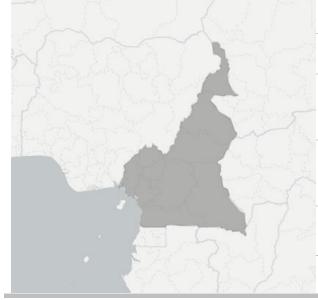




CAMEROON

COUNTRY OVERVIEW TO AID IMPLEMENTATION OF THE EUTR



LAND AREA:	47.56 million hectares ¹		
FORESTED AREA:	22 million hectares ¹ 46% of total land area		
FOREST TYPE:	Permanent forest estate 11.78 million hectares, Non- permanent forest estate 10.22 million hectares ¹		
LAND OWNERSHIP:	94% government administered ² 6% designated for local communities ²		
PROTECTED AREAS:	9.95 million hectares ¹ 48% of forests found in protected areas ³		
VPA STATUS:	VPA entered into force in December 2011 ⁴		

ECONOMIC VALUE OF FOREST SECTOR:

USD 695.3 million in 2011⁵ 2.8% of the GDP in 2011⁵, 2.07% of GDP in 2017⁶ 38th highest exporter of EUTR products globally in 2017 by weight (kg)⁷ 58th highest exporter of EUTR products globally in 2017 by value (USD)⁷

TREE COVER CHANGE:

121 thousand hectares of tree cover loss in 2018⁸ (Average of 137.2 thousand hectares per year 2014– 2018⁸) [noting that 'tree cover' may be natural forests or plantations and that 'loss' can be due to a variety of factors]. 65.1 thousand hectares of tree cover gain 2001– 2012⁸.

CERTIFIED FORESTS:

FSC certification: 341 708 hectares (2019)⁹ PEFC certification: none (2019)¹⁰ OLB certification: 2 030 214 hectares (2017)¹

CHAIN OF CUSTODY CERTIFICATION:

FSC certification: 6 CoC certificates (2019)⁹ PEFC certification: none (2019)¹⁰ Other CoC certification: 2 BV-CW, 2 SGC-CW and 2 SW-CW certificates (2017)¹

MAIN TIMBER SPECIES IN TRADE:

Okan (Cylicodiscus gabonensis), movingui (Distemonanthus benthamianus), kossipo (Entandrophragma candollei), sapelli (E. cylindricum), tali (Erythrophleum ivorense and E. suaveolens), azobé (Lophira alata), iroko (Milicia excelsa), dabéma (Piptadeniastrum africanum), ayous (Triplochiton scleroxylon)^{11,12}.

CITES-LISTED TIMBER SPECIES:

21 species:, Dalbergia afzeliana, D. boehmii, D. dalzielii, D. ealaensis, D. ecastaphyllum, D. hostilis, D. lactea, D. louisii,
 D. melanoxylon, D. oligophylla, D. pachycarpa, D. rufa, D. saxatilis, D. sissoo, Diospyros ferrea, Guibourtia demeusei,
 G. pellegriniana, G. tessmannii, Pericopsis elata, Prunus africana and Pterocarpus erinaceus (all Appendix II)¹³

RANKINGS IN GLOBAL FREEDOM AND STABILITY INDICES:

Rule of law index¹⁴ 4th quarter 124/128 in 2020 (score: 0.36/1) Corruption perception index¹⁵ 4th quarter 153/180 in 2019 (score: 25/100)

Fragile states index¹⁶ 4th quarter score: 97 in 2020 (rank: 158/172)

Freedom in the world¹⁷ 4th quarter 171/195 in 2020 (score: 18/100)

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LEGAL TRADE FLOWS

In 2017, exports of EUTR-regulated products (timber and timber products to which the EUTR applies) from Cameroon totalled USD 516 million, of which 36% was exported to the EU-28, according to data from the UN Comtrade Database⁷. Cameroon exported EUTR products to 81 different countries and territories. The main global markets for Cameroon's EUTR products in 2017 by value were China and Viet Nam (Figure 1 a). The main EUTR products exported from Cameron by HS code according to value in 2017 were sawn wood (HS 4407) and rough wood (HS 4403) (Figure 1 b).

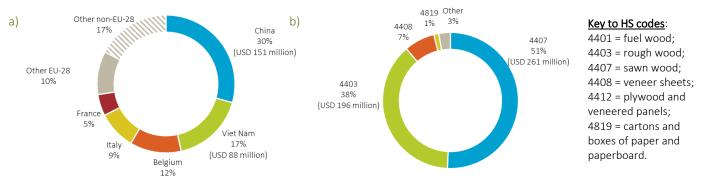
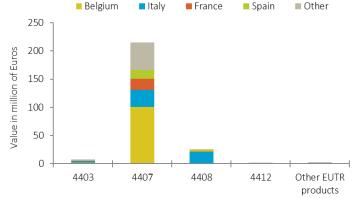
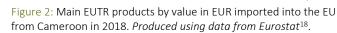


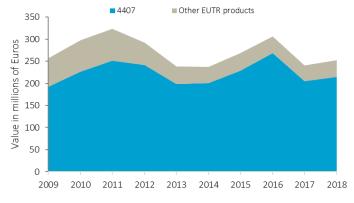
Figure 1: a) Main global markets for EUTR products from Cameroon in 2017 in USD; b) Main EUTR products exported from Cameroon in 2017 by HS code according to value in USD. *Produced using data from the UN Comtrade Database*⁷.

The EU imported 252 million Euros of EUTR-regulated products from Cameroon in 2018, according to data from the Eurostat Comext database¹⁸. The **main EUTR product imported into the EU from Cameroon in 2018** by value (Figure 2) and weight (Figure 4) was sawn wood (HS 4407), followed by veneer sheets (HS 4408). The main importers of EUTR products in 2018 were (in order of most imports) Belgium, Italy, France and Spain by value and Belgium, Italy, France and Ireland by weight.

Over the ten year period 2009–2018, the **total value of EU imports of EUTR-regulated products from Cameroon** has fluctuated (Figure 3), with sawn wood (HS 4407) making up the majority of EU imports by product.









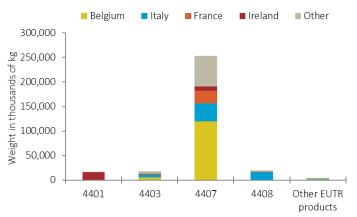


Figure 4: Main EUTR products by weight imported into the EU from Cameroon in 2018. *Produced using data from Eurostat*¹⁸.

The production and trade flows of wood products in 2015 (Table 1) show that Cameroon produced more wood products than were consumed.

	Production (x 1000 m³)	Imports (x 1000 m³)	Domestic consumption (x 1000 m³) Calculated from reported data	Exports (x 1000 m³)
Logs (Ind. Roundwood)	3210	0	2058	1152
Sawn wood	1022	0	360	662
Veneer	29	0	1	28
Plywood	18	1	12	7

Table 1: Production and trade flows of wood products in Cameroon in 2015 (based on ITTO 2017 data)¹⁹.

KEY RISKS FOR ILLEGALITY

COMPLIANCE WITH LEGISLATION:

Corruption is considered to be an issue within the forestry sector^{20,21,22}, which is hindering progress in the implementation of a timber legality verification system²³. Weak application of the law and impunity (lack of sanctions or accountability of State officials) are considered among the main causes of the persistence of corruption in the forestry sector²².

ILLEGAL HARVESTING OF SPECIFIC TREE SPECIES:

Azobé (Lophira alata), sapeli (Entandrophragma cyindricum), doussié (Afzelia spp.), moabi (Baillonella toxisperma), wengé (Millettia laurentii), tali (Erythrophleum ivorense, E. suaveolens), iroko (Milicia excels, M. regia)²⁴and bubinga (Guibourtia tesmanii)^{25,26}.

RESTRICTIONS ON TIMBER TRADE:

Logs of 23 species prohibited from export from Cameroon, as listed in Annex I-B of the Cameroon VPA²⁸. 20% tax on exports of logs since 2017²⁹. No relevant EU³⁰ or UN sanctions³¹ on timber exports or imports.

PREVALENCE OF ILLEGAL HARVESTING OF TIMBER:

Estimated at 33% of overall log production in 2013²⁷ and 65% of total timber production in 2015²⁰.

COMPLEXITY OF THE SUPPLY CHAIN:

Cameroon is a transit country for timber from the Central African Republic and the Republic of Congo, which may be reported as originating in Cameroon²⁷.

Illegal harvest and trade

Estimates of illegal logging in Cameroon vary from 33% of overall log production, based on a survey of forestry sector experts in Cameroon in 2013²⁷, to 65% of total timber production, based on an estimate by think-tank Chatham House in 2015²⁰. A 2010 study identified "corruption, poverty, conflicts, issues with licencing schemes, usurpation of property rights, and inadequate institutional support" as the main drivers of illegal logging in Cameroon, based on interviews with stakeholders³². Issues with illegality have also been identified in the production chain, including unregulated sawmills operating for the domestic market³³.

In a 2017 risk assessment of timber legality in Cameroon, NEPCon identified a number of specified risks including: areas with overlapping land classifications resulting in conflicting legal use of the land; forest management plans often prepared based on limited or low quality data, then poorly implemented or not complied with (particularly by smaller operators); possible corruption in the application process for annual cutting area or harvesting without a permit; risk of falsifying tax declarations and inadequate monitoring and enforcement of payment of taxes; illegal harvesting of timber from reserves; lack of an approved environmental impact assessment in small forest titles; and overharvesting³⁴.

In 2018, issues reported to be regularly observed in independent external observation (OIE) missions of members of the OIE Coordination Cameroon included: unauthorised logging; exploitation of prohibited species (e.g. Bubinga); no delineation of the annual allowable cut; unmarked stumps and logs; overlapping boundaries between cut sales and community forests; and creation and extensions of community fields and agroindustrial plantations²⁶.

The forestry sector has been noted to suffer from corruption in Cameroon^{20,21,22}, with a National Strategy for the Fight Against Corruption implemented since 2011^{35, 36}. A 2011 report by the Cameroon National Anti-Corruption Commission (Commission Nationale Anti-Corruption, CONAC) noted that checks on the Ministry of Forests and Wildlife (MINFOF) in 2008 found MINFOF agents allegedly involved in illegal activities²¹. Five years later, CONAC's reports repeat similar findings: illegal logging is prevalent, together with large scale corruption³⁵. During a mission on the construction site of a Lycée Technique in Yabassi (Nkam region) in 2016, following a denunciation reporting illegal logging against a background of corruption by a the Chinese company in charge with building the school, investigators found the denunciation to be well-founded, including illegal exploitation of timber and complicity of several high-level officials, including the Delegate of Forests and Fauna of the Nkam departement³⁵. In 2017, CONAC reported on a successful reduction (by 82% over 100 days) of the extent of illegal and informal practices in 37 communal forests and 23 legal entities, due to efforts of MINFOF³⁶. However, the report also highlighted a general lack of transparency and laxity from MINFOF officials when dealing with cases of illegal logging³⁶.

In line with the various CONAC reports published from 2011 to 2017, MINFOF's own investigation (in 2012) into corruption practices in the forestry and wildlife sector confirmed that there was complicity between MINFOF agents and economic operators involved in corrupt practices, following which they developed an anti-corruption action plan, in alignment with the National Strategy to Fight Corruption (SNLCC)^{21,35–39}. Interviews with a range of forestry professionals 2008-2011 indicated collection of "informal payments" was also common⁴⁰. Misappropriation of forestry related taxes during the period 2000-2004 were also highlighted in a 2012 World Bank report⁴¹; fraud in public auctions for seized timber products has also been noted, related to ineffective monitoring²⁷. Citizen's ability to hold forest authorities accountable or to fully participate in forest management was reported to be hindered by a decentralised system and lack of information³⁴. Prevention and educational campaigns, through television and radio broadcasts for instance, have significantly contributed to raising awareness on forest legislation and alerting the public to the widespread occurrence of corruption in the timber industry³⁶. However, sanctioning unlawful behaviours was reported to remain a challenge³⁶. Although Cameroon's new Penal Code (2016) has incorporated provisions found in the United Nations Convention against Corruption, very little was reported to have been done in practice to punish those involved in illegal logging³⁶.

Since 2012, an assessment of the Corruption Perceptions Index (ACPI) has been regularly conducted in the forest and wildlife sector, to assess stakeholder perceptions of the effectiveness of anti-corruption initiatives under the National Anti-Corruption Strategy (NACS) and initiatives to promote good governance (e.g. FLEGT VPA and REDD+)²². A 2013 survey of experts on illegal logging issues in Cameroon indicated that perceptions of the effectiveness of the Cameroonian government's response to illegal logging had improved since a 2010 poll²⁷ (although the authors note that a higher proportion of government representatives in the 2013 survey may be a factor). The 2017 ACPI carried out by Forêts et Développement Rural (FODER) indicated an increase in corruption perceptions between 2014 and 2017, despite activities to promote good governance, with >50% of stakeholders surveyed in 2017 giving high corruption perception scores of 8/10 - 10/10, indicating that anti-corruption initiative may be inadequate and ineffective²². The assessment describes a "progressive normalisation of illegality in the forest and wildlife sector", with many stakeholders carrying out forest exploitation activities doing so without the required official authorizations or documents, a situation fostered by corruption of actors further up the supply chain. Stakeholders were also reported to carry out activities prohibited by forest rules and regulations, such as not respecting the prohibition on exploiting poles in the national estate (Circular No. 0059/C/MINFOF/CAB of 21 April 2016)²².

Reports have identified alleged corruption in the allocation of "small title" logging permits, e.g. salvage licences (Autorisation de Récupération des Bois, or ARB) and harvested timber removal licences (Autorisation d'Enlèvement des Bois abattus, or AEB)^{24,42}. Furthermore, the implementation of forest and related resource allocation procedures was considered to have worsened between 2010 and 2015 according to one study²⁷, which also reported that the oversight process in place for allocation of concession and "Vente de coupe" (cut timber sale) permits was not in place for the allocation of "small title" permits²⁷. Lack of transparency around logging permits has also been reported as an issue; for example, lack of publicly accessible maps for areas of operation for some "Vente de coupe" permits⁴³.

By Decision No. 0842 of 12 April 2012, MINFOF cancelled the Authorizations for Recovery and Removal of Timber (ARB and AEB)¹. This decision followed conclusions of field missions carried out in February and March 2012 by the National

Forest Control Brigade and the Independent Observer. Since then, MINFOF has granted almost no AEB and ARB, generally a source of fraud, since most were reportedly obtained under the guise of agricultural or development projects¹.

Investigations into a Cameroonian timber export company, Compagnie de Commerce et de Transport (CCT), indicated that a number of logging companies which supplied CCT were allegedly involved in the laundering of illegally harvested wood^{43,44}. Many suppliers were logging with "Vente de coupe" permits [see Forestry management section], which are associated with destructive logging practices as well as the laundering of timber logged outside the boundaries of the legal logging titles^{43,44}. Subsequent to concerns regarding the risk of illegal timber entering CCT's supply chain, a Dutch importer of CCT timber was taken to court and, in 2017, was found to be in breach of its due diligence obligations under EUTR⁴⁵. The Ministry of Forestry and Wildlife issued responses to the 2015 study⁴⁶ and to a 2017 allegation of logging in the Dja Wildlife Reserve⁴⁷, refuting the allegations made by the NGO Greenpeace.

Investigations carried out by civil society organisations during independent external observation missions in 2018 uncovered alleged illegal logging in the national forest domain and state forests carried out by three different companies operating in the Sanaga Maritime (South), Upper Nyong and Upper Nyong, East⁴⁸. Investigations into a palm oil concession in southwest Cameroon have also alleged that initial allocation of the concession may have been illegal⁴⁹, as were subsequent exports of timber to China, logged during forest clearance⁵⁰. In November 2019, two forestry companies (Société Bois Africains du Cameroun, SBAC and Société Forestière de Bouraka, SFB) were suspended by the Ministry of Forests and Wildlife (MINFOF) for logging beyond concession limits and failure to comply with technical standards⁵¹.

In Cameroon, most of the timber consumed locally comes from informal sources^{33,52}. Whilst policies for sustainable forest management in Cameroon have largely focussed on commercial logging operations, largely operating in concessions, there has been a growth over the last 15 years in informal, small-scale/artisanal logging and processing⁵³. This has taken two different forms, i) community forests, which allow village associations to legally harvest, process and trade timber (turnover <EUR 2 million per year) and ii) individuals chainsaw milling, which operates outside the legal framework and has become an important economic activity in rural and urban areas (representing an annual turnover of EUR 93 million, with an annual production of ~715 000 m³)⁵³.

Despite corruption in the forest sector, forestry companies that have committed to sustainable forest management through forest certification processes tend to better enforce the law⁵⁴. Furthermore, certified Forest Management Units in the Congo Basin have been found to have additional positive social impacts (when compared with non-certified FMUs), such as better working and living conditions and the existence of benefit-sharing mechanisms⁵⁴. The recent withdrawal of several European forestry companies from the Congo Basin (such as the sale by Dutch firm Wijma of several forest concessions in Cameroon) is associated with a decline in FSC certification, as Asian successors are not necessarily maintaining certifications⁵⁵. Wijma ceased timber operations in the South-West Region of Cameroon in 2018, citing financial and operational difficulties⁵⁶ – the company faced criticism for unethical practices due to continuing to log in a zone of armed conflict^{57,58}.

Forestry management and legislation

Cameroon's Forestry Law of 1994 lays down Forestry, Wildlife and Fisheries regulations, including dividing the forest area into two main groups: i) the permanent forest domain (State forests – including areas protected for wildlife and various types of forest reserve, and Council forests) and ii) non-permanent forest estate (communal forests, community forests and forests belonging to private individuals)⁵⁹. Any activities within State or Council forests must be carried out in accordance with a management plan; where the State forest is divided into Forest Management Units, each FMU must have a management plan⁵⁹. In 2017, there were reported to be 115 FMUs (Unité forestière d'aménagement or UFA in French), covering an area of 6.829 million ha¹. Community and private forests require simple management plans⁵⁹. In communal forests, "Vente de coupe" permits do not require a management plan - these cover authorisation to exploit an area not exceeding 2500 ha, with sales of standing volume granted for a non-renewable period of three years⁵⁹.

Gaps in coordination between the laws on forests, mining and land use have encouraged the development of legislation and policies²⁷, in particular Law n⁰ 2011 of 6 May 2011 of Guidance for Planning and the Sustainable Development of the Territory of Cameroon, and the subsequent processes for drawing up the National Scheme and the regional spatial

planning schemes for the territory. A reform of the Forestry Law and other aspects of the legal framework is stipulated as a required supporting measure of the FLEGT Voluntary Partnership Agreement (VPA) with Cameroon^{28,60,61} (which entered into force in 2011); the reforms are reported to still be ongoing^{27,62}. Whilst the inclusion of the domestic timber market in Cameroon's VPA requires a long-term legalisation process for timber sold on the domestic market, there are numerous obstacles to meeting the domestic demand for sawn wood with timber of legal origin⁵², and socio-economic implications of bringing informal logging within the legal framework^{52,63}.

Article 9 of the VPA states that Cameroon "shall establish a system for verifying that timber and derived products have been produced or acquired legally", with the components of the "timber legality verification system" (TLAS) set out in an annex of the VPA²⁸. Part of this process involves development of a web-based information management and traceability system, SIGIF II (Système Informatisé de Gestion des Informations Forestières deuxième génération), to assist with, *inter alia*, verifying the chain of custody of timber^{28,64}. Full implementation of the system was reported to have been hampered by issues including poor internet and electricity supply in some areas, corruption and lack of resources²³. Whilst development of SIGIF II was noted to have been more difficult than expected, MINFOF approved the provisional version of the software in 2017⁶⁵ [currently work on SIGIF II has halted, with no functional system available]. The lack of significant progress in developing a timber traceability system is considered one of the major issues in the FLEGT VPA process⁶⁶ and is cited as an indicator of the ineffectiveness of the FLEGT Action Plan⁶⁷.

The current legality grids set out in the VPA have proved difficult to implement, due to the 'inoperative' nature of some of the verifiers⁶⁷. Legality grids have proved to be inapplicable at the forest concession level, as most forest concessions cannot provide the complete set of documents requested. A process of revision of the VPA legality grids is currently underway.

Under Cameroonian law, operators require a 'certificate of legality' (issued by MINFOF) to show that they conduct their activities in accordance with national law²⁸ [certificates of legality are one of the requirements needed for FLEGT licences to be delivered, but alone they do not constitute proof of legality. They do not attest to the legality of the supply chain for the timber or timber products⁶⁸]. Certificates of legality can currently only be delivered to processing units. In January 2017, MINFOF issued the first certificates of legality to eight timber processing companies, certifying that operations on their site are legal: CIFM, GVI, SEFECCAM, SFIL, SIM, CAFECO, ALPICAM and SEFAC⁶⁹. In the 2017 Joint Annual Report on implementation of the FLEGT VPA in Cameroon, MINFOF was reported to have issued 18 certificates of legality to 16 operators for the timber processing units, and the Ministry of the Environment, Protection of Nature and Sustainable Development (MINEPDED) awarded 21 compliance certificates with environmental obligations (one of the necessary elements for the issuance of certificates of legality)⁶⁵.

Under Cameroonian law, export licences constitute a proof of legality for Cameroonian timber products⁶⁸. However without a working TLAS underpinning an export licence, these will not recognised in the EU as proof of the legality of the timber or timber products⁶⁸.

Entry into force of the FLEGT VPA was reported to have promoted greater access to information in the forest sector, including creation of a website (<u>www.apvcameroun.cm</u>) as part of implementation of Annex VII of the Agreement^{70,61}. Some of the information required for management is available for concessions (Forest Management Units), but key documents such as annual operating plans, terms of reference and environmental impact assessments are not published regularly⁷⁰. Required attribution information is not available for all types of "small permits". There is little or no publicly available information on log production, processing and export. In some cases, current public data needs to be updated (eg regarding industrial processing capabilities)⁷⁰. Regular publication and updating of information on the VPA website was reported to remain a challenge in terms of access to information in the forestry sector⁷⁰.

Cameroon has successively experimented with a series of "Independent Forest Monitors" (IFMs)²⁷, initially including Global Witness⁷¹, then Resource Extraction Monitoring (REM: 2005-2009)⁷², followed by AGRECO-CEW (2010-2013)²⁷. Since 2010, Independent External Observers led by local civil society organisations continue to play a strong role in independent monitoring, informing MINFOF of cases of non-compliance^{73,65}, and the role of independent observers is foreseen in Cameroon's VPA²⁸. The regional programme CV4C (Citizen Voices for Change) has been implemented in Cameroon since 2017 by national NGOs FODER, FLAG and CED, contributing to the implementation of the National Forest and Fauna Law Enforcement Strategy (SNCFF). The independent NGO monitoring coalition SNOIE (Standardized Independent External Observation System) became ISO 9001 certified in 2018 (the first civil society approach to

monitoring natural resources to achieve such status)⁶⁵. SNOIE is part of informant network used by MINFOF to carry out its activities of monitoring and sanctioning offenders found guilty of illegal logging; since February 2016, 14 denunciation reports produced within the framework of the SNOIE have been transmitted to MINFOF, 10 of which led to a reaction of the administration in charge of forests, with actions including raids of forest brigades and sanctions against offenders including seizures, fines and suspension of forestry licences⁷⁴.

RELEVANT LEGISLATION AND POLICY¹

National laws and regulations relevant to the timber legality definition in the FLEGT <u>Voluntary Partnership Agreement</u> between the EU and Cameroon can be found in Annex II of the VPA. Legislation texts are available via the Cameroon VPA website: <u>http://apvcameroun.cm/index.php/infos-legales</u> [website currently unavailable]. The NEPCon (2017) '<u>Cameroon Timber Legality Risk Assessment</u>' lists other relevant national legislation.

Main texts referenced in the 2011 VPA²

- Law No 92/007 of 14 August 1992 Employment Code
- Law No 94/01 of 20 January 1994 The Forest Code
- Law No 96/12 of 05 August 1996 framework law on management of the environment
- Law No 98/015 of 14 July 1998 relating to establishments classified as dangerous, unhealthy or obnoxious
- Finance Law No 2002/003 of 19 April 2002 setting out the General Tax Code (and subsequent revisions)
- Decree No 95-531-PM of 23 August 1995 establishes the implementation details for the 1994 Forest Code
- Decree No 99/781/PM of 13 October 1999 details the rules for the application of Article 71 (1) (amended) of the Forest Code
- Decree No 99/818/PM of 9 November 1999 lays down the provisions for setting up and operating the establishments
- Decree No 2005/577 of 23 February 2005 lays out the procedures for performing environmental impact assessments (EIAs)
- Decree No 2008/2115/PM of 24 January 2008
- Order No 013/MINEE/DMG/SL of 19 April 1977
- Order No 222/A/MINEF of 25 May 2002 -Establishes procedures for developing, approval, monitoring and control of the implementation of forest management plans for the production forests in the permanent forest estate
- Order No 0069/MINEP of 8 March 2005 describes those activities that are subject to carrying out an environmental impact assessment
- Decision No 0108/D/MINEF/CAB of 9 February 1998 - applying the Rules on activities in forest areas

- Decision No 135/B/MINEF/CAB of 26 November 1999 - laying down the forest classification procedures of the permanent forest domain
- Decision No 0098/D/MINFOF/SG/DF/SDFC adopting the document entitled 'Manual of award procedures and management rules for community forests – Version 2009'
- Circular No
 0354/LC/MINFOF/SG/DF/SDAFF/SN
- Circular 0048/LC/MINFOF/SG/DF/SDFC of 16 January 2009
- Rules on activities in forest areas (NIMF)
- Logging inventory rules, ONADEF, May 1995
- PROC Procedure for drawing up, approving, monitoring and controlling management plans for the productive forest of the permanent forest domain of Cameroon (various technical sheets)
- Terms and conditions of the Centre for Enterprise Development
- Guide on environmental measures in relation to logging in Cameroon (Ministry of the Environment and Nature Protection – March 2005 version)
- Collective bargaining agreement of loggers
- Inventory, management and pre-investment rules, Cameroon National Forest Development Office (ONADEF), June 1991

¹ The list provided may not be exhaustive and is intended as a guide only on relevant legislation.

² Includes texts relating to forestry, environment, trade and export. See the VPA Annex II for texts relating to social obligations.

Other relevant texts

- Decree No 95/678 of 18 December 1995 sets up an indicative framework for land use in southern forest areas.
- Decree No 95-466-PM of 20 July 1995 establishes the conditions for the implementing Cameroon's wildlife regulations
- Decree No 96/642/PM of 17 September 1996 covers the basis and methods of collection of royalty and taxes on forestry activities
- Decree No 98/ 003 forest royalties
- Decree No 99/370/PM of 19 March 1999
- Decree No 2000-092-PM of 27 March 2000 amends Decree No 95-531-PM (see above) and establishes detailed rules for the implementation of the forest regime
- Decree No 2005/2869/PM of 29 July 2005 sets forth the enactment provisions of a number of provisions of the CITES
- Decree No. 00002 / MINEPDED of 8 February 2016 defining the standard outline of the terms of reference and the content of the environmental impact notice
- Order No 74-1 of 6 July 1974 establishing the land tenure regime
- Order No 74-2 of 6 July 1974 establishing the domanial regime
- Order No 00122/MINEFI/MINAT 29 April 1998 obligates the establishment of a management committee responsible for managing forest royalties in all sub-divisions and villages where forest concessions are situated
- Order No 0872/MINEF of 23 October 2001 classification of forest species
- Order No 2001/ 0518/MINEF/CAB of 21 December 2001 - Clarifies forest species classification
- Order No 0070/MINEP of 22 April 2005 Defines the different categories of operations whose realization is subjected to an environmental impact assessment
- Order No 067/PM of 27 June 2006 provides the organizational set-up and operational procedure of the Inter-Ministerial Coordination and Monitoring Committee for the implementation of the CITES
- Order No 00001/MINEP 3 February 2007 defines the general content of Terms of Reference for Environmental Impact Assessments and provides guidelines for its formulation

- Joint Order No 0000076/MINADT/MINFI/MINFOF of 26 June 2012 - laying down the procedures for planning, use and monitoring the management of revenue from the exploitation of forest resources and wildlife, meant for Communities and the riverine population.
- Order No 004 / MINFOF of 7 February 2013 laying down the criteria and procedures for the issue of certificates of legality under the FLEGT licensing scheme
- Order No 0021/PM/MINNFOF of 2 March 2018
- Ordinance No 99/001 of 31 August 1999 establishing the procedures for the classification of the forests in the permanent forest areas of the Republic of Cameroon
- Decision No 1354/D/MINEF/CAB of 26 November 1999
- Decision No 104/D/MINFOF/SG/DF/SDAFF/SN of 02 March 2006 - provides the designation and definition of the role of the CITES Scientific Authority in Cameroon.
- Decision No. 0842/D/MINFOF of 12 April 2012
- Decision No 173/D/MINFOF/SG/DF/SDAFF/SAG of 28 April 2016
- Decision No 0546A/MINFOF/SG /DF/CJ/SDIAF of 05 October 2016, making the Exploitation Inventory Guidelines enforceable.

LEGALLY REQUIRED DOCUMENTS³

Information on legally required documents can be found in the FLEGT <u>Voluntary Partnership Agreement</u> between the EU and Cameroon (Annex II). Additional information taken from NEPCon (2017) '<u>Cameroon Timber Legality Risk</u> <u>Assessment</u>'.

Note - Cameroon forest legislation stipulates many timber supply methods, in relation to which the legality concerns differ. Legality matrices for eight supply method are detailed in Annex II of the FLEGT VPA.

• Legal right to harvest:

- Deed of classification of the forest (permanent forest estate)
- Provisional logging agreement
- Forestry approval granted by the competent authority
- Certificate for registration as a timber processor
- Letter of approval of the subcontracting agreement
- Order approving the management plan issued by the Administration of Forestry (Communal forests and FMUs) or the order approving the simple management plan (Community Forest)
- Five-year management plan and operation plan for the current year (FMUs)
- Hammer mark registration records

• For harvesting:

- Approval of the enterprise or its various subcontractors having been involved in certain management activities (inventories, forestry)
- Service contracts with (an) approved structure(s) or a public body
- Count certificate or certificate confirming compliance with logging rules
- Annual harvesting site certificate (CAAC) or annual operating permit (PAO)
- Letter of approval of the terms of reference for the audit/environmental impact study
- Certificate of conformity of the environmental impact study/audit
- Notification of the start of activities
- Count certificate or certificate confirming respect of the logging rules
- Worksite books (DF10) or SIGIF declaration
- For processing:
 - Certificate for registration as a timber processor
 - Environmental conformity certificate
- Environmental requirements:
 - Environmental conformity certificate
 - Environmental inspection report
 - Record of environmental offences

- For trade and transport:
 - Certificate of legality of the supplier(s)
 - Waybill secured and signed by the competent authority of the Ministry responsible for forests, for the transportation of logs and cut timber by road
 - Special declaration on note stamped by the competent manager in the event of transportation by rail
 - Loading certificate of the competent customs department (transport in containers) together with the loading report of the forestry department and the place of loading
- Taxes and Fees
 - Certificate of registration of the bank guarantee if required
 - Payment receipts (annual forestry charge [RFA], felling tax [TA], plant entry tax [TEU]), local development taxes or other forestry taxes if stipulated in the terms and conditions)
 - For export:
 - $\circ \quad \mbox{Certificate for registration as timber exporter}$
 - Justification for the payment of progressive surtax
 - Export permit
 - Tax clearance

³ The list provided may not be exhaustive and is intended as a guide only on required documents.

References

- 1. MINFOF. Secteur forestier et faunique du Cameroun: faits et chiffres. (Ministry of Forestry and Wildlife, 2017).
- 2. Rights and Resources Initiative. Tenure data tool. (2018). Available at: https://rightsandresources.org/en/workimpact/tenure-data-tool/#.WjjlOVVI9ph. (Accessed: 2nd July 2018)
- 3. FAO. *Global Forest Resources Assessment 2015. Desk reference.* (Food and Agriculture Organization of the United Nations, 2015).
- 4. EU FLEGT Facility. Cameroon VPA Status (FLEGT). (2017). Available at: http://www.euflegt.efi.int/cameroon. (Accessed: 6th February 2018)
- 5. FAO. Contribution of the forestry sector to national economies, 1990-2011, by A. Lebedys and Y. Li. Forest Finance Working Paper FSFM/ACC/09 (Food and Agricultural Organization of the United Nations, 2014).
- 6. MINFOF. Annuaire statistique 2017 du MINFOF. (Ministère des Forêts et de la Faune, 2017).
- 7. United Nations Statistics Division. UN Comtrade Database. (2020). Available at: https://comtrade.un.org/data/. (Accessed: 3rd February 2020)
- 8. Global Forest Watch. Cameroon Country Profile. (2019). Available at: http://www.globalforestwatch.org/country/CMR. (Accessed: 26th September 2019)
- 9. FSC. FSC facts and figures March 2019. (Forest Stewardship Council, 2019).
- 10. PEFC. PEFC global statistics. June 2019. (2019).
- 11. European Timber Trade Federation. Cameroon Industry Profile (Timber). (2016). Available at: http://www.timbertradeportal.com/countries/cameroon/. (Accessed: 12th December 2017)
- 12. Cerutti, P. O., Mbongo, M. & Vandenhaute, M. State of the timber sector in Cameroon. (CIFOR, 2015).
- 13. UNEP-WCMC. The Species+ Website. Nairobi, Kenya. Compiled by UNEP-WCMC, Cambridge, UK. (2018). Available at: https://speciesplus.net/. (Accessed: 2nd July 2018)
- 14. World Justice Project. Rule of Law Index 2020. 212 (2020). Available at: https://worldjusticeproject.org/sites/default/files/documents/WJP-ROLI-2020-Online_0.pdf. (Accessed: 17th March 2020)
- 15. Transparency International. Corruption Perceptions Index 2019. (2020). Available at: https://www.transparency.org/cpi2019. (Accessed: 17th March 2020)
- 16. Fund for Peace. Fragile States Index 2020. (2020). Available at: https://worldpopulationreview.com/countries/fragilestates-index/. (Accessed: 17th March 2020)
- 17. Freedom House. Freedom in the World. (2020). Available at: https://freedomhouse.org/countries/freedom-world/scores. (Accessed: 17th March 2020)
- 18. European Commission. Eurostat. (2018). Available at: http://ec.europa.eu/eurostat/data/database. (Accessed: 7th February 2020)
- 19. European Timber Trade Federation. Country profile Cameroon. (2018). Available at: http://www.timbertradeportal.com/countries/cameroon/. (Accessed: 15th April 2020)
- 20. Hoare, A. *Tackling illegal logging and the related trade: what progress and where next?* (Chatham House, 2015).
- 21. CONAC. Rapport sur l'état de la lutte contre la corruption au Cameroun en 2011. (CONAC, 2011).
- 22. Talla, M. & Wete Soh, L. Systematization of corruption in the forest and wildlife sector in Cameroon: failed effort to promote good governance? Working Paper N°02 December 2017. (FODER, 2017).
- 23. Mahonghol, D., Cheteu, L. B., Ngeh, P., Ringuet, S. & Chen, H. K. *Evaluation de la mise en oeuvre du système de traçabilité du bois au Cameroon*. (TRAFFIC, 2016).
- 24. Les Amis de la Terre & Milieudefensie. *Legal imports into Europe of illegal timber from Cameroon*. (Les Amis de la Terre, 2008).
- 25. Betti, J. L. Background information on the conservation status of Bubinga and Wenge tree species in African countries. Report prepared for the International Tropical Timber Organization (ITTO). (ITTO, 2012).
- 26. Forêts et Développement Rural. Coordination de l'Observation Indépendante Externe. Rapport Annuel 2018. (2018).
- 27. Hoare, A. Illegal logging and related trade The response in Cameroon. (Chatham House, 2015).
- 28. The European Union & The Republic of Cameroon. *L 92/4: Voluntary Partnership Agreement between the European Union and the Republic of Cameroon on forest law enforcement , governance and trade in timber and derived products to the European Union (FLEGT).* (Official Journal of the European Union, 2011).
- 29. Forest Legality Initiative. Logging and export bans. (2019). Available at: http://www.forestlegality.org/content/loggingand-export-bans. (Accessed: 31st March 2019)
- 30. European Commission. European Union Restrictive measures (sanctions) in force. (2019). Available at: https://www.sanctionsmap.eu/#/main.
- 31. United Nations Security Council. *Consolidated United Nations Security Council sanctions list 28 November 2019*. (United Nations Security Council, 2019).
- 32. Alemagi, D. & Kozak, R. A. Illegal logging in Cameroon: causes and the path forward. *For. Policy Econ.* **12**, 554–561 (2010).
- 33. Cerutti, P. O. & Lescuyer, G. The domestic market for small-scale chainsaw milling in Cameroon: present situation,
- opportunities and challenges. (CIFOR, 2011).
- 34. NEPCon. Timber legality risk assessment. Cameroon. 75 (2017). Available at: https://www.nepcon.org/sites/default/files/library/2017-06/TIMBER-Cameroon-Risk-Assessment.pdf.
- 35. Commission Nationale Anti-Corruption (CONAC). Rapport sur l'état de la lutte contre la corruption au Cameroun en 2016.

(2016).

- 36. Commission Nationale Anti-Corruption (CONAC). *Rapport sur l'état de la lutte contre la corruption au Cameroun en 2017*. (2017).
- 37. Binam Bikoi, A. C., Sipehouo Metchebong, J. G. & Ntamack, H. *Etude sur l'etat des lieux des pratiques de corruption dans le secteur des forets et de la faune*. (MINFOF, 2012).
- 38. Commission Nationale Anti-Corruption (CONAC). *Rapport sur l'état de la lutte contre la corruption au Cameroun en 2013*. (2013).
- 39. Commission Nationale Anti-Corruption (CONAC). *Rapport sur l'état de la lutte contre la corruption au Cameroun en 2014*. (2014).
- 40. Cerutti, P. O., Tacconi, L., Lescuyer, G. & Nasi, R. Cameroon's hidden harvest: commercial chainsaw logging, corruption, and livelihoods. *Soc. Nat. Resour.* **26**, 539–553 (2013).
- 41. World Bank. *Cameroon: the path to fiscal decentralization*. (World Bank, 2012).
- 42. Global Witness. *Logging in the shadows. Global Witness* (Global Witness, 2013).
- 43. Greenpeace Netherlands. *CCT's timber trade from Cameroon to Europe: a test case for EUTR's due diligence requirement*. (Greenpeace, 2015).
- 44. Greenpeace. La Socamba: How Cameroon's stolen wood reaches international markets. (Greenpeace, 2016).
- 45. Court of Noord-Holland. de Rechtspraak pronunciation ECLI:NL:RBNHO:2017:4474. (2017). Available at: https://uitspraken.rechtspraak.nl/inziendocument?id=ECLI:NL:RBNHO:2017:4474. (Accessed: 6th February 2018)
- 46. MINFOF. Point of order: the Ministry of Forestry and Wildlife rebukes the Greenpeace report. (The Times Journal, 2015).
- Journal du Cameroun. Forestry Minister debunks Greenpeace allegations. (2017). Available at: https://www.journalducameroun.com/en/forestry-minister-debunks-greenpeace-allegations/. (Accessed: 6th February 2018)
- 48. SNOIE. Syntheses des rapports d'observation independante externe Cameroun (rapports produits en Novembre 2018). (Système Normalisé d'Observation Indépendante Externe, 2019).
- 49. Greenpeace. Palm oil's new frontier: how industrial expansion threatens Africa's rainforests. (2012). Available at: http://www.greenpeace.org/usa/wp-content/uploads/2015/07/PalmOilsNewFrontier.pdf.
- 50. Greenpeace. *Licence to Launder*. (Greenpeace, 2014).
- 51. SNOIE. Deux entreprises forestières dénoncées pour exploitation forestière illégale par le Système Normalisé
 d'Observation Indépendante Externe (SNOIE) suspendues. SNOIE Note d'information No. 8, Novembre 2019. 3 (2019).
 Available at: https://forest4dev.org/download/2680/. (Accessed: 1st December 2019)
- 52. Lescuyer, G. et al. National demand for sawnwood in Cameroon. A barrier to or an opportunity for promoting the use of timber resources of legal origin? (FAO and CIFOR, 2017).
- 53. Lescuyer, G., Cerruti. P.O. & Tsanga, R. Contributions of community and individual small-scale logging to sustainable timber management in Cameroon. *Int. For. Rev.* **18**, 40–51 (2016).
- 54. Cerutti, P. O. *et al.* Social impacts of the Forest Stewardship Council certification in the Congo basin. *Int. For. Rev.* **19**, 50–63 (2017).
- Karsenty, A. The crisis in the European tropical timber sector in Central Africa (commentary). Mongabay 1 August 2018.
 (2018). Available at: https://news.mongabay.com/2018/08/the-crisis-in-the-european-tropical-timber-sector-in-central-africa-commentary/. (Accessed: 5th December 2019)
- 56. Swedwatch. Undercutting rights: human rights and environmental due diligence in the tropical forestry sector. A case study from Cameroon. (2019).
- 57. Greenpeace Africa. Greenpeace Africa expresses shock over Wijma activities in Cameroon. (2018). Available at: https://www.greenpeace.org/africa/en/press/1929/greenpeace-africa-expresses-shock-over-wijma-activities-incameroon/. (Accessed: 5th December 2019)
- 58. FERN. The Blauwe Loper project: a climate-friendly bridge built with timber from a conflict zone? 14 May 2018. (2018). Available at: https://www.fern.org/news-resources/the-blauwe-loper-project-a-climate-friendly-bridge-built-with-timberfrom-a-conflict-zone-95/. (Accessed: 5th December 2019)
- 59. Republic of Cameroon. *Law No. 94/01 of 20 January 1994 to lay down forestry, wildlife and fisheries regulations*. (Republic of Cameroon, 1994).
- 60. European Commission and Cameroon. *Aide memoire du Conseil conjoint de mise en oevre de l'Accord de Partenariat Volontaire APV FLEGT du 15 Decembre 2015*. (2015).
- 61. European Commission and Cameroon. *Aide memoire du 8eme Conseil conjoint de mise en oevre de l'Accord de Partenariat Volontaire APV FLEGT du 27 Septembre 2016.* (2016).
- 62. Green Development Advocates (GDA) & SAILD. *FLEGT -VPA Cameroon-European Union : Overview of 6 Years of Implementation*. (Green Development Advocates (GDA) & SAILD, 2017).
- 63. FAO-EU FLEGT Programme. [Finalising the Volutary Partnership Agreement in Cameroon. A major economic challenge for small and middle companies of the wood sector. Technical Document no. 2]. (2017).
- 64. SGS. SGS Contract profile: technical assistance for the implementation of a timber traceability system. (SGS, 2010).
- 65. Cameroon and the European Union. *Joint annual report 2017 on implementation of the FLEGT VPA in Cameroon*. (2017).
- 66. TEREA. Final report Volume 1 (main report). Evaluation of the EU FLEGT Action Plan (Forest Law Enforcement Governance and Trade) 2004-2014. (2016).

- 67. FODER. Commentary note on future opportunities in line with the fight against illegal logging and deforestation. (2017).
- 68. EU FLEGT Facility. Q&A Cameroon-EU Voluntary Partnership Agreement. (2017). Available at: http://www.euflegt.efi.int/q-and-a-cameroon. (Accessed: 23rd September 2019)
- 69. ATIBT. A further step forward in the implementation of the FLEGT VPA in Cameroon. (2017). Available at: https://www.atibt.org/en/a-further-step-forward-in-the-implementation-of-the-flegt-vpa-in-cameroon/. (Accessed: 6th February 2018)
- 70. Bassalang, M. M. Analyse de la transparence dans le secteur forestier au Cameroun. (CED, 2018).
- Global Witness. IFM in Cameroon (2000-2005). (2005). Available at: https://www.globalwitness.org/en/campaigns/forests/independent-forest-monitoring-ifm/ifm-cameroon/. (Accessed: 6th February 2018)
- 72. Resource Extraction Monitoring. *Progress in tackling illegal logging in Cameroon. IM-FLEG Cameroon 4 year summary report: 2005-2009.* (REM, 2009).
- 73. SNOIE. Syntheses des rapports d'observation independante externe Cameroun (rapports produits de Décembre 2017 à *Mai 2018*). (alisé Observation Indépendante Externe SNOIE, 2018).
- 74. FAO-EU FLEGT Programme, SNOIE & FODER. Briefing news. The denunciations of the civil society bring the administration in charge of the forests to act. (2018). Available at: https://oiecameroun.org/images/documents/articles/Briefing_news_denunciation_of_the_civil_society_push_the_admin istration_to_act.pdf.

These EU Timber Regulation country overviews support the work of EU Competent Authorities in assessing potential legality risks of timber and timber products from source countries of importance to the EU market. They were produced following a thorough review of the publicly available literature, as well as requesting additional information from Competent Authorities and experts. To ensure their accuracy, relevance and completeness, country overviews have been subject to comprehensive peer review, including consultation with relevant national ministries/agencies and in-country experts, the European Commission and Competent Authorities, with special thanks to expert input from EFI EU FLEGT Facility. These documents are updated periodically based on available information. Specific inputs can be sent to timber@unep-wcmc.org, for potential inclusion in the next update. Published overviews are available from https://ec.europa.eu/environment/forests/timber_regulation.htm.

