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Background to the research

This country note presents Chatham House's assessment of the likelihood of illegality in the supply chains of the main wood-based products exported by Cameroon. It was prepared to inform our analysis of illegal trade at the international level which has been published as part of the report '[Establishing fair and sustainable forest economies: lessons learned from tackling illegal logging](#)'. This is the most recent in a series of reports on governance and legality in the forest sector in the forest sector, an issue that Chatham House has been monitoring since 2008.

The country note has been published as a background document to explain how the international estimates of illegal trade were made. Thus, it is not intended to provide a comprehensive review of all the available data and information on forest sector legality for Cameroon. International and national experts in Cameroon's forest sector provided feedback on preliminary versions of the country note.

Overview of exports

Cameroon's exports of wood-based products primarily comprise logs destined for China and Vietnam and sawnwood destined for those two countries and the EU-28 (now the EU-27), as illustrated in Figure 1. There is also a large and growing domestic market for timber.¹

However, Cameroon's trade statistics for wood-based exports are not reliable and so interpreting the available data is challenging.² Discrepancies exist between Cameroon's statistics and its trading partners', in particular those of Vietnam. Further investigation is required to determine whether these discrepancies reflect poor records (including misreporting of items in transit) or fraud.

Cameroon signed a Voluntary Partnership Agreement (VPA) with the EU in 2010. While this has resulted in some improvements in governance and legality, implementation has been slow.³

¹ Lescuyer, G., Tsanga, R., Mendoula, E., Ahanda, B., Ouedraogo, H., Fung, O., Dubiez, E. and Logo, P. (2017), *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, <http://www.fao.org/3/i6515e/i6515e.pdf>.

² Pepke, E., Van Brusselen, J., Tekle Y. and Yong, C. (2016), *Timber trade flows and investments between China and six Voluntary Partnership Agreement signatory countries*, EUFLEGT Facility, <https://ec.europa.eu/environment/forests/pdf/efi/Timber%20Trade%20Flows%20and%20Investments%20between%20China%20and%20Six%20Voluntary%20Partnership%20Agreement%20Signatory%20Countries.pdf>.

³ Hoare, A. (2015), *Illegal Logging and Related Trade: The Response in Cameroon*, Research Paper, London: Royal Institute of International Affairs, <https://www.chathamhouse.org/sites/default/files/publications/research/20150121IllegalLoggingCameroonHoare.pdf>; Fern and LoggingOff (2020), *FLEGT VPA Update. How to ensure FLEGT is a success: Make sure we stay the course*, LoggingOff, <https://www.fern.org/publications-insight/how-to-ensure-flegt-is-a-success-make-sure-we-stay-the-course-2020/>.

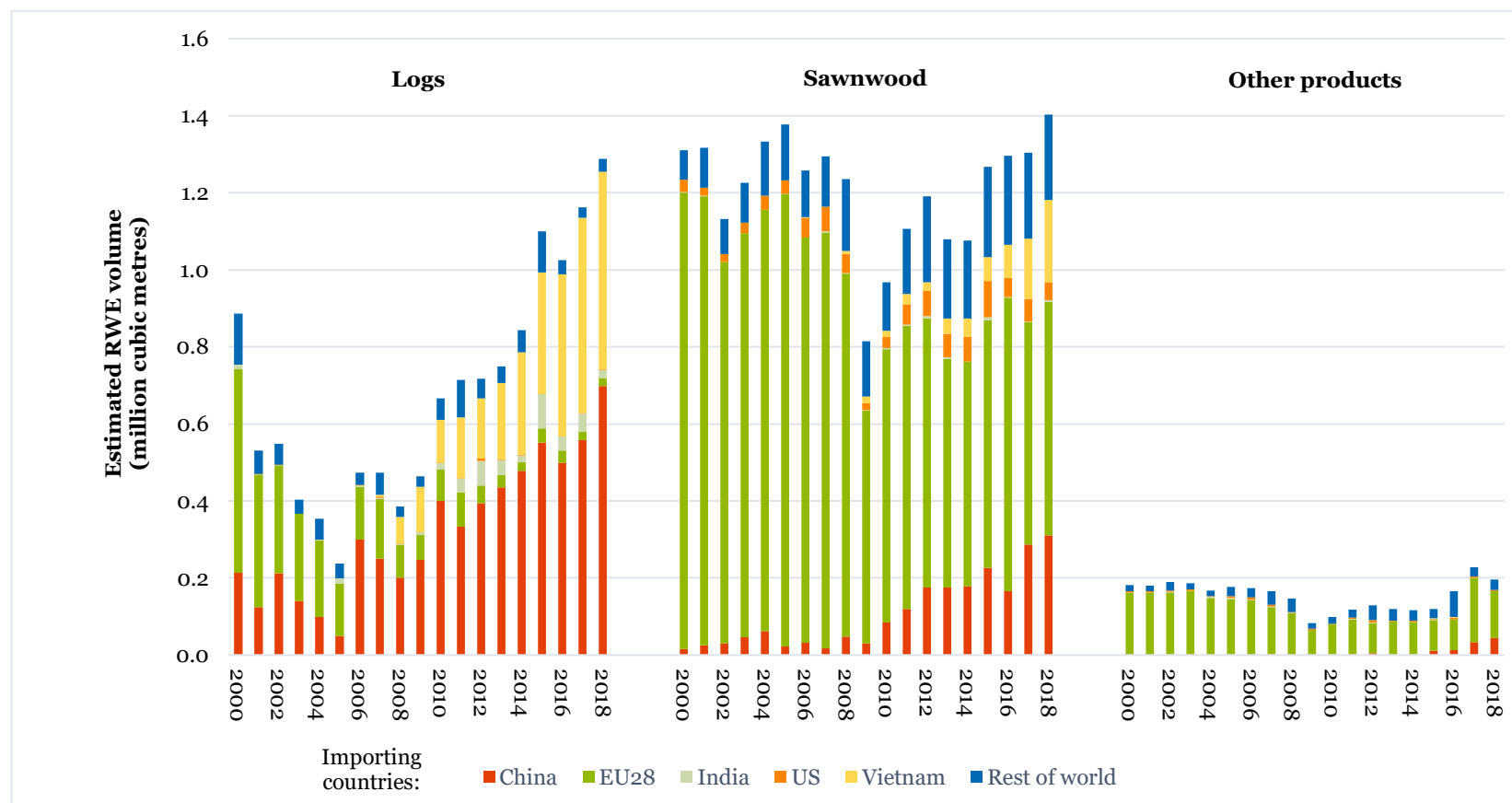


Figure 1: Imports of wood-based products from Cameroon⁴

Source: Chatham House analysis based on data from Eurostat, General Administration of Customs of the People's Republic of China, UN Comtrade and (for Vietnam) occasional, quasi-official publications.⁵

⁴ Standard conversion rates to estimate roundwood equivalent volume have been adopted for all countries, because of a lack of published data for many countries. The rates adopted are as follows, m³ per m³: 1.4 particleboard, 1.8 sawnwood and fibre board, 1.9 veneer and mouldings, 2.3 plywood; and m³ per tonne: 1.6 chips, 2.4 pellets, 2.8 furniture, 3.5 joinery, 4.5 pulp. However, most commentary on RWE volume in the context of Cameroon suggests that 3.0 m³/m³ would better reflect reality than 1.8 for sawnwood.

⁵ See for example: http://goviet.org.vn/upload/aceweb/content/3_BC_chau_phi.pdf

Methodology for estimating illegal logging and trade

The analysis considers five categories of illegal practices common across all countries. These categories are listed below, with examples given of the types of illegal activity that they can include in different countries and regions:

- Customary tenure & resource rights
 - FPIC not obtained from any affected people or communities
 - The rights of any affected people or communities not adequately taken into consideration and addressed in the process of allocating permits or developing management plans; and any loss of rights not adequately compensated
- Award of permits
 - EIAs not conducted in accordance with legal requirements
 - Decision-making process for the award of permits does not follow legally required process; e.g. calls for tenders not published; technical requirements for selection of bids not followed; evidence of corruption in the process
 - Use of proxies where the beneficiary would be ineligible
- Forest management & harvesting
 - Management plans not developed or implemented; e.g. plans do not meet legal requirements; logging in restricted areas; overharvesting of particular species; etc.
 - Health & safety and/or labour laws not complied with; e.g. no provision of safety equipment; employment of illegal immigrants; non-payment of salaries or of minimum legal wage
 - Environmental legislation not complied with; e.g. logging of protected areas or species; non-compliance with requirements for protection of wildlife; pollution of water courses
- Forest sector payments & financing
 - Relevant royalties, fees, taxes and fines not paid
 - Benefit-sharing agreements with local communities not complied with
 - Fraudulent financing / money laundering by concessionaires or in relation to mills
 - Transfer pricing
- Transport & trade
 - Export bans or quotas for certain species or products are breached or exceeded
 - False declarations made; e.g. misdeclarations of species, value, source
 - Non-compliance with CITES

Based on a review of the available data, the likelihood of each of the five categories of illegal practice was assessed for the main exported products.⁶ This was classified either as low (<10 per cent), low to medium (10–30 per cent), medium to substantial (30–60 per cent) or substantial (>60 per cent).

For the earlier years (2000, 2008 and 2013), the likelihood of illegality was determined based on Chatham House analyses in 2010 and 2015⁷, with updates where additional data have since become available. The assessment for 2018 builds on this analysis, using available data and information to assess changes in legal compliance in the last five years of the study period. This included recent Chatham House research into governance reforms, analysis of trade data and the results of perception surveys, as well as a review of reports and data from other organizations.

⁶ This analysis focuses on a limited number of products, these were selected according to three criteria: the scale of trade and rate of change in this, trade flows in which high proportions of illegal timber have been documented, and examples of particular types of illegality.

⁷ Lawson, S. (2014), Methodology for Import-source Estimates of Illegally Sourced Wood Imports: Thailand, South Korea and India, Chatham House Report, London: Royal Institute of International Affairs, <https://chathamhouse.soutron.net/Portal/Default/en-GB/RecordView/Index/187057>; Hoare, A. (2014), Methodology for Estimating Levels of Illegal Timber- and Paper-sector Imports: Estimates for China, France, Japan, the Netherlands, the UK, the US and Vietnam, Chatham House Report, London: Royal Institute of International Affairs, <https://chathamhouse.soutron.net/Portal/Default/en-GB/RecordView/Index/187059>.

Overview of trends in illegality

Illegality in Cameroon's supply chains for export markets has declined since 2000,⁸ but it remains a widespread problem for the domestic market.⁹

In a survey of experts undertaken in 2019 as part of research to examine the impact of the VPA on Cameroon's forest sector, respondents considered that there had been a decline in illegal logging since the period before implementation of the VPA (which was signed in 2010). They estimated average levels of illegal timber for export markets at 52 per cent pre-VPA and 41 per cent post-VPA, and for the domestic market the respective figures were 68 per cent and 61 per cent.¹⁰

Wood-balance analysis undertaken for Chatham House's 2010 assessment indicated that in 1999 about one-third of the timber harvested by concessionaires for export was unlicensed, but that figure had fallen to almost zero by 2007.¹¹ Similarly, in 2009 the independent observer at the time reported that illegal practices among concessionaires had declined in the preceding years.¹² Furthermore, the area of FSC-certified forest increased over the period 2010–17, although in 2018 this area decreased.¹³

However, illegal practices remain widespread. Illegality has characterized the allocation of logging permits. Other issues include the failure to implement social responsibility agreements (*cahiers de charge*), unauthorized logging, logging of prohibited species and laundering of timber through communal forests. Illegalities associated with 'small permits', sales of standing volume, community and communal forests, and artisanal logging have remained at a high level throughout the last two decades. Corruption remains widespread in the sector, although there have been efforts to tackle this.¹⁴

Legality in supply chains from long-term concessions is likely to have improved over the last decade, due to implementation of the VPA and an increased share of production coming from certified and legally verified sources. For example, the Independent Forest Monitoring (SNOIE) in Cameroon reported that there has been increased governmental supervision, fines and penalties against companies involved in illegal behaviour.¹⁵

However, more recently there has been a decline in the presence of long-established EU-based logging groups and a proliferation of new entrants as loggers and/or sawmillers. In addition, small permits and sales of standing volume, where illegal practices are more prevalent, have become an increasingly important source of timber for export markets.¹⁶

⁸ Hoare, A. (2015), *Illegal Logging and Related Trade: The Response in Cameroon*.

⁹ Lescuyer, G., Tsanga, R., Mendoula, E., Ahanda, B., Ouedraogo, H., Fung, O., Dubiez, E. and Logo, P. (2017), *National demand for sawnwood in Cameroon: A barrier to or an opportunity for promoting the use of timber resources of legal origin?*

¹⁰ Cerutti, P. O., Goetghebuer, T., Leszczynska, N., Newbery, J., Breyne, J., Dermawan, A., Mauquoy, C., Tabi, P. P., Tsanga, R., Van Der Ploeg, L. and Wathelet, J-M. (2020), *Collecting Evidence of FLEGT-VPA Impacts for Improved FLEGT Communication*, CIFOR & ADE, <https://www.cifor.org/knowledge/publication/7566/>; The question was not specific to particular supply chains or products.

¹¹ Lawson, S. and MacFaul, L. (2010), *Illegal logging and related trade: Indicators of the global response*, Research Paper, London: Royal Institute of International Affairs,

https://www.chathamhouse.org/sites/default/files/public/Research/Energy%2C%20Environment%20and%20Development/071opr_illegallogging.pdf.

¹² REM (2009), *Progress in tackling illegal logging in Cameroon*, Independent Monitor of Forest Law Enforcement and Governance (IM-FLEG), https://www.rem.org.uk/documents/REM_IMFLEG_Cameroon_Report_endproject.pdf.

¹³ Forest Governance and Legality (undated), 'Cameroon', <https://forestgovernance.chathamhouse.org/countries/cameroon>.

¹⁴ UNEP-WCMC (2020), *Cameroon: Country overview*,

https://ec.europa.eu/environment/forests/pdf/Cameroon_country%20overview%2019.04.2020.pdf; NEPCon Preferred by Nature (2017), *Cameroon: Timber legality risk assessment*, NEPCon,

<https://preferredbynature.org/sites/default/files/library/2017-06/TIMBER-Cameroon-Risk-Assessment.pdf>. Fern and LoggingOff (2020), *FLEGT VPA Update. How to ensure FLEGT is a success: Make sure we stay the course*.

¹⁵ Mbzibain, A. and Ongolo, S. (2019), 'Complementarity, rivalry and substitution in the governance of forests: Learning from independent forest monitoring system in Cameroon', *Forest Policy and Economics* 109, doi.org/10.1016/j.forpol.2019.101981.

¹⁶ Lescuyer, G., Ngouhou Poufoun, J. and Moulendé Fouda, T. (2013), 'Évaluation financière de l'exploitation artisanale du bois d'oeuvre au Cameroun (Financial evaluation of artisanal timber exploitation in Cameroon)', in Eba'a Atyi, R. et al (eds) (2013), *Étude de l'importance économique et sociale du secteur forestier et faunique au Cameroun [Study into the Economic*

Illegal logging in supply chains to China and Vietnam, for which exports have grown rapidly over the last decade,¹⁷ have recently been documented, including violation of export bans, harvesting in protected areas, tax evasion and violations of labourers' rights.¹⁸

and Social Importance of the Forestry and Wildlife Sectors in Cameroon], MINFOF and CIFOR), <https://afrique-centrale.cirad.fr/content/download/4439/34072/version/1/file/Etude+importance+%C3%A9co+secteurs+for%C3%AAts+fau+ne+au+Cameroon.pdf>; Mahonghol, D., Ringuet, S., Nkoulou, J., Amougou Ondoua, G. and Chen, H. K. (2016), *Les flux et les circuits de commercialisation du bois: le cas du Cameroun [Timber flows and marketing channels: the case of Cameroon]*, TRAFFIC, https://www.itto.int/files/itto_project_db_input/2947/Technical/TFL-PD-003-09-R2-M-Technical-Report-4.pdf.

¹⁷ Assembe-Mvondo, S. (2018), *Mapping Sino-Asian investments in Cameroon's forestry sector: operators and flow trends*, WWF, https://dtnac4dfluyw8.cloudfront.net/downloads/mapping_of_sino_asian_investments.pdf; Zongang, A. (2019), *Timber trade in Cameroon controlled by Asian companies*, WWF,

https://dtnac4dfluyw8.cloudfront.net/downloads/timber_trade_in_cameroon_controlled_by_asian_companies.pdf; Mayers, J., Nguiffo, S. and Assembe-Mvondo, S. (2019), *China in Cameroon's forests: A review of issues and progress for livelihoods and sustainability*, IIED, <https://pubs.iied.org/sites/default/files/pdfs/migrate/13599IIED.pdf>.

¹⁸ EIA & CED (2020), *Tainted Timber, Tarnished Temples. How the Cameroon-Vietnam Timber Trade Hurts the Cameroonian People and Forests*, EIA, https://content.eia-global.org/posts/documents/000/001/133/original/EIA_CED_report_tainted_timber_tarnished_temples.pdf.

Summary of estimates

The following table presents an overview of the likelihood of illegal practices in the production of the country’s main exported wood-based products. The ‘overall likelihood’ column reflects all the types of illegal practice and is thus the most pessimistic assessment of the categories for a given year.

	Tenure and resource rights				Award of permits				Forest management				Revenue and finance				Transport and Trade				Overall likelihood of illegality			
	2000	2008	2013	2018	2000	2008	2013	2018	2000	2008	2013	2018	2000	2008	2013	2018	2000	2008	2013	2018	2000	2008	2013	2018
<i>from natural forest:</i>																								
Logs (long-term concessions)	Low	Low	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium
Logs (other)	Low	Low	Low to medium	Medium to substantial	Low to medium	Medium to substantial	Medium to substantial	Medium to substantial	Low to medium	Low to medium	Medium to substantial	Medium to substantial	Low to medium	Low to medium	Medium to substantial	Medium to substantial	Low to medium	Low to medium	Low to medium	Low to medium	Medium to substantial	Medium to substantial	Medium to substantial	Medium to substantial
Sawnwood (long-term concessions)	Low	Low	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium
Sawnwood (other)	Low	Low	Low to medium	Medium to substantial	Low to medium	Medium to substantial	Medium to substantial	Medium to substantial	Low to medium	Low to medium	Medium to substantial	Medium to substantial	Low to medium	Low to medium	Medium to substantial	Medium to substantial	Low to medium	Low to medium	Low to medium	Low to medium	Medium to substantial	Medium to substantial	Medium to substantial	Medium to substantial
Veneer	Low	Low	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium
Plywood	Low	Low	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium
Mouldings & joinery	Low	Low	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium	Low to medium

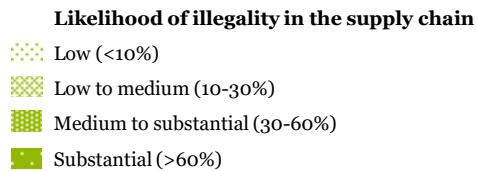


Table 1: Estimated likelihood of illegality for Cameroon’s main exported wood-based products