

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

Seventy-fourth meeting of the Standing Committee
Lyon (France), 7 - 11 March 2022

Interpretation and implementation matters

General compliance and enforcement

Wildlife crime enforcement support in West and Central Africa

REPORT BY SENEGAL

1. This document has been submitted by Senegal (Management Authority).*
2. This document was formulated in response to Decision 18.92 a), directing the Standing Committee to “consider the report from the Secretariat in accordance with Decision 18.93, paragraph d) and progress made by Parties in West and Central Africa in strengthening CITES implementation and make further recommendations as appropriate...”.

Background

3. The Government of Senegal has been actively involved in the listing of *Pterocarpus erinaceus* (*P. erinaceus*) on Appendix III and II of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). The transfer of *P. erinaceus* from Appendix III to Appendix II at the 16th meeting of the Conference of the Parties (CoP16) in 2016 was proposed by Senegal and co-sponsored by seven range States (Benin, Burkina Faso, Guinea, Guinea Bissau, Mali, Nigeria, Togo) and one additional African non-range State, Chad. Taking into consideration the regional awareness regarding the risks associated with the trade in *P. erinaceus*, the Government of Senegal wishes to bring to the attention of the Standing Committee the concerning situation with regard to the persistence of what appears to be ongoing illegal international trade in *P. erinaceus*.
4. *P. erinaceus* is a rosewood species native to the semi-arid Sudan-Guinea savanna forests of West Africa, including those of Senegal.¹ The species was listed on CITES Appendix III (the listing took effect on May 9, 2016), Appendix II (the listing took effect on January 2, 2017), and the international trade from Nigeria was suspended (decision took effect on November 8, 2018).^{2,3,4} Despite the Appendix II listing and trade suspension in Nigeria, multiple reports and trade data analyses indicate that the species is still harvested

* The geographical designations employed in this document do not imply the expression of any opinion whatsoever on the part of the CITES Secretariat (or the United Nations Environment Programme) concerning the legal status of any country, territory, or area, or concerning the delimitation of its frontiers or boundaries. The responsibility for the contents of the document rests exclusively with its author.

¹ Hutchinson, J., et al. 1958. Flora of west tropical Africa. Vol. 1, part 2. Crown Agents for Overseas Governments and Administrations, London.

² https://cites.org/sites/default/files/eng/cop/17/prop/SN_Pterocarpus_erinaceus.pdf

³ https://cites.org/sites/default/files/eng/cop/17/CITES_CoP17_DECISIONS.pdf

⁴ <https://cites.org/sites/default/files/notif/E-Notif-2018-084.pdf>

and traded at an unsustainable rate across the region.^{5,6,7} At its 70th meeting (SC70, Sochi, 2018), the Standing Committee of CITES agreed on a recommendation requesting that the Plants Committee consider the inclusion of *P. erinaceus* from all range States in the CITES Review of Significant Trade [RST; Resolution Conf. 12.8 (Rev. CoP18)]. This recommendation was further endorsed by the 18th meeting of the Conference of the Parties to CITES (CoP18, Geneva, 2019), in Decision 18.92. This recommendation drew upon the information in a threat assessment on illegal wildlife trade in West and Central Africa (CoP18 Doc. 34), and directed the Standing Committee to, *inter alia*, “consider any report from the Plants Committee, in response to the recommendation agreed at its 70th meeting, concerning the inclusion of *P. erinaceus* from all range States in the Review of Significant Trade and make recommendations as required.”⁸

5. Although the Appendix II listing of *P. erinaceus* took effect in early 2017, there have been no reported cases where the Non-detriment Findings (NDFs) provisions of Article IV of the Convention appear to have been met for the trade of the species.⁹ The review of Significant Trade at the 25th Meeting of the Plants Committee categorized the following countries as “action is needed”: Benin, Burkina Faso, Gambia, Ghana, Guinea Bissau, Mali, Nigeria, and Sierra Leone. As such, these countries are included in Stage 2 of RST and, due to the urgency of the matter the Plants Committee agreed “to proceed via intersessional decision-making, in accordance with Rule 19 of its Rules of Procedure, once the relevant consultations with range States have taken place and the report to be commissioned by the Secretariat is available.”¹⁰ The full update from the Plants Committee is included in the agenda item on Inclusion of *Pterocarpus erinaceus* in the Review of Significant Trade: Report of the Plants Committee. Notably, the Plants Committee also referred all range states to the Standing Committee based on “documented, widespread and pervasive illegal trade,”¹¹ which is also the subject of this document.

Persisting International Trade in *P. erinaceus*

6. Despite its listing on the Appendix II, trade data indicate that *P. erinaceus* is the most traded rosewood species in the world (Figure 1). Between the Appendix II listing in January 2017 and November 2021 China alone has imported a total of 3.49 million tons of *P. erinaceus* from West Africa, for a total value of US\$1.98 billion.¹² This represents 71 percent of the total quantity of “hongmu” imported by China during that period (Figure 1).¹³

⁵ <https://www.sciencedirect.com/science/article/abs/pii/S000632071930117X>

⁶ http://jaesnet.com/journals/jaes/Vol_9_No_2_December_2020/10.pdf

⁷ <https://science.thewire.in/environment/senegal-rosewood-forests-china-demand/>

⁸ <https://cites.org/sites/default/files/eng/prog/enforcement/E-CoP18-34.pdf>

⁹ <https://cites.org/sites/default/files/eng/com/pc/25/Documents/E-PC25-15-05.pdf>

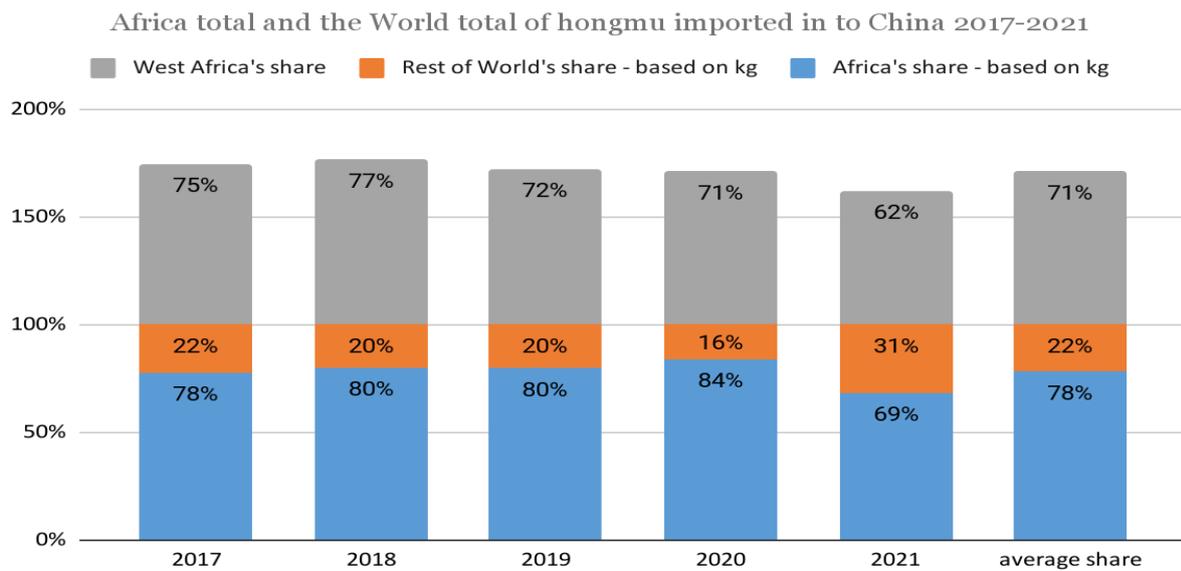
¹⁰ <https://cites.org/sites/default/files/eng/com/pc/25/exsum/E-PC25-ExSum-04-R1.pdf>

¹¹ <https://cites.org/sites/default/files/eng/com/pc/25/exsum/E-PC25-ExSum-04-R1.pdf>

¹² Analysis based on Chinese customs data.

¹³ Meaning “red wood” in Chinese, the term hongmu refers to a range of richly hued, durable tropical hardwoods — ebonies, rosewoods, and palisanders — used to produce high-end reproduction furniture, flooring and handicrafts. Twenty-nine species of Cassia, Dalbergia, Diospyros, Millettia and Pterocarpus genera are identified as hongmu species since the revision of July 2018.

Figure 1. Share of the volume of *P. erinaceus* imported by China, by regional source.

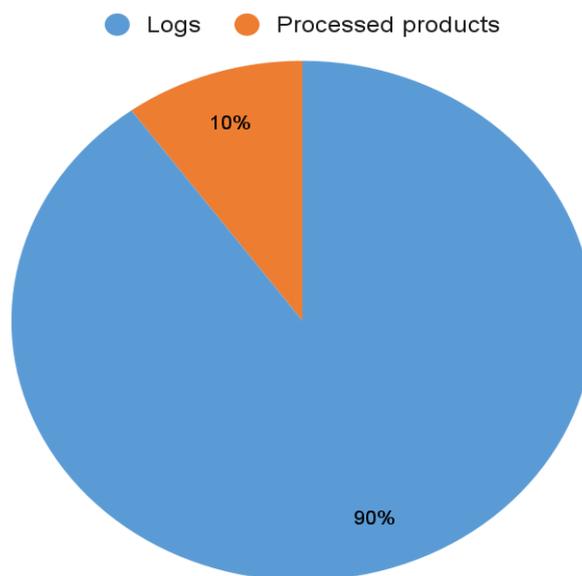


Source: Analysis based on Chinese customs data.

Between January 2017 and November 2021, West Africa has been the main region providing hongmu to China, as measured in kilograms. As presented in Figure 2, 90 percent of *P. erinaceus* traded between West Africa and China has been in the form of logs, from January 2017 to November 2021.

Figure 2. Nature of the *P. erinaceus* imported in China from West Africa, in percentage of total quantity (2015-2021).

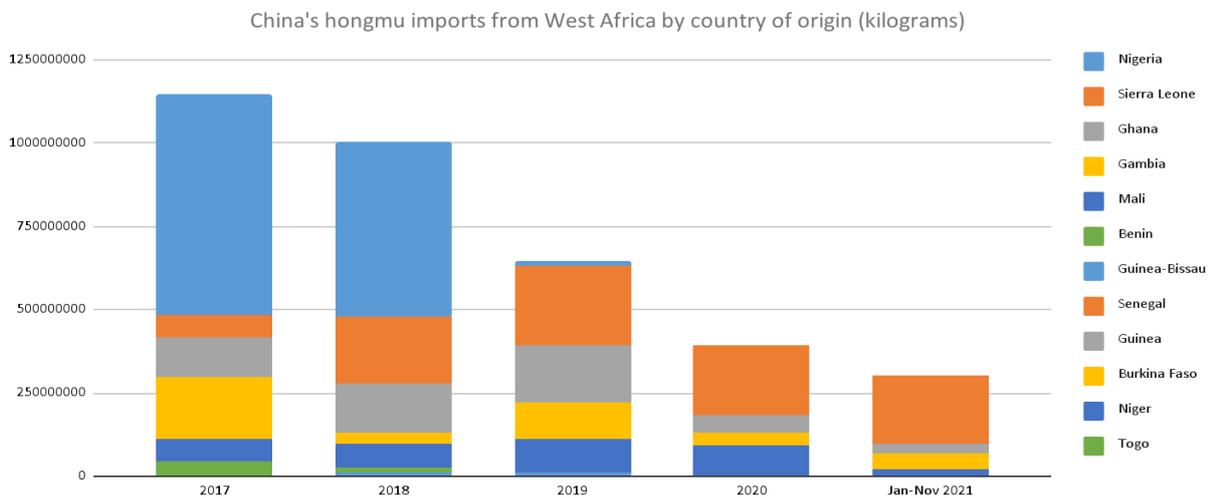
Nature of West Africa hogmu exported to China 2017- Nov2021



Source: Analysis based on Chinese customs data.

7. As shown in Figure 3, the suspension in the trade of *P. erinaceus* from Nigeria appears to be the most significant driver of change in the international trade. Subsequent to the suspension, the quantity of *P. erinaceus* from Nigeria decreased by 97 percent between 2018 and 2019 (in kilograms).¹⁴ However, four other major export countries from West Africa (Sierra Leone, Ghana, The Gambia, and Mali) increased export levels by 35 percent in 2019 when compared to 2018.¹⁵ This substitution effect seems to have been partially attenuated in 2020 and 2021, potentially due to the pandemic and the global economic downturn.

Figure 3. Country of origin of the *P. erinaceus* imported into China, in Kilograms.

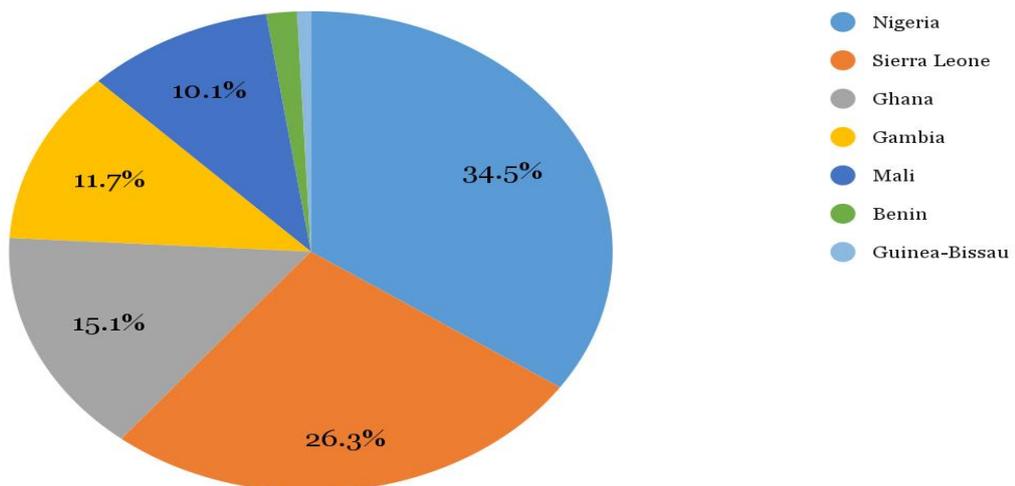


Source: Analysis based on Chinese customs data.

8. As presented in Figure 4, the international trade in *P. erinaceus* has primarily come from five countries since January 2017, namely Nigeria, The Gambia, Ghana, Sierra Leone, and Mali. Altogether they accounted for more than 90 percent of the volume of *P. erinaceus* imported in China from West Africa.

Figure 4. Share of the volume of *P. erinaceus* imported by China, by country of origin (2017-Nov 2021).

Share of *P. erinaceus* imported by China, by country of origin (2017-Nov 2021) . * Senegal, Burkina Faso, etc have insignificant trade/not properly visualized.



Source: Analysis based on Chinese customs data.

¹⁴ Analysis based on Chinese customs data.

¹⁵ Ibid.

9. Between January 2017 and November 2021 China alone has imported on average 63,000 tons per month of *P. erinaceus* from West Africa, which is equivalent to approximately 2,723 20-foot containers per month.^{16,17} This represents harvesting levels of approximately 109,571 *P. erinaceus* trees per month on average in West Africa between January 2017 and December 2021.¹⁸ Given the adaptability demonstrated by the commercial network and the recurrent regional smuggling and misdeclaration schemes developed by traffickers, as reported by the United Nations Office on Drugs and Crime (UNODC), and also taking into account the fairness of the process, the Government of Senegal considers that a temporary trade suspension of *P. erinaceus* from all the range States should be considered by the Standing Committee.^{19,20}
10. Despite the pandemic and the international economic crisis, which has slowed down and, in many instances, even stopped major global timber trade flows, the trade in *P. erinaceus* has persisted and has even grown in recent months. Since the release of the report from UNEP/WCMC, international trade in *P. erinaceus* has continued (Table 1).

Table 1. Evolution of the trade in *P. erinaceus* between West African countries and China.

Country of origin	Quantity traded between June 2020 and November 2021 (in tons)	Value traded between June 2020 and November 2021 (in US\$)	Change in trade between June 2019-February 2020 and June 2020-February 2021 (in percentage)	Approximate number of trees logged for export between June 2020 and November 2021
The Gambia	73,043	37,212,003	-51%	127,031
Ghana	70,521	37,737,504	-50%	122,645
Mali	98,111	66,267,702	55%	170,628
Nigeria	494	576,432	-52%	861
Sierra Leone	347,869	217,668,487	17%	604,989

Source: Analysis based on Chinese customs data.

Information on Illegal Trade

11. In order to protect the fragile populations of *P. erinaceus*, most West African countries have adopted and implemented regulatory measures (Annex) at an early stage. These measures include, *inter alia*, bans on harvesting, transport, and/or export, or strict control of these different stages. As presented in the previous section, it appears that these national measures have often failed to keep the international trade in *P. erinaceus* under control. There is wide evidence to suggest that the illegal trade has circumvented these controls in most West African countries, specifically, in Sierra Leone, Ghana, The Gambia, and Mali, which are the current principal exporters of *P. erinaceus* to China.²¹ The “boom and bust” cycle of overexploitation of *P. erinaceus* to the point of commercial extinction in country after country in West Africa, often in violation of domestic laws limiting or banning harvest and export, indicate that consistent policies applicable to the entire region are needed.

¹⁶ Analysis based on Chinese customs data.

¹⁷ Conservative numbers were used to convert tons of *P. erinaceus* into approximate number of containers and approximate equivalent in logged trees. For this document there an estimate of 23 tons of *P. erinaceus* logs per 20-foot container was used, which represents a total of 80 logs per container. For this document it was estimated that each *P. erinaceus* tree yields on average two logs (2.20 meters length log).

¹⁸ Analysis based on Chinese customs data.

¹⁹ https://www.unodc.org/documents/data-and-analysis/wildlife/World_Wildlife_Crime_Report_2016_final.pdf

²⁰ https://www.unodc.org/documents/data-and-analysis/wildlife/2020/World_Wildlife_Report_2020_9July.pdf

²¹ https://www.unodc.org/documents/data-and-analysis/wildlife/2020/WWLC20_Chapter_2_Rosewood.pdf

12. Since the CITES Appendix II listing in 2017, Sierra Leone tripled its exports of *P. erinaceus* between 2017 and 2018.²² Concerned about the damage caused by the indiscriminate felling of trees driven by international trade, the government of President Julius Maada Bio issued the Executive Order No1 in April 2018, declaring that, "the export of timber logs is suspended with immediate effect" in the country.²³ The log export ban was temporarily lifted, starting in May 2018, for wood already cut.²⁴ This appears to have opened the door to laundering operations, through which *P. erinaceus* logs coming from illegal logging operations including some established in Sierra Leone's Outamba-Kilimi national park, are exported to Asia.²⁵
13. Ghana has established a series of consecutive bans focused on harvest, transport and/or export of *P. erinaceus* for close to 10 years.²⁶ A ban was established in April 2019 which prohibits the harvest, processing, and export of rosewood.²⁷ Despite these restrictions, the country has been one of the largest exporters of *P. erinceus* to China (see Figure 4). This has mainly been explained by widespread illegal harvesting, transport, and export under the guise of "salvage permits", which should only be granted for road and dam construction projects.²⁸ Structural issues and alleged fraud in the granting of these permits and related CITES export permits have been frequently reported in 2019 and 2020.^{29,30,31} In August 2019, the Ghanaian government established a Committee to Investigate Allegation of Corruption in Rosewood Trade in Ghana.^{32,33} In its public report the Committee acknowledged the challenge of combating active trafficking networks and recognized "institutional weaknesses and lapses in the rosewood trade."³⁴ In spite of the 2019 export ban, rosewood exports continued in 2019, 2020, and 2021 and a new directive was issued in July 2021 prohibiting the export of any rosewood (including seized and auctioned) and directing the Forestry Commission to cease the issuance of CITES permits while the ban is in effect.³⁵
14. The continuous smuggling of rosewood from Senegal to The Gambia and its illegal re-export to China in breach of laws of The Gambia that suspended the export of *P. erinaceus* has been reported on multiple occasions in 2020.^{36,37} Despite the fact that *P. erinaceus* was declared nearly extinct by the Forest Administration in The Gambia in 2012, the country has been one of the largest exporters of the species to China (see Figure 4). According to a recent report, the illegal rosewood trade between Senegal, The Gambia, and China is a primary source of income for the rebel group Movement of Democratic Forces of Casamance.³⁸ An estimated 1.6 million *P. erinaceus* trees have been illegally harvested in Senegal and smuggled into The Gambia between June 2012 and April 2020.³⁹
15. The export of all raw timber has been prohibited in Mali since 1994 and nevertheless the country has become a growing exporter of *P. erinaceus* in recent years (see Figure 3). Companies reportedly exploit legal loopholes regarding the precise definition of "transformed wood" in Mali by declaring square logs as exportable goods.⁴⁰

²² Ibid.

²³ <http://www.sewa.news/2018/07/sierra-leones-unregulated-export-timber.html>

²⁴ <https://www.reuters.com/article/us-health-coronavirus-leone-logging/coronavirus-comes-to-rescue-of-sierra-leones-plundered-rosewood-idUSKBN211B0>

²⁵ https://www.youtube.com/watch?v=19_IQPhyiYE

²⁶ <https://www.sciencedirect.com/science/article/abs/pii/S000632071930117X>

²⁷ <https://www.globalwoodmarketsinfo.com/ghana-rosewood-harvesting-transport-export-banned/>

²⁸ <https://www.sciencedirect.com/science/article/abs/pii/S000632071930117X>

²⁹ <https://www.kasaghana.org/news/the-rosewood-plunder-scandal-how-did-we-get-here>

³⁰ <https://www.ghanaweb.com/GhanaHomePage/NewsArchive/Government-blamed-for-continued-illegal-logging-of-rosewood-1033432>

³¹ <https://www.myjoyonline.com/forestry-commission-permits-private-companies-to-salvage-rosewood-ballet-despite-ban/>

³² <https://allafrica.com/stories/201908280527.html>

³³ <https://newsghana.com.gh/rosewood-committee-presents-report-to-lands-minister/>

³⁴ <https://citinewsroom.com/2020/02/no-evidence-of-corruption-against-govt-officials-rosewood-cttee-report/>

³⁵ <https://www.myjoyonline.com/lands-ministry-outright-ban-on-export-of-rosewood/>

³⁶ <https://www.bbc.co.uk/programmes/m000qr2j>

³⁷ <https://news.mongabay.com/2020/11/chinese-demand-and-domestic-instability-are-wiping-out-senegals-last-forests/>

³⁸ <https://eia-global.org/reports/20200603-cashing-in-on-chaos>

³⁹ Ibid.

⁴⁰ <https://uk.news.yahoo.com/legal-loopholes-allow-endangered-rosewood-162506884.html>

16. Much of the current international trade in *P. erinaceus* is occurring in breach of CITES requirements related to the legal acquisition findings requirements of Article IV of the Convention and national laws. Information emerging from range states indicates that a significant amount of the trade is illegal.

Recommendations

17. The Government of Senegal recommends that in this exceptional case, and based on the Decision 18.92 directing the Standing Committee to “a) consider the report from the Secretariat in accordance with Decision 18.93, paragraph d) and progress made by Parties in West Africa in strengthening CITES implementation and make further recommendations as appropriate,” the Standing Committee, at its 74th Meeting develop recommendations to limit ongoing and pervasive illegal trade in *P. erinaceus*.
18. The Standing Committee is invited to consider creation of an in session Working Group on *P. erinaceus*, to develop further recommendations as directed by Decision 18.92 and in response to the referral from the Plants Committee related to illegal trade in *P. erinaceus*,. Considerations for the Working Group may include:
- a) review of the information related to *P. erinaceus* contained in this document and Wildlife crime enforcement support in West Africa: Report of the Secretariat;
 - b) whether the Standing Committee should consider a recommendation for Parties not to accept exports or re-exports for commercial purposes from range states of specimens of *P. erinaceus* to halt ongoing and shifting illegal trade, and to lay the groundwork for future legal trade in *P. erinaceus* in compliance with the Convention; and
 - c) which, if any, of the Decisions 18.88 - 18.93, Wildlife crime enforcement support in West Africa, should be modified, expanded or submitted in their current form as draft Decisions for consideration by the 19th Conference of the Parties.

Regulations related to harvest and export of *P. erinaceus* in West Africa

This table is an updated version of a previous document prepared by Senegal, PC22 Inf. 13, Table 1.

Countries	Special measures for the protection or management of the species	Export-related regulation
Benin	According to the Forest Code in force (Law No 93-009 of 2 July 1993 laying down forest regime in the Republic of Benin) and its implementing decree (Decree No 96-271 of 2 July 1996, Article 25), <i>P. erinaceus</i> is a protected species belonging to the "List of protected forest species" (<i>P. erinaceus</i> appears under its common name "Vene").	"Decree No 2005-708 of 12 November 2005 on procedures for the exploitation, transportation, trade, industry and control of forest products in the Republic of Benin." In Article 21, the export of all woody species in their raw form is prohibited in Benin. This provision has been taken up in Article 3 of the "Interministerial Decree-Year2007-0053/MEPN/MIC/DC/SGM/DGFRN/SEB on procedures for the exploitation, transportation, trade, industry and control of forest products in the Republic of Benin"
Burkina Faso	<i>P. erinaceus</i> is specifically protected by Order No 2004-019/MECV of 7 July 2004, establishing the list of forest species which benefit from special protection measures. The Order is related to the implementation of the Forest Code adopted in 1997 (Law No. 006/97/ADP on the Forest Code in Burkina Faso). The implementing decree related to the protection of species within the framework of the 2011 Forest Code (Law No 003-2011/AN on the Forest Code in Burkina Faso) has not yet been published. The Forest Code states in its Article 44 that "Some forest species, due to their specific ethnobotany interest or risk of extinction threatening them, benefit from special protection measures. The list is established by the order of the Minister of Forests."	Export of logs and processed products is prohibited under Decree No 2005 - 003/MECV/MCPEA of 9 March 2005 which suspends all operations and the trade of timber at the national level. The decree is still in force today. The text of the law bans the commercialization of "bois d'oeuvre," generally translated as timber or lumber, which is believed to include logs and sawnwood, at a minimum.
Chad		CEMAC (Economic and Monetary Community of Central Africa) Members, have committed to banning all log exports in 2023. https://www.atibt.org/en/news/13044/log-export-ban-cemac-postpones-entry-into-force-to-2023

Countries	Special measures for the protection or management of the species	Export-related regulation
Côte d'Ivoire	<i>P. erinaceus</i> species cannot be exploited pursuant to Decree No. 2013-508 of 25 July 2013 relating to "banning of exploitation, harvesting, transportation, trade and export of Vene timber".	<i>P. erinaceus</i> species cannot be exported pursuant to Decree No. 2013-508 of 25 July 2013 relating to "banning of exploitation, harvesting, transportation, trade and export of Vene timber". Article 95 of the Forest Code passed in 2014 and applicable as of 2016, states that timber products of any species destined for export must be transformed (i.e. processed) before exportation, unless the exporting company receives a special license from the government.
Ghana	A ban was placed on the harvesting and export of rosewood timber in July 2014.	A ban was placed on the harvesting and export of rosewood timber in July 2014. This ban was reportedly lifted, but the suspension may have applied only to specific companies. A new ban reportedly came into force in March 2019. This new ban seemingly had no company-based exceptions and was made permanent by the Minister of Lands and Natural Resources in February 2020. https://www.pulse.com.gh/bi/strategy/ghanaian-government-extends-ban-on-rosewood-export-indefinitely/14tprc In spite of the 2019 export ban, rosewood exports continued in 2019, 2020, and 2021 and a new directive was issued in July 2021 prohibiting the export of any rosewood (including seized and auctioned) and directing the Forestry Commission to cease the issuance of CITES permits while the ban is in effect. https://www.myjoyonline.com/lands-ministry-outright-ban-on-export-of-rosewood/
Guinea		In November 2006, Guinea banned the export of teak logs and sawnwood. It is unclear if this ban is still in force. CITES Notification to the Parties No. 2013/017 of 16 May 2013, the Secretariat published a recommendation of the Standing Committee to suspend commercial trade in specimens of CITES-listed species with Guinea. The only exception to this suspension for <i>Pterocarpus erinaceus</i> was a one-time May 2021 approval of the export of up to 14,000 m ³ of pre-Convention stockpile. CITES Notification to the Parties No. 2021/037.

Countries	Special measures for the protection or management of the species	Export-related regulation
Guinea-Bissau	In April 2015, the government issued a moratorium on all timber felling and export for five years.	In April 2015, the government issued a moratorium on all timber felling and export for five years. Although the ban expired in March 2020, an act of the government may be required to lift the moratorium. In 2020 the government drafted a decree to lift the ban, which was awaiting the President's signature in 2021. Exports of specimens harvested after the entry into force of the listing of <i>P. erinaceus</i> in Appendix II (2 January 2017) were prohibited under national legislation for the years 2017, 2018 and 2019. Zero export quota under CITES for 2018 and 2019, except for 24,339 m ³ of pre-Convention specimens for export in 2018. CITES Notification to the Parties 2018/051.
Mali	<i>P. erinaceus</i> is on the list of protected species mentioned in the Forest Code (Law No. 95-004 laying down conditions of forest resources management, Article 17). According to Article 16: "Protected species are those which benefit from social protection due to their economic, socio-cultural or scientific interest. Their felling and uprooting are prohibited unless expressly authorized." Express authorizations are issued by the Director of Forest Service.	Decree No. 00-505/P-RM of 16 October 2000 on foreign trade regulations specifies the prohibited products for export such as unprocessed wood. The Inter-ministerial interdiction No 2014 -1856 / MC-MEF-SG-MEEA of 10 July 2014 relating to the interdiction of the export of timber, service wood (construction wood), firewood, bamboo, raphias of a raw state and charcoal, bans all export of timber.
Nigeria	In Nigeria, forestry laws are under the remit of states. Thus, <i>P. erinaceus</i> is a protected species in Taraba State, and given this status, felling and export status are strictly prohibited. In Cross River State, logging is prohibited in all natural forests and for all woody species.	Nigerian customs website lists a ban on export of timber (rough or sawn). CITES Standing Committee's recommendation to suspend commercial trade in specimens of <i>Pterocarpus erinaceus</i> from Nigeria began in November 2018 and remains in effect. CITES Notification to the Parties No. 2018/084. Zero export quotas for 2020 and 2021.
Senegal	<i>P. erinaceus</i> species is protected by the current legislation namely the Forest Code (Law No 98-03 of 8 January 1998) and Decree No 98-164 of 20 February 1998, Article 63. This policy was reaffirmed in 2019, with the list of species remaining constant between the 1998 and 2019 iterations (http://extwprlegs1.fao.org/docs/pdf/Sen191602.pdf , Article 51).	<i>P. erinaceus</i> export is strictly prohibited pursuant to the current legislation namely the Forest Code (Law No 98-03 Act of 8 January 1998) and Decree No 98-164 of 20 February 1998, Article 63.
Sierra Leone		Sierra Leone has passed log export bans in the past, but they have generally been short in duration. A new ban was put in place in April 2018, but lifted in May 2018 to allow for export of wood already harvested.

Countries	Special measures for the protection or management of the species	Export-related regulation
Togo	<p>The forest code in force since 2008 (Law No 2008-09 on the Forest Code) identifies species fully protected as "species subtracted from any sampling, except for scientific reasons." No implementing decree for plant species has been adopted to date.</p>	<p>Article 54 of the Forest Code states "[i]mport, export and re-export of timber and non-timber forest products are regulated by decree in the Council of Ministers." The applicable decree is Decree No. 2011-142/PR which regulates import, export, re-export and transit of timber forest products. It establishes, in its Article 8, that authorized operators must obtain a written authorization issued by the administration in charge of forest resources for the import, export or re-export of all forest products. Article 15 of the same Decree also specifies that only forest products resulting from sustainable forest management, as defined in Togo, and which abide by traceability rules as defined by the decree of the Ministry in charge of forest resources, may be exported.</p>