Mind the moratorium

Ending criminality and corruption in Africa’s logging sector

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Summary

Logging moratoria – or bans on the felling, transportation and export of forest and wood products – have been widely used in Africa as a means of preventing the degradation of natural forests, often with considerable support from the international community. However, their impact has almost universally fallen far short of expectations. Violations range from the questionable issuance of exceptions and the sale of concessions despite there being a ban in place, to continued illicit and artisanal logging. Evidence suggests that moratoria are increasingly being used to allow influential political and business elites to consolidate control over the logging sector in their own favour, rather than for their stated development objectives. This brief argues that it is time for a sharp reconsideration of the value of moratoria as a tool for forest governance in Africa.

Key points

• A radical rethink of our approach to good forest governance in Africa is needed; one that recognises the criminal consortia active in the logging sector, often including political and business elites, foreign corporations and criminal networks.
• In a number of key countries, it is no longer viable to consider moratoria as an effective strategy for forest governance, unless they entail absolute prohibitions on all aspects of the logging supply chain, which are reinforced by independent oversight and supported by import restrictions in the major destination markets.
• Capacity for monitoring and enforcement of moratoria, and sanctions related to illicit logging need to be stepped up at international, continental and regional levels if any credible results are to be achieved to reverse rates of deforestation.
In a few hours, one man with a chainsaw can do irreversible damage to a tree that may have taken hundreds of years to grow.

Africa contains about 15% of the world’s remaining forests, and the continent’s rural poor are particularly dependent on them as a mainstay of their livelihood. The United Nations reports that forests generate an average of 6% of sub-Saharan Africa’s gross domestic product – triple the world average.¹ Eighteen African countries are among the 24 countries worldwide that rely on forests for 10% or more of their economic resources.² Meanwhile, in Africa, wood supplies about 80% of domestic energy needs, a significantly higher proportion than anywhere else in the world.³

It is therefore of critical importance that urgent steps be taken to reverse deforestation trends. Africa’s rate of deforestation is double the global average.⁴ But when broken down into individual countries, as shown in Figure 1 below, the statistics become more alarming. Zimbabwe, for example, in 1990 had a forest area as a percentage of total land mass of approximately 57%; 25 years later, that area was only 36% – a reduction of over a third. Over the same period, Guinea-Bissau, the country with the highest proportion of forested area in Africa, lost more than 8% of its forests. The Democratic Republic of the Congo (DRC) lost 5%, but with its globally significant absolute forest area, the volume lost has been huge: in just five years (from 2010 to 2015) the country is estimated to have lost 1.500 net hectares of forest.⁵ Three African countries – Nigeria, the DRC and Zimbabwe – rank among the top 10 for the greatest absolute annual losses of forest area between 2010 and 2015.⁶ Figure 1 shows the deforestation rates in a number of sub-Saharan African countries.

Moratoria are one of the primary policy tools used by African governments to gain control over the forestry sector in their countries. Under the guise of resource conservation, numerous African countries have declared a moratorium in the timber sector since 2000 (see Annex 1: Non-exhaustive list of moratoria and timber export bans in Africa).

Moratoria can have two components: a timber-felling ban, to prevent deforestation, and an export ban, to stop timber being shipped overseas. They can be applied in a blanket way to all forms and species of wood, or selectively to specific species, such as the high-value rosewoods, for example, or to timber in different stages of processing. For instance, there may be a stipulated export ban for sawn logs (unprocessed wood), but not for planked timber.

**Figure 1: Forest area as percentage of land area, selected countries, 1990-2015**

![Figure 1: Forest area as percentage of land area, selected countries, 1990-2015](image)

Source: World Bank⁷
Moratoria are usually heralded positively by the international community and perceived as a firm step taken by governments towards improving the governance of their forestry sectors. However, they can cause considerable, unanticipated impacts on timber supply and they can indirectly affect sectors – and individuals – that depend on forest resources for their livelihoods. And while wisdom would usually suggest that they should be partnered with efforts to build a sustainable forestry sector, to improve legislation and regulation, and build up the plantation sector, the reality in Africa is that these complementary actions are seldom considered or implemented.

Moratoria often seem predicated on false assumptions, such as continued national self-sufficiency in timber supply, or they fail to consider the impact on domestic industries and businesses that rely on timber as an input. As a consequence, nations that should be timber exporters find themselves importing from neighbouring countries or further afield, and rising timber prices constrain the viability and growth of upstream industries. The importance of economic reforms geared towards more market-based production and consumption, together with the implications of open international trade in forest products, are typically only indirectly acknowledged in national logging-ban policies.8

Nations that should be timber exporters find themselves importing from neighbouring countries or further afield

Instead, the evidence, including from research presented in the latest ENACT regional research paper, Razing Africa: Combating criminal consortia in the logging sector,9 suggests that in a number of African states, instead of the moratoria signalling efforts to improve forest governance for their citizens, they have been used strategically by certain politically well-connected individuals to exert greater control over the timber marketplace, giving selected exceptions to foreign commercial entities with whom key officials – and in some cases the head of state – appear to have an established relationship. In such cases, profits are diverted for economic self-gain or political interests.

Neither are the reverberations on markets, governance, stability and crime limited exclusively to the country instituting the ban. Our research suggests that logging bans can have a broader disruptive effect on the licit and illicit trade in neighbouring countries, beginning with timber smuggling and then extending into other forms of transnational crime and corruption. In some cases, this has had severe ramifications for regional stability.

This policy brief examines the evidence on logging moratoria and, drawing on international experience, proposes a set of focused recommendations for the African Union, the regional organisations, multilateral institutions and the international community at large, centred on how they should design and support moratoria to achieve goals of better forest governance.

Examining the contemporary evidence on logging moratoria

The challenges of contemporary forest governance in Africa, and the controversies caused by forest moratoria – particularly when announced in isolation from a broader forest governance strategy – were starkly highlighted by the most recent logging ban to be imposed on the continent, in Kenya.

East Africa’s coastline is one of the continent’s most biologically diverse areas, supporting wildlife populations of which 60% to 70% are found only in one other region in the world, and 15% are unique to that ecosystem. Yet forest loss here has been profound: between 2000 and 2012, East Africa lost around six million hectares of forest, reducing it to 10% of its original size.10

On 24 February 2018, Kenya’s deputy president, William Ruto, announced a moratorium on timber harvesting ‘in all public and community forests for a period of ninety days, to allow reassessment and rationalization of the entire forest sector in Kenya’.11

In his announcement, Ruto said that the ban was justified because of the negative impacts caused by forest degradation on Kenya’s ongoing drought, as well as declining food and water security. Critics of the move observed that a 90-day timeframe was unlikely to be sufficient to restore years of environmental damage. Kenya’s constitution stipulates that the country must have 10% forest cover; the forested area currently stands at only 7.4%, and the government has stated that it aims to expand its forests to meet the mandated target by 2030.
However, in recognition of the severity of the problem, the ban was ushered in to halt current logging practices while Environment and Forestry Cabinet Secretary Keriako Tobiko gathered a task force to address the water shortage caused by logging. The plan includes a review of the Forest Conservation and Management Act of 2016 to identify any legal loopholes that facilitate illicit logging.

This is not Kenya’s first attempt to impose a moratorium on the logging sector, designed, ostensibly, to combat deforestation and drought. In 1999, the then Kenya Forest Department implemented a similar 90-day ban on logging in public forests, which was subsequently followed by a 10-year ban. However, the largest milling companies, Pan Africa Paper Mills, Raiply, Timsales and Comply Industries were exempt from the bans, and collectively logged 75% of available wood from state forests throughout the decade-long moratorium.

The most recent moratorium, imposed in February 2018, sought to respond to the lessons learned from the previous experience, by imposing a complete ban. But although this initiative looked better on paper, the latest Kenyan moratorium has been treated with scepticism by both business and the public, as it meant the cost of timber rose almost immediately by over 50%. A number of industries expressed their concern. The Kenyan tea industry, for one, immediately raised a red flag, as wood-fuelled fire is integral to the drying process of tea leaves. Kenya is the world’s largest exporter of black tea leaves and, as a sector, the tea industry generated in 129 billion shillings (US$1.3 billion) from global exports in 2017.

At the local level, the ban on harvesting of wood for producing charcoal (used as a domestic fuel) has affected the basic functioning of essential social services, such as schools and hospitals, which depend on wood for fuel. With local fuel prices having risen by as much as three times, some schools have been forced to close, and construction of new facilities that depend on wood for construction have shelved their plans given the escalating cost of timber. Where logging rights are divided between indigenous communities and the state, the ban has raised tensions among different ethnic communities.

Criticism for the moratorium has also been levelled against Ruto, who is accused of implementing the ban as a PR stunt. Ruto has a chequered history when it comes supporting environmental initiatives, and this has raised public suspicion about his real motives for the moratorium. In 2017 he was accused of pandering to interest groups to win votes by announcing he would allow people to move back into the Mau Forest, which was evacuated in 2009 to protect the rapidly degrading forest and Kenya’s largest natural water tower. Conservationists claim that this action could lead to the destruction of the forest, an outcome that stands in stark contrast to the stated objective of the current moratorium.

If the government acts on its threats to crack down on and prosecute artisanal and small-scale loggers, it is likely to face harsh criticism.

Tobiko’s actions have also prompted people to question the legitimacy and true purpose of the moratorium. Tobiko is reported to be considering a proposal to allow an Indian investment group to build a sugar factory over almost half of the Nyangweta Forest, despite the current ban. Although Tobiko has acknowledged that the factory would decrease the region’s forest cover to below 2%, and that it may cause nearby rivers to dry up, he said that he would be relying on an audit to determine whether or not to proceed with the factory. However, allegations by an unnamed forestry department official on the task force he convened to undertake the audit and to evaluate Kenya’s timber resources suggested that ‘most of them [the audit committee] are activists [lobbyists] and have no knowledge on forests issues. They will end up misadvising the Cabinet Secretary.’

Just six weeks after the February moratorium was imposed, on 18 April public pressure from businesses led to the complete moratorium being relaxed for private commercial operators. Much like the 10-year earlier ban, a new provision of the moratorium was introduced to allow for private commercial forest operators and timber products importers [to recommence operations] ... if they agree to a joint verification and confirmation of source of product with the ministry. Although the amendment may help in addressing the issue of local demand, the fact that commercial logging is allowed to continue while
the transport and export of timber is still banned significantly increases the risk that loggers will seek illicit ways to bring their products to market.

In the meantime, artisanal and small-scale loggers have ignored the moratorium outright and continued their activities, as observed in a report by Kenya’s Citizen TV the day after the announcement. Fully dependent on logging for their livelihoods, these loggers have argued that the moratorium has no legal basis because no executive order was signed by the president on the matter, nor has any legislation been passed explicitly banning logging in Kenya. Nonetheless, the government has stated it will arrest those in violation of the ban.

The Kenya Forest Service, the governmental agency responsible for increasing national forest cover, forest management and conservation in Kenya, met with the principal secretary for the Department of Environment and Forestry, Charles Sunkuli, on 4 May 2018 to discuss their progress on enforcing the moratorium. If the government acts on its threats to crack down on and prosecute artisanal and small-scale loggers, it is likely to face harsh criticism – especially if commercial logging interests are allowed to continue unchecked.

The ways in which Kenya handles its logging moratoria – with its elements of corruption, questionable concessions, corporate pressure, consumer strain and outright violations with the assistance of illicit networks and cross-border smuggling – are by no means unique.

For example, in March 2018, the government of the DRC announced that it was making plans to lift the moratorium on the allocation of new industrial logging concessions in the world’s second largest tropical rainforest. This reversed a statement made only four months earlier, at the 23rd session of the Conference of the Parties to the UN Convention on Climate Change (COP 23), when the DRC’s environment minister announced that the moratorium on allocating new logging concessions would persist. Government actions have clearly spoken louder than words: in February 2018, the DRC awarded three new concessions, two of which gave two Chinese companies access to 6 500 km² of the country’s richest peatland, and it apparently has started a process to allocate 14 more concessions.

These actions would suggest that the DRC is finally bringing an end to the troubled and often violated moratorium that has been in place since 2002, and which was purportedly designed to protect the second largest area of rainforest in the world.

The moratorium was imposed by ministerial order in May 2002 to arrest what threatened to become an uncontrolled pillaging of the country’s huge forests in the period following the country’s civil conflict. Under the auspices of a World Bank-crafted, internationally underwritten forest strategy, this formidable natural resource and critical environmental zone was meant to be turned into a sustainable and ecological economic driver. Yet, the strategy never stood a chance. Almost immediately, violations of the ban proliferated. A report issued five years later estimated that over 100 logging concessions, covering 15 million hectares of rainforest, had been allocated illegally. A national commission, which had been convened to review the licences, rather than prosecuting or penalising those who were logging illegally, chose to regularise their permits, translating them into long-term concessions. This entrenched the status of overall impunity for forest crimes.

Considerable evidence has been documented of extensive, high-level corruption and elite capture in the forestry sector

Throughout the 16 years since the DRC’s logging ban was imposed, the international community have clung to the World Bank’s strategy and the moratorium, regardless of the long-standing and widespread evidence of its continued violations, and the low motivation on the part of government to in any way meet or enforce its provisions. The government has tightly retained the right to dispense concessions, failing to put in place a system for transparent and competitive tendering, which is detailed in the plan.

Considerable evidence has been documented of extensive, high-level corruption and elite capture in the forestry sector, resource diversion and the violent intimidation of communities who seek to exercise rights to artisanal logging, which were meant to form an integral part of the forest governance agreement. The Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) has documented evidence of systematic violations and the issue of fraudulent permits for high-value endangered tree species, to the point that they recommended CITES
parties to no longer accept any permits issued by the DRC without CITES verification.\textsuperscript{31}

A Global Witness investigation estimated that, by 2015, the Congo’s entire timber trade, worth US$97 million, was illegal. Their inspections of the country’s industrial logging concessions revealed a ‘catalogue of illegality’ in each and every case, including logging outside permit areas, felling of protected species, overexploitation, and the falsification of records and export permits.\textsuperscript{32}

In addition to the direct sale of concessions for logging, a 2018 Global Witness investigation has revealed how actors within the DRC government are working through shadow networks of shell companies and secrecy jurisdictions to illegally reclassify two protected areas to allow oil exploitation. This would suggest that the long-standing pattern of questionable compacts between foreign corporate interests and political elites in the country continues to pillage the country’s natural resources and threaten the country’s sustainability and stability for their own personal enrichment. Furthermore, the Global Witness investigation suggests the timing of the deals and the subsequent payouts have been engineered to finance a possible unconstitutional move by the Kabila regime to stave off election challenges and win support for a lifting of presidential term limits that would see him out of office in the year to come.\textsuperscript{33}

In the ENACT research report that accompanies this policy brief,\textsuperscript{34} the authors present evidence of another five contemporary instances where logging moratoria and their strategic violations have been used to enrich the political elite in the countries in question. Three of these are briefly discussed below.

Guinea-Bissau has had a five-year timber export ban in place since the election of the present government in 2014.\textsuperscript{35} But, in a bizarre move, the moratorium was not extended to timber felling, and about a dozen licence holders were permitted to continue felling.\textsuperscript{36} Farmers reported that felling happens in the north of the country, 70 km from Bissau, where ‘up to 40 containers can be loaded daily from the region’.\textsuperscript{37} While official shipments of timber were stopped and stockpiled at port, evidence suggested that logs were still being diverted illegally across land borders to Banjul, Gambia, and the Casamance area of Senegal.\textsuperscript{38}

In late 2017, the disputed prime minister, Umaro Embaló, suddenly announced a partial lifting of the 2015 moratorium. According to the testimony of a confidential source, he told ministers that he was ‘exceptionally authorizing the export of 1 500 containers filled with logs’, which had been under guard since 2015 at Bissau’s docks. This was announced publicly at the end of January 2018.\textsuperscript{39} The timber will be sold to China, Vietnam and India, and the exports are expected to raise US$12.6 million in revenue for the state.\textsuperscript{40} Interviews in the capital suggested that the moratorium had been exceptionally lifted by the ruling party as a means to raise campaign funds and support for the May 2018 elections.\textsuperscript{41}

The logging sector has become yet another one of Africa’s natural-resource economies that has fallen prey to criminal consortia

Sierra Leone has also demonstrated a linkage between campaign financing and its timber moratorium. In July 2017, a logging moratorium was promulgated by the Sierra Leonean government, although it established an export quota of 5 000 containers over a six-month period. However, in December 2017, only five months into the ban, according to sources, emissaries were sent by the president to promise loggers that the moratorium would be lifted and logging concessions renewed if they were prepared to vote the incumbent party, the All People’s Congress, for re-election in March 2018.\textsuperscript{42} In January 2018, 17 000 containers (a 240% increase from the original 5 000 containers) of timber were authorised for export from Sierra Leone. Furthermore, six additional timber felling licences were spontaneously approved by the State House without any prior notice to the ministries that normally certify such permits.\textsuperscript{43}

Zambia imposed a complete export, import and transit ban in the logging sector in April 2017, intended ostensibly to prevent both domestic and regional illicit logging. All trucks found transporting timber in the country were impounded, and the timber seized and forfeited to the state. In August 2017, all the timber confiscated in terms of the transit ban was sold by the Zambia Forestry and Forest Industries Corporation Limited (ZAFFICO) in a closed bidding session. The
parastatal opted not to open the auctions to tender but handpicked four Chinese dealers, which have been buying the timber since August 2017.44 These were the same companies that had also been handpicked by ZAFFICO to buy timber confiscated during an earlier logging ban in 2012, suggesting a practised strategy to raise funds.45

Together, these cases present a solid body of evidence that shows, across the continent, that the logging sector has become yet another one of Africa’s natural-resource economies that has fallen prey to criminal consortia – a dangerous intersection of political, business and criminal interests.46 The complicity between these three elements undermines the efficacy of response frameworks. The repeated use of fraud, misuse of authority, evasion of tax and other civic responsibilities, the diversion of resources out of the public domain into the private, and the increasing use of violence – whether threatened, targeted or indiscriminate – are all prevalent in the forestry sector in Africa. They are also hallmarks of organised crime.

**Recommendations**

The numerous violations of moratoria on the continent suggest that the unquestioned assumption that halting logging is either necessary or sufficient to ensure conservation goals has resulted in many of Africa’s forests being nominally protected, while, in reality, deforestation continues not only unchecked, but often at an accelerated rate.

It has yet to be credibly proven whether logging bans can be efficiently implemented in any context, whether they achieve desired results and whether they are as effective as other possible strategies. Unfortunately, once the ban is proposed or in place, few other alternatives are considered.

In Africa in particular, evidence has clearly shown that logging restrictions and bans are easily compromised, and cannot compensate for the underlying problems of weak governance and regulatory capacity, misuse, chronic corruption and high-level elite exploitation of the sector by certain individuals for their own interests. In fact, in the majority of cases moratoria have compounded these problems rather than ameliorated them.

The constraints that a logging ban entails can weigh most heavily on the communities whose livelihoods depend on forest resources, unless a spectrum of alternatives are put in place to mitigate that impact and develop sustainable alternatives. Furthermore, as the case studies in our ENACT report have shown, restrictions can result in the flourishing of illicit and abusive practices, both domestically and across borders.

In Africa, in particular, evidence has clearly shown that logging restrictions and bans are easily compromised

Instead of supporting bans as a strategy for forest governance, the international community, the AU, regional organisations and individual states that serve as transit or destination markets for African timber, need to work in a concerted and integrated way to isolate timber supply chains from countries at high risk of illegal logging, and to reduce the space for criminal consortia to infiltrate and capture the profits from the sector. This requires a number of specific actions:

1. **Prohibition**

In order to achieve the goals of protecting forest resources and controlling illicit logging, moratoria need to be on felling, transport and export – and anything less than such a comprehensive prohibition would constitute a compromised effort to consolidate control over illicit logging, rather than prevent it. In cases where existing or partial moratoria or export bans are in place, the international community should view them with suspicion and censure any announcement of exceptions to such bans, or the selling of seized logs.

2. **Stockpile destruction rather than sale**

A key debate currently under way is whether stockpiles of seized illicit logs should be resold or burned. Our recommendation is to move as rapidly as possible to the destruction of stockpiles.

The problem with sell-offs, a route that a number of countries have chosen to take, ostensibly to recapture the value of wood already logged, is that it sends a message that the wood will somehow still get to market.
and there is therefore still an incentive to fell it illicitly. Noting that the real value is earned after the high-value species have left the continent, to permit the resale of stockpiles of illicitly felled logs means selling the wood short of its value, negating the deterrent value of a moratorium.47

It is worth considering the example of Mozambique, which has one of Africa’s highest rates of deforestation, where national timber operators in 2017 urged the government to burn all confiscated timber in order to send a powerful market signal to illegal loggers.48

The role of Asian actors in targeting high-value tree species has been shown to be an important driver in illicit logging

3. Import bans

Moratoria in Africa can and should be mirrored by import bans from destination countries. The EU and the US have both enacted sweeping legislation and comprehensive measures to ensure the veracity of the international timber trade, and these have broadly been positively evaluated as having contributed to a meaningful reduction in illicit timber entering these markets.49

It is now time for Asian countries to take similar steps. The role of Asian actors in targeting high-value tree species has been shown to be an important driver in illicit logging.50 Chinese companies pressuring African governments to release concessions during moratoria are a stand-out contributor to their failure.

More than a decade’s worth of investments have been made to engage the Chinese government to improve management of the China-Africa timber trading chain.51 Although China has taken some important steps to encourage sustainable and legal timber imports, there is arguably considerably more that could be done.52 We would encourage China to follow the prohibition principle – cease all imports from countries with moratoria, and apply export restrictions to those species that are listed on the International Union for Conservation of Nature/CITES endangered-species lists.

The African Union and the regional blocs that are genuinely committed to protecting their natural resources and species biodiversity could consider using other trade conditionalities contingent on these reforms.

4. Monitoring, oversight and sanctions for moratorium violations

Given that few governments have shown evidence of being able to manage their forestry resources in a transparent and equitable way, investments in the forestry sector need to be underpinned and overseen by multiple oversight mechanisms, and penalties need to be stipulated in advance for transgressions. There are multiple ways this can be achieved.

Independent international oversight and monitoring frameworks can be put in place, with donor funding contingent on performance. Community mechanisms for reporting illicit logging (which would need to be coupled with engagement and awareness strategies) can be developed in parallel to build a mechanism by which the oversight function can transition to civilian oversight in the long term.

The role of CITES, which has an enforcement mandate but very limited capacity for monitoring, proactive intervention or subsequent enforcement, could be significantly strengthened. Areas to consider are in (a) analysis: analysing comparative trade data to identify disparities between import and export figures, which might indicate legitimate trade flows are being used to mask illicit timber trafficking; (b) enhancing the capacity of the CITES law-enforcement unit either directly, or through secondments or partnerships with other states and multilateral enforcement bodies (e.g. INTERPOL, EUROPOL, AFRIPOL, etc); and (c) enhancing the capacity of CITES to hold and monitor data relating to active CITES permits. CITES permits should ideally never be issued retroactively, or only in special cases identified by the CITES Secretariat, where they should be identified as a retroactive payment and filed with the CITES Secretariat. Importing countries should refuse to accept permits or certificates issued retroactively.53

The forestry sector can emulate the practices of the extractives sector, with initiatives such as those spearheaded by the Extractive Industries Transparency Initiative, requiring transparency in contracting and beneficial ownership. Such initiatives could require logging companies to disclose payments to foreign jurisdictions, particularly in producer countries.
5. Focus on disrupting the criminal consortia

In the context certain countries find themselves in, such as protracted conflict or state instability, it is the case that control over natural resources, including the forestry sector, lies in the hands of criminal consortia, and not the state, government or other legal entities. In such cases, the disruption of the criminal consortia must take precedence over all other interventions.

A focus on investigating, disrupting or destabilising the criminal consortia entails distinguishing between the corrupt and criminal, and the positive and legal actors.

Some NGOs, including the Environmental Investigation Agency, C4ADS and Global Witness, have focused on investigating and publicly revealing criminal actors in supply chains. Their work should be discussed at international forums, such as the UN, perhaps within the forum of CITES, or at the appropriate AU commissions, and political pressure needs to be applied. Sanctions and asset seizures can be powerful instruments applied to states and individuals alike.

Given the close correlation between countries where logging is most rapacious and the presence of UN peacekeeping or political missions, addressing illicit interests in the forestry sector can also be built into existing and future mandates. The UN has established in the DRC an ‘illicit networks’ task force as part of the MONUSCO mandate, and the political (and criminal) economy of the mining sector in that country has been built into the political engagement and state-building process. Although these efforts are still in their early days, they offer a promising model that could be applied in the case of illicit logging.
## Annex 1: Non-exhaustive list of moratoria and timber export bans in Africa

<table>
<thead>
<tr>
<th>Country</th>
<th>Product scope</th>
<th>Status</th>
<th>Source</th>
<th>Last updated</th>
</tr>
</thead>
<tbody>
<tr>
<td>Côte d’Ivoire</td>
<td>A ban on the export of logs, including teak.</td>
<td>1999 to present</td>
<td>Forest Legality Initiative</td>
<td>May 2016</td>
</tr>
<tr>
<td>DRC</td>
<td>A complete ban on logging and export.</td>
<td>2002 to present, with persistent violations</td>
<td>Global Witness</td>
<td>May 2018</td>
</tr>
<tr>
<td>Gabon</td>
<td>Full ban on exporting logs.</td>
<td>2010 to present</td>
<td>Forest Legality Initiative</td>
<td>August 2017</td>
</tr>
<tr>
<td>Ghana</td>
<td>A ban on felling, harvesting and exportation of rosewood in 2014. A national ban on rosewood export was announced in early 2017, but has been lifted.</td>
<td>First enacted in 2014; reactivated in early 2017; currently lifted</td>
<td>Forest Legality Initiative; World Resources Institute (WRI)</td>
<td>September 2017</td>
</tr>
<tr>
<td>Guinea-Bissau</td>
<td>Five-year timber export ban. Logging was allowed to continue for domestic markets.</td>
<td>Five-year moratorium on timber exports enacted in 2014. In December 2017, an exceptional lifting was authorised by the prime minister of 1 500 containers.</td>
<td>ENACT research</td>
<td>May 2018</td>
</tr>
<tr>
<td>Kenya</td>
<td>A temporary ban on logging with some commercial concessions exempted.</td>
<td>Activated February 2018, just extended at time of publication.</td>
<td>ENACT research</td>
<td>May 2018</td>
</tr>
<tr>
<td>Madagascar</td>
<td>Prohibition on logging, transport and export of rosewood and ebony (Decree 2010-141).</td>
<td>First enacted 1975, followed by multiple fluctuations. Reactivated 2010 to present. Multiple violations have been recorded, with felled rosewood logs seized within the country as well as externally.</td>
<td>Forest Legality Initiative; WRI</td>
<td>December 2017</td>
</tr>
<tr>
<td>Mozambique</td>
<td>Export ban on raw logs. Temporary ban on all logging.</td>
<td>Export ban: 2007 to present. Logging ban, January to June 2017.</td>
<td>Forest Legality Initiative; WRI</td>
<td>April 2017</td>
</tr>
<tr>
<td>Nigeria</td>
<td>Log export ban</td>
<td>1976 to present</td>
<td>Forest Legality Initiative; WRI</td>
<td>May 2016</td>
</tr>
<tr>
<td>Senegal</td>
<td>Log export ban</td>
<td></td>
<td>ENACT research</td>
<td>May 2016</td>
</tr>
<tr>
<td>Sierra Leone</td>
<td>Log export ban since 2010, with exceptions.</td>
<td>Log export ban imposed in 2010 was lifted before the 2012 election. July 2017, another moratorium was established with an export quota of 5 000 containers. In January 2018, a further 17 000 containers were authorised for export, and new felling licences were issued.</td>
<td>ENACT research</td>
<td>May 2016</td>
</tr>
</tbody>
</table>

Sources: Some countries: Forest Legality Initiative.55 others: source provided in table
Notes


9. ENACT report ref needed


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ENACT builds knowledge and skills to enhance Africa’s response to transnational organised crime. ENACT analyses how organised crime affects stability, governance, the rule of law and development in Africa, and works to mitigate its impact.

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