the Ministry of Forests and Wildlife (MINFOF, *Ministère des Forêts et de la Faune*) is in charge of allocating harvest volumes and monitoring and controlling the entire supply chain.
4. In June 2021, the Secretariat received information from several Parties regarding various irregularities in trade in *Pericopsis elata* from Cameroon. *Pericopsis elata* is listed in Appendix II of the Convention and subject to annotation #17, meaning that the listing applies to logs, sawn wood, veneer sheets, plywood and transformed wood. Moreover, under the national legislation of Cameroon, it is forbidden to export logs of *Pericopsis elata* from Cameroon and only exports of processed wood are allowed.
5. At its 74th meeting (SC74; Lyon, March 2022), the Standing Committee adopted the following decision regarding trade in *Pericopsis elata* and other species from Cameroon:
 - c) *noted the information provided on Pericopsis elata from Cameroon and requested the Secretariat to further investigate this case and make recommendations to the Standing Committee.*
 - d) *according to Article II, paragraph 1, articles IV and VI and Resolution Conf. 12.3 (Rev. CoP18), the Secretariat shall continue to keep close communication and strengthen the cooperation with Cameroon on this potential case and seek an invitation from Cameroon to provide in-country assistance, conduct a technical assessment and a verification mission to understand how the CITES authorities ensure that timber species are legally acquired and exported in full compliance with CITES. The Secretariat shall present its findings and recommendations to the 75th meeting of the Standing Committee (SC75).*
6. In accordance with the general principles of the CITES compliance procedures laid out in Resolution Conf. 14.3 (Rev. CoP19) on *CITES compliance procedures*, a supportive and non-adversarial approach is taken by the Convention toward compliance matters, with the aim of ensuring long-term compliance. Compliance matters are thus considered and ensuing compliance measures are applied in a fair, consistent and transparent manner.

Invitation to conduct a technical assessment and a verification mission

7. Following the 74th meeting of the Standing Committee, the Secretariat sent a letter to the CITES Management Authority of Cameroon on 24 August 2022 communicating the recommendation by the Standing Committee to seek an invitation from the Management Authority to provide in-country assistance and conduct a technical assessment and a verification mission. On 6 September 2022, Cameroon responded by inviting the Secretariat to conduct a technical mission in the country.
8. Following the invitation received from the Cameroon authorities, the CITES Secretariat conducted a technical mission to Cameroon from 12 to 18 March 2023. Field visits were made to a forest management unit (FMU) owned by PALLISCO logging company, specifically an active logging unit and its timber processing plant in the sites of Mindourou and Lomié, respectively. SEPBC, the Société d'Exploitation des Parcs à Bois du Cameroon (Port of Douala) and its various log yards were also visited. Next, the Secretariat visited the timber processing plant of the SEFECAM company in Douala. The Secretariat met and interviewed representatives of local and national sectoral authorities and administrations as well as the main private companies involved, unions representing the private sector, civil society stakeholders and the technical and financial partners operating in Cameroon.
9. The Secretariat thanks Cameroon for its excellent cooperation within the framework of the technical mission. It also thanks MINFOF and its *Direction des Forêts* (Forest Department), as well as the *Ecole Nationale des Eaux et Forêts*, the *Institut Supérieur d'Agriculture, du Bois, de l'Eau et de l'Environnement* (ISABEE) and the *Agence Nationale d'Appui au Développement Forestier* (ANAFOR) for the technical and logistical support provided to the Secretariat during its mission for planning and coordinating the visits.
10. MINFOF is in charge of the implementation of forest policy, the legislative framework for forests, forest law enforcement and international conventions concerning forests and wildlife, including CITES. MINFOF has three main technical departments in charge of forest-related issues: the *Direction des Forêts*; the *Direction de la Promotion et de la Transformation des Produits Forestiers* (Department of Promotion and Processing of Forest Products) and the *Direction de la Faune et des Aires Protégées* (Department of Wildlife and Protected Areas). There is also a department in charge of monitoring issues regarding diplomacy, cooperation, treaties, agreements and conventions in relation to the forest and wildlife subsector which works closely with the technical departments: the *Division de la Coopération et de la Programmation* (Cooperation and Programming Division).
11. Several meetings and visits were organized in Yaoundé, Mindourou and Douala with members of CITES authorities at national, provincial and local levels and relevant stakeholders (i.e. sectoral administrations, the private sector, civil society, and technical and financial partners). During the mission, the Secretariat was officially received by the Minister of Forests and Wildlife. The Secretariat had more detailed and technical interviews with the directors in charge of fauna and flora and officials dealing with CITES-related issues in the forest administration. A broader working session with the participation of other sectoral administrations (i.e., finance, justice and trade) took place in Yaoundé. The Secretariat also held several technical discussions with the CITES Scientific Authority. During its stay in Douala, Cameroon's largest port city, the Secretariat also took the opportunity to discuss other matters related to controls and enforcement with the Customs Service and the regional offices of MINFOF in charge of implementing export procedures. The Secretariat thanks the representatives of the national, provincial and local authorities and of the private sector, civil society and technical and financial partners who took the time to meet with the Secretariat and provided relevant detailed information in an honest, open and courteous manner.
12. According to the information provided to the Secretariat, Cameroon has a forest cover of 22.5 million hectares (46% of the national territory), with an exploitable surface area of 14 million hectares. The annual forest production of the country is estimated to amount to 2.5 million m³ of legal timber placed on the market per year. The average harvest per hectare is 2 to 3 stems of about sixty species out of more than 300 inventoried. In socioeconomic terms, the forestry sector accounts for 4% of the gross domestic product (GDP) excluding oil and represents over 300,000 jobs of a permanent, temporary or informal nature. Annual revenue from forestry taxes exceeds XAF 13.2 billion and the value of export earnings amounts to about XAF 218 billion, of which XAF 64.2 billion contribute to public revenue.
13. The authorities of Cameroon explained that, because of the listing of certain timber species in CITES Appendix II at COP19, even though some of them are abundant and not threatened in Cameroon, appropriate measures were being taken to ensure the implementation of CITES provisions while allowing commercial trade, considering the socioeconomic issues related to the species concerned. To this end, the Management Authority announced during the mission that it had developed new guidelines and procedures

for the export of processed and semi-processed wood of these species. The teams of the Management Authority in charge of CITES issues had been reorganized and better coordinated, and the Scientific Authority for flora had also been reorganized and its tasks had been divided between three public bodies.

14. The Secretariat noted that the Government had the political will to create safe and favourable conditions for sustainable use and legal trade in Cameroon and was taking action in this regard. However, it also notes that Cameroon is still one of the countries of Central Africa with the highest volumes of timber trade and that major challenges remain, particularly regarding capacity building to control the hundreds of trucks loaded with wood on the roads of the country in transit from neighbouring States.

Identification of potential compliance matters regarding trade in *Pericopsis elata* from Cameroon

15. As mentioned in paragraph 5 above, the Secretariat wrote to Cameroon about trade in *Pericopsis elata*. The letter focused on the following points:
 - a) the making of legal acquisition findings and internal controls on the legal origin of the timber with regard to the logging titles;
 - b) export permits issued for specimens of *Pericopsis elata* from Cameroon that do not seem consistent with the non-detriment findings and relevant annual quotas;
 - c) CITES documents allegedly forged and illegally traded to facilitate trade in *Pericopsis elata*.
16. To consider the first point (a), the Secretariat divided it into three components. The first deals with the logging titles; the second is related to the permit issuance process and the verification of legal acquisition; finally, the third component refers to the information system and controls at the port of shipment prior to the export of the goods. All these issues regarding legality and controls could be summarized into a traceability system.

Logging titles and their mode of allocation

17. The management of forests in Cameroon is governed by Forest Law No. 94/01 of 20 January 1994 (articles 20-39) and its implementation decrees. The law divides the forest zone into two main types of domains or estates, namely the permanent domain and the non-permanent domain. The permanent domain is composed of state forests (*forêts domaniales*,¹ articles 24 to 29 of the Forest Law) and communal forests, which fall under the private domain of the State and of municipalities, respectively. As regards logging titles and their mode of allocation, the Secretariat listened to several presentations by the officials in charge of the Management and Scientific Authorities explaining both types of forest domains (i.e. permanent and non-permanent), their denomination, duration and mode of allocation. There are two types of permanent forest domains: forest management units (FMUs) and communal forests.
18. Forest management units: FMUs are the basic territorial unit of forest management with a maximum of 200,000 hectares allocated per concession; they are managed through a management plan covering a 30-year rotation. Commercial exploitation of CITES-listed tree species mainly takes place within the permanent forest domain through logging agreements (i.e. concessions), which are granted to domestic and foreign companies through a competitive bidding process. These concessions may include one or several FMUs. Currently, there are reportedly 121 approved FMUs in Cameroon. The title granted is an annual operating permit (PAO, *permis annuel d'opération*).
19. Communal forests: this second category corresponds to forest titles or production forests that fall under the permanent forest domain. Managers of these titles must prepare a management plan with proposed management measures. An annual operating plan (PAO, *plan annuel d'opération*) is also required in communal forests. This document, combined with the application to log a certain volume of timber, leads to the issuance of an annual logging certificate by the Minister. The logging volume is requested by the manager of the communal forest (i.e. the mayor of the municipality) on the basis of the results of a logging (i.e. systematic) inventory in a specific annual plot. Exploitable resources are stems selected according to the minimum exploitable diameter. After obtaining an annual logging certificate, the manager of a communal forest must travel to the region to apply for an authorization to start logging activities from the Regional Delegate (the representative of the Minister in the region) in charge of forests and wildlife. Only after receiving

¹ The term *forêts domaniales* comprises wildlife protected areas and designated forest reserves; the latter include forest land with various types of uses.

this formal authorization and the positive advice of the head of the local MINFOF forestry post is it possible to start to harvest the timber in the logging unit. There are reportedly 72 communal forests in Cameroon today. The permit granted is also an annual operating permit (PAO).

20. Regarding the non-permanent forest domain (i.e., forest lands that may be allocated to other single or multiple uses such as agriculture, etc.), there are three types of logging titles or supply sources: *ventes de coupe*, community forests, and the sale of timber by public auction. *Ventes de coupe* are logging permits issued for a short term (one year, renewable twice – 59 have been granted for 2023) based on volume and corresponding to the non-permanent forest domain. These permits, granted through a competitive bidding process, must not exceed 2,500 hectares. No management plan is required. However, some specifications are established including general clauses (on the technical aspect of the logging operation) and specific clauses related to taxation and social issues. The permit granted is an annual logging certificate (CAE, *certificat annuel d'exploitation*).
21. Community forests differ from communal forests in that they are located in areas within the non-permanent forest domain for exclusive use by village communities. A village community seeking to apply for a logging permit identifies a zone not exceeding 5,000 ha on which it has customary rights and submits an application to the Government. Once the application has been approved, a non-renewable two-year probationary agreement is signed between the Government and the association established by the community. During this period, the community develops a basic management plan. Once the management plan has been approved by MINFOF, the community can sign a definitive agreement for a duration of 25 years (renewable). There are 693 community forests and the permit granted is an annual logging certificate (CAE).
22. Finally, the authorities mentioned the sale of timber by public auction. In this case, the timber is sold by the State and the buyer receives a “purchase of timber by public auction” certificate (CVEPB, *certificat de vente aux enchères publiques de bois*). This is an authorization to harvest timber from areas designated for development projects (e.g. agricultural projects, road construction, hydroelectric dams) or to collect illegal timber seized by the State.

Issuance of CITES permits and verification of legal acquisition

23. Regarding the issuance of permits, the authorities clarified the following: it is the economic operator wishing to export the wood acquired according to the different types of logging titles who applies for a CITES permit specifying the quantities requested and their destination. The applicant must prove that the timber products to be exported were harvested sustainably and in accordance with the national regulations in force by submitting the required documents (e.g. PAO, CAE, CVEPB, etc.). These documents are key to verify the legal acquisition of CITES timber in Cameroon.
24. Once the applicant has submitted a stamped application, the authorities verify the legality and traceability of the shipments ready for export that correspond to the permit application. The competent officials verify the information on the supply sources (the title, that is, the PAO, CAE, CVEPB, etc.) and the waybills generated by the SIGIF2 information system (the second generation of the Computerized Forest Information Management System) and used for the transport of the specimens concerned. When reviewing the sources, they must verify whether it is a source operating as a sole trader or in partnership.
25. It should be noted that, for the transport of logs and sawn wood, operators must obtain secure waybill books. For each shipment of logs or sawn wood, a waybill must be used and signed by the competent authorities present when the truck is loaded at the place of departure. The waybills list each product's reference number (i.e. logs and sawn wood), dimensions and volume, species, place of departure and destination, identification of the truck, driver, etc. The details of the transported logs on this waybill need to match the details in the DF10 log production report or *carnet de chantier*, an administrative logbook with 25 sheets where logging activities are recorded; each sheet has 30 lines, generated by the SIGIF2. All the tree stems logged should be recorded in the DF10. A log is the trunk of a felled tree, stripped of its crown and branches.
26. Logs received by the processing facility are recorded in a factory wood entry register. Processing plants must be in possession of a certificate of registration as a wood processor demonstrating their legal existence as a processing facility. To export timber, the exporter must be registered as a timber exporter and in the possession of a timber export authorization covering the specific batch.
27. After checking the documents, the authorities verify the availability of export quotas set in the valid NDF made by the Scientific Authority. NDFs are published and there is a database to monitor the use of the

quotas. It should be noted the NDF for *Pericopsis elata* in 2023 was made by ANAFOR, one of the Scientific Authorities of Cameroon.

28. The next step is to verify other elements related to the legality of the forest operation concerned, specifically a valid tax clearance certificate from the authorities, the absence of pending litigation (summary of offences) and valid registration as an exporter of timber.
29. Next, operators must pay the fees required for the issuance of CITES permits in accordance with the financial law in force and must submit proof of payment.
30. Once all these procedures are completed, MINFOF issues the CITES export permit and the corresponding certificate of origin that is attached to it. Permits are granted for specific shipments, cannot be transferred, and have a validity of six months from their date of issuance. CITES permits can only be issued for processed or semi-processed wood. The certificates of origin that always accompany CITES export permits indicate the annual quota for the FMU concerned, the number of specimens exported to date and the remaining part of the quota. In the past, certificates of origin only mentioned the total annual quota for Cameroon.

Information system and controls at the port of shipment

31. SIGIF1 and SIGIF2 – between 1996 and 1997, donors funded the creation of a *Système Informatique de Gestion des Informations Forestières* (SIGIF, Computerized Forest Information Management System) aimed at better managing timber production and related issues, such as the surface of logging titles, the taxes based on surface area, active permits during a financial year and different types of technical information. The SIGIF was also aimed at supporting the monitoring of activities related to enforcement of forest law. The SIGIF (in its first version – SIGIF1) was installed at MINFOF in 1998.
32. The development of an improved version of this information system was an integral part of the negotiations on the FLEGT Voluntary Partnership Agreement (VPA) signed by Cameroon and the European Union on 6 October 2010 to improve forest governance and sustainable forest management. The establishment of a Timber Legality Assurance System (TLAS) is an essential precondition for the implementation of the FLEGT VPA.
33. The first attempt to launch the improved SIGIF2 was not satisfactory due to problems with the design, operationalization and other technical limitations related to the software, limited access to electricity and internet connectivity and other issues. MINFOF relaunched the process to solve these problems, enable a paper-free management of procedures and monitor the entire chain of custody from standing timber to the port of shipment, guaranteeing the legality of forestry activities. This system should also enable the issuance of a “legality document” that would be very similar to a legal acquisition finding.
34. This improved version of the system (SIGIF2), which is supposed to be more effective and ambitious, is considered the cornerstone of sustainable forest management in Cameroon. According to the authorities, SIGIF2 is aimed at managing and monitoring forest exploitation, ensuring timber traceability and combating illegal activities. The system is composed of two elements: the timber traceability system and the legality of forestry activities. These two elements are the pillars of the making of non-detriment findings. According to the explanations of the authorities, SIGIF2 is a platform for communication between the forest administration and the companies of the forestry sector. It starts with the logging inventory, which is conducted by counting every tree in a logging unit or *assiette de coupe* (ranging between 1,500 and 3,000 hectares approximately). The aim of the system is to ensure that no information escapes the controls of the timber market in Cameroon.

Visit to the PALLISCO company in Mindourou

35. On 14 March 2023, the Secretariat visited a logging site and processing plant for *Afrormosia* (*Pericopsis elata*) belonging to the PALLISCO company in Mindourou to understand how the system works on the ground. This company holds the concession of the two FSC-certified FMUs.
36. At the site of PALLISCO, the Secretariat tested the operation of some modules of the SIGIF2 *in situ*. During the visit to the logging site, the operators explained the entire chain of custody, the various documents required and how the SIGIF2 works. They explained the operational modules of the system starting with the log production report. These reports have a number and manual data are entered into the SIGIF2. This makes it possible to enter all the parameters of each tree (especially log length, diameter and volume) into the system. Logs can only be removed from the forest on the basis of this data entry. If a log is not recorded

in the SIGIF2, in theory it would not be possible to transport it elsewhere because each log has its own barcode.

37. The information system as presented seems to be an innovative approach and a feasible model for countries that do not have a timber traceability in place yet. However, during the mission some individuals stated that the SIGIF2 in its current version is unfinished and insufficient to fulfil the purpose it was designed for. In addition, the European Union, which funded the project jointly with Germany, does not recognize the current version of the SIGIF2 because it does not correspond to the criteria established initially (<https://www.atibt.org/en/news/12967/position-of-european-partners-on-sigif-2-in-cameroon>). Yet, the Management Authority mentioned that both parties have agreed to conduct a joint evaluation (i.e. audit) of this system before the end of 2023.

Visit to the port of Douala

38. After Mindourou, the Secretariat visited the port of Douala to meet the provincial authorities, customs authorities and other operators and understand the controls of exports at the port of shipment. The authorities explained that the timber products to be exported originate directly from logging titles or a timber processing plant (*unité de transformation du bois*, UTB). Timber from Cameroon can only be exported by registered exporters of logs or transformed wood. The process for exporting timber differs depending on two parameters: the type of product (i.e. logs or sawn wood) and the choice of export mode (i.e. in bulk or in containers). Considering that Cameroon can only export processed or semi-processed wood, the Secretariat wonders whether the export of logs complies with the legislation in force.
39. All the documents issued for authorizing the export of timber are verified at different levels. This involves at least 15 documents, namely:
 - a) certificate of registration as an exporter of processed wood;
 - b) authorization to export sawn wood of a thickness exceeding 15 cm (if applicable);
 - c) valid tax clearance certificate from the authorities;
 - d) duly completed booklet of specification bulletins on timber for export (BSE, French acronym);
 - e) SIGIF2 timber processing plant-autonomous port of Douala waybills;
 - f) title or annual operating permit for the current financial year;
 - g) notification of the start of activities corresponding to the title;
 - h) notarized contract (if appropriate);
 - i) invoices for the purchase of the timber;
 - j) certificate of stocks;
 - k) specification of timber for export;
 - l) CITES permit for the species concerned;
 - m) certificate of origin;
 - n) container loading report;
 - o) container loading certificate;
40. The timber exporting procedure begins at the Société Générale de Surveillance (SGS) inspection company with a timber export declaration submitted by the exporter and controlled by SGS. Once SGS has conducted its controls, this step leads to the calculation of export duties and taxes, recorded in a document known as *Bordereau de Taxation à l'Exportation des Bois* (BTE). This allows the exporter to continue the procedure with the forestry administration.
41. Next, the Secretariat visited the timber terminal at the Autonomous Port of Douala, formerly administered by the Société d'Exploitation des Parcs à Bois du Cameroun (SEPBC), to visit two types of premises: timber yards known as *parcs commerciaux* and loading docks. Timber yards are the places where all the timber is stored prior to its export from Cameroon. Importantly, the timber not only originates from Cameroon but also from other countries of the subregion such as the Congo and the Central African Republic. *Parcs commerciaux* are timber yards that contain wood not destined for a particular ship. The owners of the timber still have the right to do as they please with it; for example, they can still sell it, find a ship, etc. These premises contain undeclared timber and the client has a free time period of 60 days to sell the timber or make various transactions. There is also the loading dock for the wood that is destined for a known and expected ship. The timber has already been subject to all customs controls and formalities and is in a customs bonded area. Clients have a free time period of 30 days for this category of timber.
42. The Secretariat would like to raise the attention of the Standing Committee about the undeclared wood that enters the *parcs commerciaux* of the port of Douala awaiting to be sold. The possibility of stocking timber that is not yet destined for a particular ship during several weeks or even months in these premises seems

to create a problem regarding the control of the volumes of timber that enter the port of Douala and the corresponding volumes shipped complying with all customs formalities. The Secretariat would like to receive more information on the measures proposed to reduce the possibilities of leaks and of mixing illegal and legal timber in these premises.

Export permits issued for specimens of Pericopsis elata from Cameroon that do not seem consistent with the non-detriment findings and relevant annual quotas;

43. To illustrate this point, the Secretariat wishes to raise a specific case reported by a State of import of wood from Cameroon about four CITES export permits (nos. 0189, 0190, 0192 and 0191) issued on 24 June 2021 for the export of a total of 963.6 m³ of sawn wood of *Pericopsis elata* (Afromosia).
44. Based on the information provided in the different CITES export permits, the Secretariat observed the following:
 - a) the exporter was the Société de Transformation du Bois de la Kadey (STBK);
 - b) the timber originated from FMU (forest management unit) no. 10,005; and
 - c) the PAO (annual operating permit) mentioned on the four CITES export permits had number 2692 and was dated 22 November 2021. It referred to the use of annual quotas nos. 5-4 and 5-5, that is, the estimation of the harvestable volumes of the various tree species present in annual logging units 5-4 and 5-5 of FMU 10,005 for that logging year.
45. The Secretariat reminded the authorities and operators that an export permit could only be issued if the scientific authority had issued a “non-detriment finding” and if the Management Authority had verified the legal acquisition of the specimens. In the absence of these two key requirements, trade cannot be authorized and the permits should not be issued.

CITES documents allegedly forged and illegally traded to facilitate trade in Pericopsis elata

46. It is important to note that in Cameroon there are 19 traceability checkpoints connected to the SIGIF2 that cover the territory and all the points of exit of timber from Cameroon. Every truck must go through these checkpoints to transport the logs and sawn wood from the forest to the sawmills and finally to the ports of Douala or Kribi. The purpose of these checks is to ensure that the law is respected and to prevent the transport of illegal timber. Apart from these obligatory checkpoints, there are conventional forest checkpoints in the different *arrondissements* (districts), some of which are mixed checkpoints staffed by the police, the gendarmerie and customs. However, these strict measures do not seem sufficient to prevent the transport of illegal timber from forests in Cameroon to sawmills and subsequently to international markets. According to the information provided by several contacts, this unlawful activity involves companies, businesspeople, politicians and senior army officials.
47. Regarding the legality of timber acquisition, the Secretariat reminded the authorities that the issuance of an export permit certifies that the specimens it refers to were legally acquired. It is on the basis of these documents that the governmental authorities of other countries decide to authorize the import of the specimens or not and issue re-export certificates or not. It is imperative for the facts to be established in compliance with CITES provisions and for data to be accurate and reliable, failing which, the authentication of CITES permits would be a simple formality that does not certify legal acquisition or sustainable harvest; yet, these are the two major objectives of the Convention.
48. The authorities also mentioned difficulties they faced in the process, such as poor understanding of CITES procedures by certain exporters and the need for ongoing capacity building and awareness raising. The Government also recognizes that there have been cases of document fraud perpetrated by careless exporters. This calls for the strengthening of forest governance through the full operationalization of all the modules of the SIGIF2, such as the module aimed at managing timber exports, and for a better control and traceability strategy, supported by close collaboration between customs, the Ministry of Justice, the Ministry of Trade, etc. The Management Authority did not verify the dossiers before issuing the export permits, even though it is its duty. The Secretariat considers that, to deal with careless exporters, it is important for the Management Authority to increase its vigilance and diligence in the legal verification of dossiers to ensure that its findings are consistent with the recommendations of Resolution Conf. 18.7 (Rev. CoP19) before issuing export permits.

Main observations of the technical mission

49. The Secretariat congratulates the authorities of Cameroon for establishing the existing framework, which could serve as a model for other States that have to develop a system to manage forests and monitor the entire chain of custody from standing trees to the port of shipment.
50. During the technical mission conducted in March 2023, the Secretariat identified certain strengths, which were mentioned in the previous paragraphs, but also significant challenges in the management and regulation of international and cross-border trade of CITES-listed timber species. For example, the Secretariat noted with concern the institutional conditions under which the Management Authority operates: lack of staff, material and spaces to receive the public. The Secretariat had to meet with the official in charge of filling out the permits in the hotel lobby because of the lack of an appropriate place to meet at the Ministry. In addition, three new Scientific Authorities have been designated to deal with plant-related issues: the *Ecole Nationale des Eaux et Forêts*, the *Institut Supérieur d'Agriculture, du Bois, de l'Eau et de l'Environnement* (ISABEE) and ANAFOR. These institutions are supposed to work in a coordinated way in the making of NDFs for all the timber species included in the CITES Appendices.
51. The Secretariat considers that the traceability system (i.e. chain of custody) should be strengthened to ensure the traceability of timber and guarantee its legal origin for all types of forests. So far, it seems that the SIGIF2 information system is progressively evolving in this direction, but especially for industrial exploitations. The major challenge is to set up a system that satisfies the needs of the other types of exploitations with low financial or technological capability that seem to escape controls, given that timber ends up at the port of shipment with no traceability.
52. The Secretariat also believes that the legality of trade should be closely linked to the issuance of non-detriment findings (NDFs). At present, controls may be weak in certain checkpoints and gaps in the current legislation are loopholes exploited by national and foreign players involved in timber trade to export timber produced in accordance with national legislation but in violation of the Convention.
53. The authorities of Cameroon have reported the difficulties caused by the requirements of some States party to the Convention, which Cameroon considers contrary to or inconsistent with domestic regulations. These requirements lead to the rejection of CITES export permits issued in due form by the competent authority. More specifically, the Management Authority mentioned the example of the European Union, which questions the forest management principles adopted by Cameroon. For example, the EU requires the recovery rate to be calculated at the scale of annual logging units, thus imposing new exploitable diameters different from those set by the administration and those approved during the management. An annual logging unit (*assiette annuelle de coupe*) is the area intended to be harvested in one year according to the annual operating plan (PAO). Cameroon complains that importing countries show a lack of understanding of certain management principles set by the national legal framework, which leads to delays in the delivery of import permits, with financial implications for the operations; in some inquiries, even validated management plans are questioned.
54. Some importing countries have expressed the wish that, as a CITES-listed species, *Pericopsis elata* be considered in management plans as a managed species. According to them, this would imply an individual recovery rate greater than 50%, as is already the case in some management plans.

Short analysis of the conditions applicable to trade in CITES-listed tree species

55. The Secretariat notes a considerable disparity in the levels of implementation and control depending on the type of forest domain (i.e. permanent or non-permanent), their denomination, duration and mode of allocation. The logging sites visited seem to be good examples of the implementation of the Convention. As regards the exploitation, traceability and legality of timber, the activity seems compliant with CITES Article IV and the guidelines and interpretations provided in the resolutions on timber trade. However, the multiplicity of titles and modes of allocation creates a considerable level of complexity that can generate gaps in the various links of the chain of custody.
56. As a result, it is essential to explore information systems more adapted to all types of logging titles and their mode of allocation and not only fit for FMUs. This issue also has a socioeconomic component considering the objectives reported by the Government of enabling a sustainable forest exploitation that also benefits communities and not only major foreign or domestic companies.

57. Based on the documents and information provided during the mission, the Secretariat considers that the existence of several parallel regimes applicable to international timber trade, each with its own requirements, adds an additional degree of complexity. The Secretariat understands that the FLEGT VPA is completely independent from CITES and thus that the wood covered by a CITES export permit does not require a FLEGT licence. CITES timber is not subject either to the requirements of the EU Timber Regulation, which is aimed at ensuring that no timber of illegal origin is placed on the EU market. Nevertheless, the SIGIF2 and controls at the port of shipment are useful for all these regimes governing international timber trade. Considering the above, the Secretariat wonders whether these regimes are complementary and a greater coordination regarding the requirements of importing countries might be necessary.
58. Concerning law enforcement, the Secretariat considers that the verification of concessions is a major indicator of progress. Yet, it recommends that the Government only authorize exports of timber from verified logging titles and conduct a review of all the modes of allocation as soon as possible.
59. Considering the limited time available during the mission, some points were not the subject of detailed discussions. However, capacity building of CITES authorities is an important element.
60. Moreover, the Secretariat believes that cooperation with neighbouring countries is key and that it can take place in the framework of the Commission of Central African Forests (COMIFAC). This cooperation could include the sharing of scientific information and intelligence to combat illegal trade. The Congo and the Central African Republic could conduct joint inspections of their shared borders and discuss the problem of cross-border transport of illegal wood in bilateral commissions.
61. As a result, although the Secretariat collected relevant information and held several important meetings during its technical mission in March 2023, additional work is needed to make a final decision on the allegations of possible irregularities in trade of *Pericopsis elata* from Cameroon. For this reason, the Secretariat recommends to the Standing Committee the renewal of its mandate to conduct a second technical mission to Cameroon and gather further information. It would be desirable for the mission to also include neighbouring countries and importing countries to facilitate a multilateral dialogue on issues for which there are still different views or interpretations.

Recommendations

62. In light of the above, the Standing Committee may wish to make the following recommendations:

Regarding management of trade in specimens of Pericopsis elata

- a) Cameroon shall strengthen the CITES Management Authority and Scientific Authorities by building their capacity in the area of forestry and providing them with enough modern means to do their work, including issuing permits, controlling traceability, surveying populations of *Pericopsis elata* and other CITES-listed tree species to make non-detriment findings, setting annual export quotas before authorizing trade in specimens of CITES-listed tree species, and building administrative and scientific capacity at the national level.

Regarding legislation and law enforcement

- b) Cameroon shall strengthen the regulatory framework on forest management, in particular, to address any gaps and loopholes that could result from the multiplicity of logging titles and modes of allocation. Cameroon shall also adapt the relevant regulatory provisions to ensure that all CITES-listed timber species are considered as “managed” species in management plans of forest titles within the permanent domain so that a recovery rate of at least 50% can be applied to them.
- c) Cameroon shall consider developing and implementing an enforcement strategy and related policies regarding illegal trade in tree species and strengthening its efforts to ensure full compliance with the Convention.
- d) Cameroon shall assess relevant authorities’ law enforcement capacity, mandates and needs to strengthen the control of trade in CITES-listed species and the fight against transnational organized forest crime. Based on this assessment, Cameroon shall build the capacity of enforcement bodies to increase CITES controls on the basis of risk-based management strategies, particularly the

control of the *parcs commerciaux* in the ports of Douala and Kribi, and to combat transnational organized forest crime.

- e) Cameroon shall establish a national platform for cooperation and coordination between competent enforcement authorities to strengthen the control of trade in CITES-listed species and to combat transnational organized forest crime, in accordance with paragraphs 9 a) and b) and Annex 3 of Resolution Conf. 11.3 (Rev. CoP19) on *Compliance and enforcement*.
- f) Cameroon is invited to encourage companies to use innovative technologies to monitor timber and apply best practices to prevent illegally sourced or illegally traded timber from entering their supply chain.

Regarding issuance of export permits and SIGIF2 information systems

- g) Cameroon shall finalize the development of the SIGIF2 as an effective information system (subject to the availability of resources) to facilitate the issuance of CITES permits and certificates and the verification of legal acquisition of specimens in trade for all the modes of allocation of logging titles, while making it more difficult to tamper with CITES permits and certificates after their issuance.
- h) Cameroon shall facilitate liaison and integration with other permitting/certification systems relating to the harvest of and trade in CITES-listed species, for example, concession authorizations, phytosanitary documentation, or customs declarations.
- i) Cameroon shall ensure that export permits and re-export certificates are endorsed, with quantity, signature and stamp, by an inspecting official such as a customs official and not by the Management Authority, in the export endorsement block of the document.

63. The Secretariat also suggests that the Standing Committee recommend to the Secretariat and the importing countries to keep close communication and strengthen cooperation with Cameroon to better understand the different requirements and expectations regarding the implementation of forest regulations and to fully support the actions undertaken by Cameroon to implement these recommendations. The Secretariat also requests Cameroon to invite it to provide in-country assistance and conduct a second technical assessment and a verification mission with a representative of the Plants Committee and representatives of importing countries, the United Nations Food and Agricultural Organization (FAO) and the International Tropical Timber Organization (ITTO), to review progress in implementing the recommendations contained in paragraph 62. Subject to the availability of external funds and human resources to implement this work, the Secretariat will present its conclusions and recommendations at the next meetings of the Standing Committee.
64. Cameroon shall report to the Secretariat on progress made in the implementation of these recommendations 90 days before the 78th meeting of the Standing Committee (SC78), in order for the Secretariat to convey its report and its comments to the Standing Committee. The Standing Committee shall review progress made by Cameroon and decide if sufficient progress has been made or if compliance measures should be recommended, in accordance with paragraphs 29 or 30 of Resolution Conf. 14.3 (Rev. CoP19) on *CITES compliance procedures*.