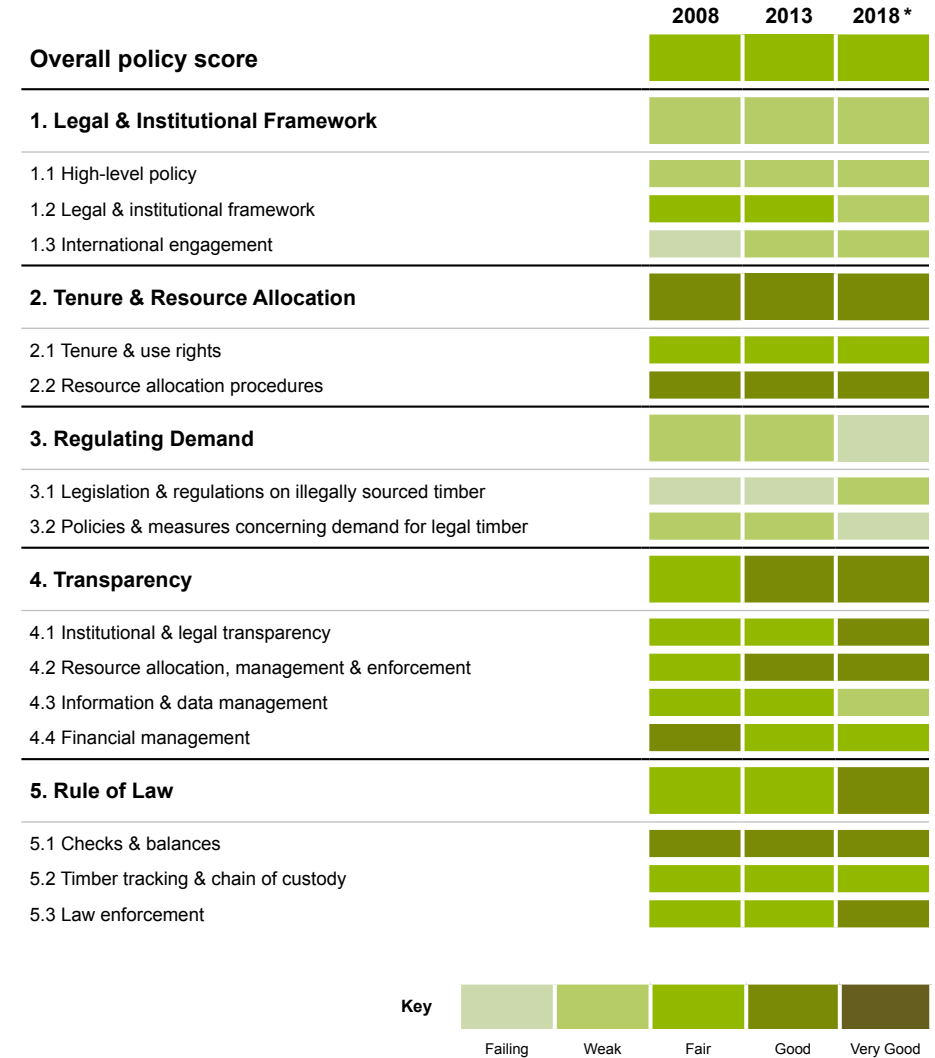


Summary

The 2013 assessment noted that progress had stalled in Cameroon since 2010 and the 2018 assessment arrives at the same conclusion. Most of the improvements to be noted in recent years relate to the implementation of the Cameroon–EU Voluntary Partnership Agreement (VPA) but even in this regard progress overall has been limited. The development of the information management system (SIGIF2), which is to become the backbone of the Timber Legality Assurance System, has faced substantial delay. There were some signs of the government taking ownership of the reform of the legislative framework for the forest sector in early 2016 but this has failed to materialize so far. There remains a lack of policy coherence and institutional coordination between forestry and other land-use sectors.

On a more positive note, the role of the civil society-led independent monitoring has gained greater recognition and the government has proved to be more responsive by acting on the alerts sent out by observers on cases of illegal activities. This, notwithstanding law enforcement and legality assurance, have remained weak overall. In the field, law enforcement is still hampered by the low level of resources allocated and the widespread use of amicable settlements instead of fines and prosecutions. A promising development, yet to become a reality, is the recent elaboration of a procurement framework meant to exclude illegal timber products from public procurement. The draft framework is reportedly pending approval by the office of the prime minister.

Figure 1: Summary of Cameroon's forest policy assessment



Key Forest Policies and Resources

Forest Code (Law No. 94/01 of 20 January 1994), see: <http://www.fao.org/faolex/results/details/en/c/LEX-FAOC004845>

Decree No. 95/531/PM of 23 August 1995 on implementation of the 1994 Forest Code, see: <http://www.fao.org/faolex/results/details/en/c/LEX-FAOC004471>

2005 National Strategy for Forest & Fauna Law Enforcement, see: http://minfoc.cm/apvcameroon/attribution/strategie_nationale_de_controle.pdf

Voluntary Partnership Agreement between the European Union and Cameroon on forest law enforcement, governance and trade in timber and derived products to the European Union (FLEGT), see: [https://eur-lex.europa.eu/legal-content/EN/TX/?qid=1450341651671&uri=CELEX:22011A0406\(02\)](https://eur-lex.europa.eu/legal-content/EN/TX/?qid=1450341651671&uri=CELEX:22011A0406(02))

* A number of questions were added to the assessment in 2018 (noted in the list of questions below). Consequently, the overall scores for 2018 are not directly comparable with those of the previous assessments.

About

Chatham House is monitoring forest governance and legality to assess the effectiveness of government and private sector efforts to tackle illegal logging and trade. An assessment was undertaken of Cameroon's forest policy framework to evaluate the government's response to illegal logging and the related trade. A standard list of questions was used in the policy assessment and answers were scored against three criteria: if the policy exists (0-2), how well designed it is (0-5) and how well implemented it is (0-5). (See tables below).

Timeframe for the research

This assessment is based on the situation at the end of 2018 and the scores refer to this date. However, where there have been significant developments in 2019, these have been noted in the text. The research was undertaken in 2018-19 and finalized in June 2019.

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Acronyms and Abbreviations

BNC	National Control Brigade
CCS	Joint Monitoring Committee
CED	Centre for Environment and Development
CEW	Cameroon Environmental Watch
CIFOR	Center for International Forestry Research
CITES	Convention on International Trade in Endangered Species of Wild Fauna and Flora
CLC	Anti-Corruption Unit
CNS	National Monitoring Committee
CONAC	National Anti-Corruption Commission
CSO	Civil Society Organization
EITI	Extractive Industries Transparency Initiative
ESIA	Environmental and Social Impact Assessment
FLEGT	Forest Law Enforcement, Governance and Trade
FODER	Forests and Rural Development
FPIC	Free, prior and informed consent

IFM	Independent forest monitoring
INGO	International non-governmental organization
MINFI	Ministry of Finance
MINFOF	Ministry of Forests and Wildlife
NDC	Nationally Determined Contribution
NGO	Non-governmental organization
PSRF	Forest Revenue Security Programme
REDD+	Reducing Emissions from Deforestation and Forest Degradation
SIGIF	Forest Information Management System
SNOIE	Standardized External Independent Monitoring System
TLAS	Timber Legality Assurance System
VPA	Voluntary Partnership Agreement
WCO	World Customs Organization
WRI	World Resources Institute

Table 1: Cameroon's Forest Policy Assessment

Legal and Institutional Framework

High-level policy	Does policy exist? (0-2)	Quality of design (1-5)	Level of implementation (1-5)	Justification or additional qualitative explanation
1. Does the country have high-level political and governmental mechanisms in place to tackle illegal logging?				
<i>a. Has a review of the causes and severity of illegal logging been conducted by the government?</i>	2009: 0 2013: 0 2018: 0	2009: n/a 2013: n/a 2018: n/a	2009: n/a 2013: n/a 2018: n/a	The government has not conducted a review of illegal logging and its causes. While studies or reports on illegal logging have been published, their scope does not encompass the whole issue. For instance, specific cases of breaches in the supply chain have been documented by civil society organizations (CSOs) as part of their independent monitoring activities but the underlying causes have not been systematically examined. ¹
<i>b. Is there a national action plan in place for tackling illegal logging?</i>	2009: 2 2013: 2 2018: 2	2009: 3 2013: 3 2018: 3	2009: 3 2013: 3 2018: 2	The 2005 National Strategy for Forest & Fauna Law Enforcement sets out the responsibilities and procedures for control and sanctions. It focuses on logging and post-logging operations (including transport, processing, and export via ports and airports) but pre-logging operations (e.g. concession allocation) are not covered. The EU-Cameroon Forest Law Enforcement Governance and Trade (FLEGT) Voluntary Partnership Agreement (VPA), which is aimed at tackling illegal logging in Cameroon and ensuring the legality of trade to the EU, entered into force in December 2011 and continues to be implemented. Progress made so far includes substantial improvements in the public availability of information and enhanced participation of all stakeholders in decision-making processes in the sector. However, progress has been hampered by challenges with the development of the Computerized Forest Information Management System (SIGIF2) which is to become the backbone of Cameroon's Legality Assurance System. A revision of the legality grids, which also underlie this system, is yet to be undertaken.
<i>c. Does a formal process exist for high-level coordination of action on illegal logging across departments and sectors e.g. a parliamentary committee or inter-ministerial task force</i>	2009: 0 2013: 0 2018: 0	2009: n/a 2013: n/a 2018: n/a	2009: n/a 2013: n/a 2018: n/a	High-level coordination across sectors has not improved since the previous assessment with no processes in place that operate across sectors. In recent years there have been some coordinated actions between the Ministry of Forests and Wildlife (MINFOF) and the various agencies in charge of law enforcement.
<i>d. Are there formal consultation processes in place for multi-stakeholder involvement in developing policy and legislation to tackle illegal logging? These processes should ensure that viewpoints of stakeholders affected by legislation are taken into consideration. (Such processes should take place at central and regional levels of policy development and implementation.)</i>				Legal reform: In 2008, a multi-stakeholder process was initiated to amend the 1994 Forest Law – the first time such an approach had been taken. Consultations were held with key stakeholders and thematic groups were set up to elaborate reform proposals. A range of proposals were sent to the Ministry of Forests but many of the recommendations of civil society were not included in the final draft. After the participatory endeavour was halted in late 2012, a multi-stakeholder workshop, organized by the office of the prime minister, took place in January 2016 to amend the draft revised Forest Code before submission to the office of the president. However, both the results and any follow-up measures from the workshop remain unknown. FLEGT VPA: Under the VPA, three deliberative bodies have been established: <ul style="list-style-type: none"> The National Monitoring Committee (CNS) which is the national decision-making body composed of government, private sector and civil society representatives. The Joint Monitoring Committee (CCS) which comprises relevant government bodies and representatives of the parliament, civil society, the private sector, local communities and indigenous peoples and the EU.

¹ Ivaha, G. (2017), 'Cameroon - Secteur forestier: Guerre des chiffres autour du commerce illégal', Cameroon-Info.Net, 5 Oct. 2017, <http://www.cameroon-info.net/article/cameroon-secteur-forestier-guerre-des-chiffres-autour-du-commerce-illegal-303777.html>

² Community and Forest Platform (2017), Position Paper of the Community and Forest Platform on the Renewal of VPA-FLEGT between Cameroon and the European Union, see: <https://loggingoff.info/wp-content/uploads/2017/02/POSITION-PAPER-PLATE-FORME-1.pdf>

³ Support Service for Local Development Initiatives & Green Development Advocates (2017), Cameroon - European Union VPA-FLEGT at a Crossroads: FLEGT-XIT or FLEGT+? http://new.lavoixdupaysan.net/wp-content/uploads/2017/07/FLEGT-XIT-or-FLEGT_English.pdf

High-level policy	Does policy exist? (0-2)	Quality of design (1-5)	Level of implementation (1-5)	Justification or additional qualitative explanation
				<ul style="list-style-type: none"> The bilateral Joint Implementation Council, co-chaired by the EU and Ministry of Forestry, which oversees VPA implementation. <p>All three bodies have convened on a regular basis and the VPA process has opened up considerable space for stakeholder participation in the forest management process.² As an example of work carried out by the CCS, a working group has been in place since 2014 to analyse and make recommendations on the issue of conversion timber in the VPA context.</p> <p>However, while the views of all stakeholders are now better listened to, the relevance of the VPA bodies has been questioned by some civil society actors³ in a context marked by slow implementation of the agreement and recurring challenges with the development of SIGIF2 (see below).</p>
<i>e. Are there formal processes or policies in place aimed at ensuring a balanced participation of men and women in the development and implementation of forest policies? (Question added in 2018)</i>	2009: - 2013: - 2018: 0	2009: - 2013: - 2018: n/a	2009: - 2013: - 2018: n/a	<p>A National Policy on Gender was adopted in 2014 following from the 1999 National Action Plan for the Integration of Women in Development. The analytical part of the document refers to the role of men and women in the management of production forests, the exploitation of forest resources and community-based forest management. However, none of the seven strategic lines that are set out includes specific provisions with respect to balanced participation in the development and implementation of forest policies.</p> <p>A national guidance document on the promotion of gender equality has been developed by the Ministry of Women's Empowerment and the Family. While the document is said to have been elaborated through cross-sectoral consultations, there is no evidence that the ministry in charge of forests was involved in the process and the document has not been made accessible.</p> <p>As noted below, a gender focal point is in place at the ministry in charge of forests, with the remit to ensure the National Action Plan on the Integration of Women is being implemented in the sector. In practice, few women access decision-making responsibilities in the sector, and mainstreaming gender perspectives has remained a challenge.⁴</p> <p>No mention is made in the 1994 Forest Law and related legislation of gender equity or balanced participation.</p>
<i>f. Is illegal logging considered in the country's climate change strategy e.g. INDC, REDD strategy or other climate change national policy? (Question added in 2018)</i>	2009: - 2013: - 2018: 2	2009: - 2013: - 2018: 2	2009: - 2013: - 2018: 2	<p>Nationally Determined Contributions (NDCs): Although the role to be played by sustainable forest management in increasing carbon sequestration is recognized in the country's NDC (2015), no mention is made of illegal logging.⁵</p> <p>Reducing Emissions from Deforestation and Forest Degradation+ (REDD+): The Readiness Preparation Proposal, approved in 2012, provided for enhanced control against illegal logging.⁶ The National REDD+ Strategy was validated in June 2018 and, at the time of writing, is yet to be made publicly available. In the draft strategy (as of January 2017), illegal logging was mentioned as being one of the causes of deforestation and forest degradation. Improving governance, control and traceability is among the strategic options identified to tackle deforestation and forest degradation. These options are currently being refined and broad implementation is yet to begin while a few pilot initiatives (conducted by CSOs and International Non-Governmental Organizations (INGOs)) are now at a nascent stage.</p>

⁴ International Tropical Timber Organization (ITTO) & African Women's Network for Community Forest Management (REFACOF), (2014), *Les questions de genre dans la gouvernance forestière et contribution des femmes au déboisement et à la dégradation des forêts en Afrique centrale et de l'Ouest*, <http://wk.ixueshu.com/file/50b6ed4cd404972f.html>

⁵ Republic of Cameroon (undated), *Intended Nationally Determined Contribution*, <https://www4.unfccc.int/sites/ndcstaging/PublishedDocuments/Cameroon%20First/CPDN%20CMR%20Final.pdf>

⁶ Republic of Cameroon (2013), *Readiness Preparation Proposal*, <https://www.forestcarbonpartnership.org/system/files/documents/Cameroon%20final%20R-PP-English-January%202013.pdf> <https://www.forestcarbonpartnership.org/country/cameroon>

Legal and Institutional Framework	Does policy exist? (0-2)	Quality of design (1-5)	Level of implementation (1-5)	Justification or additional qualitative explanation
<p>2. Is forest legislation and regulation coherent and unambiguous? <i>(Question added in 2018)</i></p>		<p>2009: 3 2013: 3 2018: 3</p>		<p>There are some inconsistencies between the law and its enabling instruments. Furthermore, some enabling instruments of the 1994 Forest Law have not yet been prepared, such as those relating to customary rights (Art 8) and to compensation for indigenous people in the case of forest reallocation (Art 26).</p> <p>Another issue to be noted relates to the execution of 'transactions' (i.e. administrative sanctions) in enforcement cases. According to Art 146 (1 & 2), transactions are imposed as an alternative to judicial procedures. The timeframe for the execution of 'transactions' is yet to be specified in an implementing regulation. This loophole has resulted in a number of transactions not being fully executed, with non-compliant operators also not facing any judicial consequences.</p> <p>The revision of the law is expected to help correct these deficiencies, but as noted above, little progress has been made in recent years.</p>
<p>3. Is the legislation and regulation for artisanal and micro-scale enterprises coherent and unambiguous, or example, considering all relevant areas of law such as fiscal, rights of association, SMEs, forestry etc. <i>(Question added in 2018)</i></p> <p><i>(Artisanal and micro-scale enterprises are defined respectively as those with 1-3 and 4-10 employees.)</i></p>		<p>2009: - 2013: - 2018: 2</p>		<p>The domestic market, which is overwhelmingly supplied by artisanal and micro-scale informal enterprises, has been overlooked by the 1994 Forest Law. Access to several types of small-scale timber permits is provided for by the Law, including through 'ventes de coupes', or cut timber sales, and harvesting permits. (By law, commercial activity is not allowed under other types of permit, such as individual cut authorizations and the exercise of customary rights).</p> <p>As specified in Decree No 95/531/PM of 23 August 1995 establishing the modalities of the forest regime, harvesting permits can only be granted to duly registered individuals or entities. The application process (Art. 87) includes submission of a technical offer, proof of financial capacities and compliance with fiscal duties, and proof of registration. Art. 89 of the same Decree requires that artisanal processing enterprises be duly registered as well.</p> <p>In practice, it has been found that artisanal loggers tend not to apply for such permits - a situation made even worse by the moratorium on harvesting permits in place from 1999 to 2006, during which the entire artisanal sector dropped out of the formal sector, and by the continued tendency among local forest officials to turn a blind eye to informal activities, as these have remained a considerable source of "parafiscal" arrangements.⁷</p> <p>To facilitate access to formal supply sources, in 2016 the Ministry adopted a decision making it easier for artisanal enterprises to purchase timber rejects from industrial permit holders. Overall however, the incentives for formalization have remained insufficient, leading to a situation where most artisanal enterprises operate without any proper registration and, as such, are regarded as illegal operators.</p>

⁷ Cerutti, P. O. and Lescuyer, G. (2011), *Le marché domestique du sciage artisanal au Cameroun : état des lieux, opportunités et défis*, Document Occasionnel 59. Center for International Forestry Research (CIFOR), <https://www.cifor.org/library/3361/>

Legal and Institutional Framework	Does policy exist? (0-2)	Quality of design (1-5)	Level of implementation (1-5)	Justification or additional qualitative explanation
4. Is there legislative and/or institutional coherence across sectors?				
<p><i>a. Are formalized forest laws and regulations consistent and harmonized with other laws and regulations affecting forests e.g. for land-use planning, agriculture, mining etc.</i> (Question added in 2018)</p> <p><i>(Formalized here is used to distinguish between laws designed and enacted by national government and customary practices/norms of indigenous peoples and local communities).</i></p>		<p>2009: 2 2013: 2 2018: 2</p>		<p>There are major inconsistencies between formalized forestry laws and regulations and other laws and regulations affecting the forest sector (mining, petroleum and land laws) e.g. the forestry legislation describes a zoning plan and prescribes strict respect of the zoning plan especially by forbidding conversion of portions of the permanent forest estate. However, the land law contains no indication of restrictions based on location in the process of concessions allocation. While the former Mining Code stated that the entire territory was available for allocation of mining concessions, the new Mining Code (Law No 2016-017 of 14 December 2016) now provides (Art 8) for the possibility of excluding certain areas from mining prospection or operation in the interests of the state. However, an implementing text is still to be passed to define the scope and, in particular, decide on whether deforestation or forest conservation are part of the state's interests.</p> <p>These conflicting provisions and uncertainty open room for conflicting rights on the same forest land.</p>
<p><i>b. Is there a legal framework for selling or licensing of any timber resulting from forest clearance driven by activities in other sectors?</i> (Question added in 2018)</p>	<p>2009: - 2013: - 2018: 2</p>	<p>2009: - 2013: - 2018: 2</p>	<p>2009: - 2013: - 2018: 1</p>	<p>The 1994 Forest Law includes provisions for the clearance of forests in the permanent estate subject to evidence of the conversion being made in the public interest. Art. 16 lists the requirements for such operations to take place and also stipulates that 'the allocation of forest resources must be done in accordance with the land planning master plan'. The process includes a declassification procedure which requires the classification of areas of comparable size elsewhere to offset the declassified area. Art. 9 of Decree No 95/531/PM of 23 August 1995 establishing the modalities of the forest regime further specifies the rules for issuing a clearance permit in the permanent estate.</p> <p>As per the law, timber originating from the clearance of cultivated customary land (non-permanent forest estate) cannot be put on the market.</p> <p>In the permanent estate, Art. 73 of the Forest Law stipulates that timber products originating from forest clearance are to be harvested by the forestry administration. Art. 110 of Decree No 95/531/PM stipulates that timber products originating from salvage licenses are to be acquired either by a public company or through public auctions. In practice, only the latter have been used by the forestry administration.</p> <p>Salvage licenses are, together with harvested timber removal licenses and cut timber sales, among the six types of permits covered by the VPA. The administration has so far only relied on the latter through allocation procedures that have been found to be non-compliant since they are not provided for in Decree No. 95/531/PM.⁸ Furthermore, it is understood that cut timber sales should not be granted in the case of forest clearing operations.</p> <p>As such, in spite of an existing framework for the sale of timber resulting from forest clearance, implementation has remained challenging and the legal status of such timber products remains unclear.</p>

⁸ Centre for Environment and Development (2017), *Analyse des conversions des forêts par les grands investissements en Afrique centrale*, <http://www.cedcameroun.org/wp-content/uploads/2017/11/Analyse-des-conversions-des-Forêts.pdf>

Legal and Institutional Framework	Does policy exist? (0-2)	Quality of design (1-5)	Level of implementation (1-5)	Justification or additional qualitative explanation
<p><i>c. Is there a legal framework for selling or licensing of timber produced by informal enterprises? (Question added in 2018)</i></p> <p><i>(Informal enterprises are defined as those that are owned and controlled by member(s) of a household(s), are unincorporated, are unregistered, their size falls below a certain threshold, do not have a complete set of accounts, produce goods that are meant for sale or barter etc.)</i></p>	<p>2009: - 2013: - 2018: 0</p>	<p>2009: - 2013: - 2018: n/a</p>	<p>2009: - 2013: - 2018: n/a</p>	<p>As explained above, no legal framework governs the informal sector, which by definition is illegal in the strict sense of the law.</p> <p>The domestic timber market was included in Cameroon's VPA and the Timber Legality Assurance System (TLAS) will apply to all timber produced in the country whether for export or domestic consumption.</p> <p>There have been increasing efforts by the government in recent years to promote the use of legal timber on the domestic market and to devise incentives for informal operators to enter the formal sector. This includes the ongoing development of a public procurement policy on timber (see below) as well as facilitating the supply of legally-harvested timber.</p>
<p><i>d. Are there systems in place for cross-sectoral coordination between ministries and agencies responsible for planning and land-use allocation? (Question added in 2018)</i></p>	<p>2009: - 2013: - 2018: 2</p>	<p>2009: - 2013: - 2018: 3</p>	<p>2009: - 2013: - 2018: 1</p>	<p>The National Scheme for Land Planning and Sustainable Development, developed in 2016, constitutes the overarching framework for land use allocation. Pursuant to Law No. 2011/008 of 06 May 2011 on sustainable development and land planning, an inter-ministerial committee has been established to ensure cross-sectoral coordination, but it has been largely inactive to date.</p>
<p>5. Is gender considered within policy-making and implementation?</p>				
<p><i>a. Is there a designated agency/ focal point with the mandate to ensure gender perspectives are mainstreamed in forest policies? (Question added in 2018)</i></p>	<p>2009: - 2013: - 2018: 2</p>	<p>2009: - 2013: - 2018: 2</p>	<p>2009: - 2013: - 2018: 1</p>	<p>A representative from the Ministry of Women's Empowerment and the Family was reportedly in place in the recent past at the ministry in charge of forests to ensure the National Policy on the Integration of Women was being applied to decision-making processes. As part of the implementation of the 2014-25 Commission of Central African Forests Convergence Plan, the Direction for Cooperation and Planning is now in charge of ensuring gender mainstreaming in internal policies at the ministry in charge of forests.</p> <p>However, for lack of information, it was not possible to identify more specifically the responsibilities of the agency and focal point mentioned above nor to determine the (presumably limited) impact their action has had.</p>
<p><i>b. Are there processes or policies in place to assess gender impacts in the development and implementation of forest policies? (Question added in 2018)</i></p>	<p>2009: - 2013: - 2018: 0</p>	<p>2009: - 2013: - 2018: n/a</p>	<p>2009: - 2013: - 2018: n/a</p>	<p>No such system seems to be in place.</p>

International engagement	Does policy exist? (0-2)	Quality of design (1-5)	Level of implementation (1-5)	Justification or additional qualitative explanation
6. What level of international cooperation has been shown by the country?				
<i>a. Does the country have formalized trade or customs arrangements with major trading partners e.g. FLEGT VPAs or free trade agreements which include specific provisions on illegal logging?</i>	2009: 1 2013: 2 2018: 2	2009: n/a 2013: 4 2018: 4	2009: n/a 2013: 1 2018: 2	<ul style="list-style-type: none"> FLEGT-VPA: The FLEGT VPA has been ratified by Cameroon and has been in force since December 2011. In spite of some progress, the implementation of the VPA has been faced with challenges (see above) and the issuance of FLEGT licenses is yet to be achieved. Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES): Cameroon is party to CITES under which the export of several timber species (such as Afrormosia, Bubinga and Wenge) is subject to the issuance of CITES licenses and Non-Detriment Findings. Enforcing CITES requirements is thought to provide promising opportunities for collaboration between customs officers from a range of timber exporting countries and China. With support from the NGO TRAFFIC, the World Customs Organization Timber Trade Guidelines were finalized in late 2017. Cameroonian customs officers were involved in this exercise (see below).
<i>b. Does the country have a system in place for sending and receiving enforcement alerts regarding illegal shipments in transit to destination countries?</i>	2009: 0 2013: 0 2018: 0	2009: n/a 2013: n/a 2018: n/a	2009: n/a 2013: n/a 2018: n/a	There is no mechanism in place within the country for sending enforcement alerts regarding illegal shipments in transit to destination countries.

Tenure and Resource Allocation

Tenure and use rights	Does policy exist? (0-2)	Quality of design (1-5)	Level of implementation (1-5)	Justification or additional qualitative explanation
7. Are property, use rights and tenure arrangements clearly defined, documented and secure including those of indigenous and local communities?				
<i>a. Does the law require that property, use rights and tenure arrangements are set out on publicly accessible maps and/or Geographical Information Systems (GIS) and demarcated at ground-level?</i>	2009: 1 2013: 2 2018: 2	2009: 2 2013: 3 2018: 3	2009: 1 2013: 1 2018: 2	<p>The national legislation provides for demarcation at ground level. No clear provision is made regarding the publication of maps but such requirements exist under the VPA.</p> <p>The legislation provides for the definition and demarcation of forest categories (protected areas, logging concessions etc). For instance, Art 4 of Ministerial Order No 0222/A/MINEF of 25 May 2001 provides for the demarcation at ground level of logging concession boundaries including demarcation of communities' use rights. Besides, Art 6 lists specifications for the map to be included in the management plan (including the various land use areas within the concession). However, there is no provision in the law for such maps or management plans to be made publicly available although the maps produced as part of management plans – a mandatory feature – tend to be billposted in the villages surrounding forest concessions.</p> <p>The interactive Forest Atlas, developed by the World Resources Institute (WRI) using a MINFOF-run database, provides information on the location of industrial forest concessions and small logging permits as well as community forests, communal forests, agro-industrial concessions, hunting concessions and mining concessions. Approved management plans, which include concession maps, have also been uploaded.⁹</p> <p>Implementation: The public availability of maps does not present major challenges. On the other hand, demarcation at ground level is more problematic. Recent independent forest monitoring reports have documented a number of logging operations beyond concession boundaries or annual logging areas which are linked at least in part to poor implementation of the requirements on demarcation. A ministerial circular note (No 0083/LC/MINFOF/CAB of 05 June 2018) was recently published calling for field officers to fully carry out their duty as it was found out that a number of ground-level demarcation certificates had been signed off without any prior field observation.¹⁰</p>
<i>b. Are there formalized mechanisms in place for resolving conflicting or overlapping property rights?</i>	2009: 2 2013: 2 2018: 2	2009: 3 2013: 3 2018: 3	2009: 3 2013: 3 2018: 4	<p>There is no over-arching arbitration mechanism but every case is treated individually. In the case of overlapping rights as part of the forest classification process, the 1994 Forest Law provides for consultations with local communities to negotiate the allocation of land to them. The options available to mount legal challenge as listed above also apply here.</p> <p>Design: It should be noted that the official position endorsed by court rulings is that since communities do not own forests, they are considered as third-parties in forest management, and therefore do not have legal standing unless they are granted community forests – which remains the best way to secure rights over a given area.</p> <p>Implementation: The options listed above have in recent years proved to provide opportunities for communities to oppose management decisions and assert their rights.</p>

⁹ MINFOF & WRI, 'Forest Atlas of the Republic of Cameroon', <https://cmr.forest-atlas.org/map>

¹⁰ See: https://oiecameroun.org/images/documents/rapports/Rapport_mission_PAPEL_Doumo-Mama_15-19122017.pdf

Tenure and use rights	Does policy exist? (0-2)	Quality of design (1-5)	Level of implementation (1-5)	Justification or additional qualitative explanation
<i>c. Are there formalized mechanisms in place for accommodating customary rights in law and regulations?</i>	2009: 1 2013: 1 2018: 1	2009: 3 2013: 3 2018: 3	2009: 2 2013: 2 2018: 2	<p>The Forest Law and regulations recognize customary use rights to some extent. In particular, Art 8(1) of the 1994 Forest Law recognizes the use or customary rights of 'local populations to make the most of all forest products, wildlife and fish save for protected species for personal use' (i.e. not for commercial use). Art 26(1) further stipulates that use rights are to be taken into account for the classification of forests but, should the rights be restricted on the grounds of consistency with the nature of the forests in question, indigenous populations shall receive compensation.'</p> <p>Art 37 & 38 of Section II of the Forest Law lay down the principles that govern the establishment and management of community forests. In such areas, all forest products are the sole property of the communities concerned. Use rights are however subject to the development and validation of a simplified management plan.</p> <p>Design: Use rights as defined in the 1994 Forest Law are only one part of customary rights to land and resources. Furthermore, the implementing texts called for by Art 8 and Art 26 mentioned above are still to be put in place.</p> <p>Implementation: The absence of the implementing regulations for some provisions of the Forest Law results in a loose application of the existing mechanisms. Besides, field inspections carried out by the administration rarely focus on the accommodation of customary rights. This, notwithstanding, community forests do provide opportunities to better secure customary rights.</p>
<i>d. Does the legal and policy framework provide for gender-equal use rights and tenure?</i> (Question added in 2018)	2009: - 2013: - 2018: 1	2009: - 2013: - 2018: 2	2009: - 2013: - 2018: 1	<p>Gender-equal rights are provided for by the Constitutional Law. However, under the community property regime, which is the default marriage regime in Cameroon, the husband is legally in charge of managing the household's assets (Art. 1421 of the Civil Code).</p> <p>While the law ensures equal inheritance rights for widows and daughters as compared with their male counterparts, women in consensual unions are not provided for which is an issue that has become increasingly acute with the growing number of young people engaged in such unions in Cameroon.¹¹</p> <p>In practice, tenure arrangements at the community level are governed by customary laws (as per the 1974 Land Ordinance) which tend to favour men with regards to the possession of land. There is no legal provision to facilitate women's access to forest resources in spite of the crucial role women play in providing livelihoods from such resources.¹²</p>

¹¹ Rights and Resources Initiative (2017), *Power and Potential. A Comparative Analysis of National Laws and Regulations Concerning Women's Rights to Community Forests*, http://rightsandresources.org/wp-content/uploads/2017/07/Power-and-Potential-A-Comparative-Analysis-of-National-Laws-and-Regulations-Concerning-Womens-Rights-to-Community-Forests_May-2017_RRI-1.pdf

¹² ITTO & REFACOF (2014), *Les questions de genre dans la gouvernance forestière et contribution des femmes au déboisement et à la dégradation des forêts en Afrique centrale et de l'Ouest*, http://www.itto.int/files/itto_project_db_input/3047/Technical/SyntheseGen_Vers2Juin14_FINAL%20Tech.pdf and Fonjong, L. Sama-Lang, I. and Fombe, L. (2010), 'An Assessment of the Evolution of Land Tenure System in Cameroon and its Effects on Women's Land Rights and Food Security' *Perspectives on Global Development and Technology* 9(1-2):154-169, March 2010, https://www.researchgate.net/publication/233688687_An_Assessment_of_the_Evolution_of_Land_Tenure_System_in_Cameroon_and_its_Effects_on_Women's_Land_Rights_and_Food_Security

Resource allocation procedures	Does policy exist? (0-2)	Quality of design (1-5)	Level of implementation (1-5)	Justification or additional qualitative explanation
8. Do resource allocation regulations and procedures include measures consistent with good forest governance?				
<i>a. Is there a prequalification process which is designed to exclude inappropriate bidders from resource allocation awards?</i>	2009: 2 2013: 2 2018: 2	2009: 4 2013: 4 2018: 4	2009: 3 2013: 3 2018: 3	<p>A pre-selection process is described in Decree 95/531/PM establishing the modalities of the forest regime (Art 58 for small-scale logging rights and Art 64 for forest concessions).</p> <p>Design: There is a set of minimum criteria that bids must meet in order to be considered including, when applicable, a record of prior compliance with forest management commitments.</p> <p>Implementation: Evidence exists that at least some companies have been granted logging rights in spite of having failed to meet their commitments in the past which can be tracked in the Records of Disputes. Likewise, the tools in place to ascertain the true identity of the bidder have proved to be weak in the past as a number of logging rights have been granted to transnational interests using national figureheads.</p>
<i>b. Is there a competitive award process which is designed to be open to all eligible bidders?</i>	2009: 2 2013: 2 2018: 2	2009: 4 2013: 4 2018: 4	2009: 3 2013: 3 2018: 3	<p>Art 51 of Decree No 95/531/PM of 23 August 1995 establishing the modalities of the forest regime makes provisions that forest concession allocation must be competitive.</p> <p>Design: Bids are examined by an Inter-Ministerial Commission, the composition and functioning of which are described in Chapter III of the Decree, together with the examination process.</p> <p>Implementation: The competitive process is regarded as ensuring greater transparency overall. In the past, however, there have been cases of wrongful communication of information in order to provide 'favoured' candidates with details about their competitors.</p>
<i>c. Does the law require prior informed consent procedures or stakeholder consultations for local communities with respect to logging interests and rights to be carried out?</i>	2009: 2 2013: 2 2018: 2	2009: 3 2013: 3 2018: 3	2009: 3 2013: 2 2018: 2	<p>As noted above, requirements do exist in the legislation (e.g. Decree No 2005/0577/PM of 2005 on the conduct of Environmental Impact Assessments) that make the conduct of Environmental and Social Impact Assessments (ESIAs) mandatory for any project with an impact on the natural environment and neighbouring communities.</p> <p>Design: The process involves consultation but does not go as far as to seek consent. Communities can however challenge the findings of the ESIA.</p> <p>It should be noted that National Directives for obtaining free, prior and informed consent (FPIC) were developed and adopted in 2014 by the Ministry of the Environment, Nature Conservation and Sustainable Development. While these guidelines are primarily applicable to REDD+ initiatives in Cameroon, their design could very well extend to the entire forest sector.¹³</p> <p>Implementation: In practice, as regards to the award of forest concessions, FPIC is rarely used. Public notices are issued before the beginning of forest management and logging operations but these public notices are not sufficiently disseminated.</p>
<i>d. Are measures to protect and develop forest-based livelihood opportunities for local communities within concession areas built into concession contracts?</i>	2009: 2 2013: 2 2018: 2	2009: 4 2013: 4 2018: 4	2009: 3 2013: 2 2018: 2	<p>Such provisions exist including in Ministerial Order No 0222/A/MINEF of 25 May 2001 establishing the modalities for the development and implementation of management plans. On the basis of the social impact studies and post-allocation consultations that normally are part of the development of management plans, concessions are to be zoned taking into account the various use rights that can be exerted.</p> <p>Design: The result of a joint effort from the ministries in charge of forests, the territorial administration and finance. Joint Ministerial Order No 00076/MINATD/MINFI/MINFOF of 26 June 2012 sets out the terms of benefit-sharing arrangements for the benefit of local communities which include: (i) the share of forest revenue to be allocated to the communities concerned and (ii) the responsibilities of concession holders in terms of local development and infrastructure.</p> <p>Implementation: Such measures are meant to provide forest-based livelihood opportunities for communities but implementation and enforcement has been fairly poor so far.</p>

¹³ World Wide Fund for Nature, Centre for Environment and Development & German Society for International Cooperation (undated), *Operational Guidelines for obtaining Free, Prior and Informed Consent in REDD+ initiatives in Cameroon*, http://www.cedcameroun.org/wp-content/uploads/2015/01/062014_Cameroon-National-FPIC-Guidelines_EN.pdf

Regulating Demand

Legislation & regulations on illegally sourced timber	Does policy exist? (0-2)	Quality of design (1-5)	Level of implementation (1-5)	Justification or additional qualitative explanation
9. Does the country have adequate legislation and regulations in place to prevent illegally sourced timber from being imported or sold?				
<i>a. Has the country analysed its existing legislation and regulations on preventing imports and sales of illegally sourced timber? (Question added in 2018)</i>	2009: - 2013: - 2018: 2	2009: - 2013: - 2018: 3		<p>Art. 5(3) of the VPA specifies that no FLEGT licenses will be issued 'for any timber and derived products that are composed of, or include, timber and derived products imported into Cameroon from a third country in a form in which export is prohibited under the laws of the country concerned or for which there is proof that this timber and these timber and derived products have been produced or acquired in violation of the laws of the country where the trees were harvested'. Art. 8(3) of the VPA also states that 'Cameroon shall verify the legality of the timber and derived products exported to markets outside the Union and sold on the internal markets and of imported timber and derived products'.</p> <p>The existing legislation has been analysed as part of the VPA negotiation and implementation and additional regulations have been enacted to reflect this. (See also below).</p>
<i>b. Has additional legislation been enacted and regulations put in place to prevent illegally sourced timber from being imported or sold?</i>	2009: 1 2013: 1 2018: 2	2009: n/a 2013: n/a 2018: 3	2009: n/a 2013: n/a 2018: 1	<p>Annex III-A (VI) of the Cameroon-EU VPA states that verification of timber supply chains covers 'all forestry products exported, imported, in transit and exchanged within the country'. Annex III-A (II) also provides that the TLAS shall supply 'to all sources of production or acquisition of timber and timber products circulating within the national territory'. Annex III-A (II) further states that 'timber imported by forestry entities established in Cameroon will continue to be imported subject to the conditions laid down in the Cameroon legislation and regulations'. Monitoring the domestic timber market is among the supporting measures called for during implementation of the VPA.</p> <p>Ministerial Order N°002 of 7 February 2013, providing for the entry into force of the SIGIF (Computerized Forest Information Management System), sets out the management of imported and transit timber as well as traceability requirements.</p> <p>Implementation: Inspections are carried out at road check points on a systematic basis but their consistency and thoroughness is irregular. There have been suspected cases of imported timber being laundered as domestic timber, and conversely, illegally-harvested domestic timber being disguised as transit timber.</p>
<i>c. If there is legislation in place to prevent the import of illegal timber, how broad is the product scope of this legislation? (Question added in 2018)</i>		2009: - 2013: - 2018: 3		<p>Annex I-A of the VPA lists the products subject to FLEGT licensing. The list includes wood in the rough, processed timber products (e.g. sawnwood, veneer sheets, plywood), tools and tool handles and several types of furniture. Paper and charcoal are not covered and neither are some processed products such as joinery and mouldings.</p>
<i>d. If there is legislation in place to prevent the import of illegal timber, does it apply only to importers & those that are first place on the market or to all those along the supply chain? (Question added in 2018)</i>		2009: - 2013: - 2018: 4		<p>As per the VPA, 'the LAS applies to all sources of production or acquisition of timber and timber products circulating within the national territory.' As per Art. 22 of Ministerial Order N°002 of 7 February 2013, providing for the entry into force of the SIGIF, 'all timber products circulating throughout the Cameroonian territory must be registered onto the SIGIF'. This includes both imported timber and timber in transit. As such, the whole supply chain is covered by the legislation in place.</p>

Legislation & regulations on illegally sourced timber	Does policy exist? (0-2)	Quality of design (1-5)	Level of implementation (1-5)	Justification or additional qualitative explanation
<p><i>e. If there is legislation in place to prevent the import of illegal timber, does it include a requirement on businesses to implement due diligence?</i> (Question added in 2018)</p>		<p>2009: - 2013: - 2018: 1</p>		<p>No such requirement is in place even though due diligence has become a more common practice among those companies whose products are destined for the European market (in order to meet the European Union Timber Regulation requirements).</p>
<p><i>f. Is implementation of the policy systematically monitored and assessed?</i> (Question added in 2018)</p>		<p>2009: - 2013: - 2018: 3</p>		<p>The VPA includes provisions for an independent audit to be conducted periodically on the entire system once the TLAS is fully operational. One audit was carried out in 2014, with a focus on the processes for title allocation and seized timber. However, the procedures for the independent audit are yet to be developed even though the terms of reference for the independent auditor are specified in Annex VI of the VPA.</p> <p>Implementation: This is expected to remain weak until such time as the TLAS has been fully implemented and rolled out. Civil society-led independent monitoring missions, together with publications on law enforcement in the sector which are to be complemented by the independent audits of the system, have been crucial in identifying key weaknesses in the checks and monitoring carried out by the administration. The VPA committees (Joint Monitoring Committee and National Monitoring Committee) also constitute a framework for monitoring the ministry's commitments in terms of the fight against illegal logging.</p>

Policies & measures to promote demand for legal timber	Does policy exist? (0-2)	Quality of design (1-5)	Level of implementation (1-5)	Justification or additional qualitative explanation
10. Is there a public procurement policy in place excluding illegal and/or unsustainable timber products from government purchasing? (Question added in 2018)	2009: - 2013: - 2018: 1		2009: - 2013: - 2018: n/a	A working group set up in January 2018 upon the decision of MINFOF was tasked with developing a regulatory framework for the promotion and use of legally-sourced timber in public procurement. The draft framework, specifying the procurement modalities, was validated in May 2018 and is now pending approval by the office of the prime minister. ¹⁴
<i>a. What level of adherence does the policy require?</i> (Question added in 2018)		2009: - 2013: - 2018: n/a		The policy is still to be adopted and its terms have not been made publicly available.
<i>b. Does the policy cover all timber products including paper?</i> (Question added in 2018)		2009: - 2013: - 2018: n/a		Same as above.
<i>c. Does the policy rest on independent certification or verification schemes or equivalent for identifying legal products?</i> (Question added in 2018)		2009: - 2013: - 2018: n/a		Same as above.
<i>d. Is assistance offered to government purchasers e.g. advice, guidance, training etc?</i> (Question added in 2018)		2009: - 2013: - 2018: n/a		Same as above.
<i>e. Is implementation of the policy systematically monitored and assessed?</i> (Question added in 2018)		2009: - 2013: - 2018: n/a		Same as above.
<i>f. Does the procurement policy apply to sub-national (provincial, regional, local) government?</i> (Question added in 2018)		2009: - 2013: - 2018: n/a		Same as above.

¹⁴ Eba'a Atyi, R. (ed.) (2018), *Faire du bois légal une obligation dans les marchés publics en Afrique Centrale*. Central African Forest Observatory Policy Brief https://www.observatoire-comifac.net/docs/policy_brief/OFAC-Brief-01-fr-web.pdf

Policies & measures to promote demand for legal timber	Does policy exist? (0-2)	Quality of design (1-5)	Level of implementation (1-5)	Justification or additional qualitative explanation
11. Do forest-related policies encourage legal timber production and discourage illegal timber production by ensuring that the level of demand does not exceed legal supply?				
<i>a. Does the permitting system for primary wood processing facilities require evidence of sufficient legal sources of raw material?</i>	2009: 1 2013: 1 2018: 1	2009: 2 2013: 2 2018: 2	2009: 1 2013: 1 2018: 1	<p>There are no such provisions regarding access to sufficient raw materials. Nonetheless, Art 115 of Decree No 95/531/PM of 23 August 1995 establishing the modalities of the forest regime, stipulates that: (1) Those owners of processing units who do not have logging rights are allowed to source logs from the local market (2) The forest products thus procured must originate from legally-operated forest concessions and (3) A logbook must be kept to record flows of materials (in and out), as well as the origins, volumes and destinations. Art 130 further stipulates that violations of the decree's provisions may lead to permits being suspended.</p> <p>In addition, in 2015, a series of measures (Decision No N°188/D/MINFOF/SG/DTP/SDTB of 06 May 2015) was taken to facilitate access to legal timber for artisanal operators.</p> <p>In practice, implementation and enforcement have remained weak and occurrences of illegally/informally-harvested timber products entering processing units have remained widespread with the notable exception of certified companies.</p> <p>In principle, the issue should be addressed more consistently once the SIGIF2 is in place as the domestic market will also be included in the TLAS.</p>

Transparency

Institutional & legal transparency	Does policy exist? (0-2)	Quality of design (1-5)	Level of implementation (1-5)	Justification or additional qualitative explanation
<p>12. Is there a unified document which describes the roles, responsibilities and controls for all agencies involved in regulating forest utilization and trade from harvest rights allocation to point of sale or export and is it accessible to the public?</p>	<p>2009: 1 2013: 1 2018: 1</p>	<p>2009: 3 2013: 4 2018: 4</p>	<p>2009: 2 2013: 2 2018: 3</p>	<p>The National Strategy for Forest & Fauna Law Enforcement defines the roles and responsibilities of the different enforcement agencies. The VPA also includes a description of roles and responsibilities of government bodies. However, both documents focus on verification and do not include elements such as timber rights allocation which is otherwise described in specific pieces of legislation.</p> <p>Design: The National Strategy, which dates back to 2005, remains vague on the details of implementing controls e.g. the documents to be checked. The manual for forest guards, developed by AGRECO-CEW (a partnership between Belgian research institute AGRECO and Cameroonian NGO Cameroon Environmental Watch) with reference to the principles and indicators of the VPA legality grid, contains a complementary and useful document because it specifies, for all types of licenses, the basis for undertaking controls and what these should entail.</p>
<p>13. Is there a legal requirement to make forest legislation and regulations readily accessible to the public? <i>(Question added in 2018)</i></p>	<p>2009: - 2013: - 2018: 2</p>	<p>2009: - 2013: - 2018: 3</p>	<p>2009: - 2013: - 2018: 2</p>	<p>Annex VII of the VPA provides for the mandatory and systematic publishing of all relevant legal information, the list of which includes the legality matrices, the texts of all laws and amendments applicable to the forestry sector, the Forest Code and its implementing texts as well as other relevant pieces of legislation (e.g. Employment Code, General Tax code). Such information is to be made available on the websites of both parties.</p> <p>Design: Online resources are accessible to a limited audience and technical difficulties (see below) make availability even more challenging.</p> <p>Implementation: Technical impediments (official websites going down or not being updated on a regular basis), as well as poor communication between the administration and other stakeholders, have led to the latter including those CSOs engaged in independent monitoring initiatives to rely on informal channels rather than official ones to access the relevant information.</p>

Transparency in resource allocation, management & enforcement	Does policy exist? (0-2)	Quality of design (1-5)	Level of implementation (1-5)	Justification or additional qualitative explanation
14. Do policies, laws or regulations contain provisions designed to ensure that resource allocation and management is carried out transparently?				
<i>a. Do policies, laws or regulations stipulate that rules for resource allocation processes e.g. concession allocation and competitions are made publicly available?</i>	2009: 2 2013: 2 2018: 2		2009: 3 2013: 3 2018: 4	<p>Art 51(2) of Decree No 95/531/PM lists the information to be made available in the tender notice namely: location, boundaries, ground area, harvest potential and social commitments with respect to neighbouring communities. Decree No 95/531 provides the general rules for the allocation of logging rights.</p> <p>Concession allocations are also subject to the conditions established by Decree No 2004-275 of 24 September 2004 governing public procurement according to which the specific rules of tendering processes are to be accessed in a 'tender dossier' upon payment of a defined fee. This, notwithstanding, it is the opinion of stakeholders that such a requirement does not diminish the transparency of the tendering process as the information enclosed in the 'dossier' consists of technical specifications.</p> <p>Implementation: The notices are mostly advertized through billposting or more occasionally via other media (i.e. radio and newspapers and the MINFOF website).</p>
<i>b. Do policies, laws or regulations stipulate that dates for when resource allocation processes are to be held are made publicly available?</i>	2009: 2 2013: 2 2018: 2	2009: 5 2013: 5 2018: 5	2009: 4 2013: 4 2018: 4	<p>Art 51 of Decree No 95/531/PM (see above) states that calls for tender must be advertized for a period of 45 days therefore implying that the dates should be included.</p> <p>Implementation: In practice, the notices do specify the tender closing dates.</p>
<i>c. Do policies, laws or regulations stipulate that the results of resource allocation processes are made publicly available e.g. bids and awards for concession allocation and competitions?</i>	2009: 2 2013: 2 2018: 2	2009: 5 2013: 5 2018: 5	2009: 3 2013: 3 2018: 3	<p>Annex VII of the VPA requires that the results of the Inter-Ministerial Commission on logging permit allocations be made public.</p> <p>Design: The VPA provides for this information to be published automatically.</p> <p>Implementation: Results are always made public by way of communiqués that are bill-posted at the ministry. Dissemination is rarely wider than this although a few cases of such results are to be found on the VPA website. The information provided in the communiqués mostly consists of a list of successful candidates. The reports, which include details regarding the technical and financial offers, the number of offers examined and the scores awarded, are not disclosed. Only applicants can obtain relevant information regarding their selection or non-selection.¹⁵</p>

¹⁵ VPA website - Information to be made public, see: <http://apvcameroun.cm/index.php/informations-rendues-publiques>

Transparency in resource allocation, management & enforcement	Does policy exist? (0-2)	Quality of design (1-5)	Level of implementation (1-5)	Justification or additional qualitative explanation
<i>d. Do policies, laws or regulations stipulate that up to date summary data is published on harvesting, processing and international trade?</i>	2009: 0 2013: 2 2018: 2	2009: n/a 2013: 5 2018: 5	2009: 2 2013: 2 2018: 3	<p>This requirement is not stated in any national regulations but the VPA (Annex VII) does include provisions for such information to be published automatically.</p> <p>To date, the information made available on the VPA website is either incomplete, outdated or missing for the following elements:</p> <ul style="list-style-type: none"> Total annual log production (Outdated) Annual authorized logging volumes by species, title and company (Outdated) Annual volumes of logs exported by species (total and to the Union) (Outdated) Annual volumes processed by type of product, species and company (Missing)- Annual volumes of timber and derived products imported into Cameroon and by country (Missing)¹⁶ <p>However, MINFOF publications do provide relevant data. For instance, a document entitled 'Facts and Figures' is published each year which provides up-to-date information on the volumes harvested, processed and exported. The latest issue (December 2017) has been made available on the website of the Congo Basin Forest Partnership. Other publications include the Annual Statistical Report and 'La Lettre Verte'. The latter is circulated twice a year to provide stakeholders with statistics on the sector although its posting on the MINFOF website has been irregular. The information covered in these publications can also be accessed on request at the MINFOF. This, notwithstanding, the information is not always up-to-date. VPA annual reports also include this data. In 2016, a MINFOF Center for International Forestry Research (CIFOR)-UN Food and Agriculture Organization report analysed information on the forest sector (until 2015) for easy access by the public.¹⁷</p>

15. Do policies, laws or regulations contain provisions designed to ensure transparency in concession use?

<i>a. Do policies, laws or regulations stipulate that information on location of concessions, ownership and contact details is publicly available?</i>	2009: 2 2013: 2 2018: 2	2009: 3 2013: 3 2018: 3	2009: 3 2013: 3 2018: 3	<p>The 1994 Forestry Law does not specifically provide that information on location of concessions, ownership and contacts should be made publicly available. However, the VPA (Annex VII) states that a 'List of valid titles, with names of the companies to whom they have been allocated' has to be made public along with a location map of valid logging titles.</p> <p>Design: As per the VPA the publication is meant to be automatic.</p> <p>Implementation: The information can be accessed on request at the ministry but with some difficulties. Some information on location and ownership has been made available through other channels. Recently uploaded lists can be accessed on the VPA-dedicated website. It should be noted that the information on location is vague (area name only) and contact details are not included.¹⁸</p> <p>Both the MINFOF and the VPA websites provide a link to the interactive Forest Atlas, developed by the World Resources Institute using a MINFOF-run database. The Atlas provides information on the location of concessions (among other information such as concession area, allocation date or management plan status and ownership but no contact details. The interactive atlas is still being updated on a regular basis. However, being an online resource, it is not readily accessible to local people even though the latter aspect will improve given current progress with internet access.¹⁹</p>
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¹⁶ VPA website - Information to be made public, see: <http://apycameroun.cm/index.php/informations-rendues-publiques>

¹⁷ MINFOF (2017), *Secteur Forestier et Faunique du Cameroun: Faits et Chiffres*, <http://pfbc-cbfp.org/actualites/items/Faits-chiffres.html?file=docs/news/Dec%202017/Faits%20%26%20Chiffres%20DEC%202017%20comprese%CC%81.pdf> MINFOF website: <http://www.minfof.cm>

¹⁸ VPA website - Information to be made public, see: <http://apycameroun.cm/index.php/informations-rendues-publiques>

¹⁹ MINFOF & WRI, 'Forest Atlas of the Republic of Cameroon', <https://cmr.forest-atlas.org/map>

Transparency in resource allocation, management & enforcement	Does policy exist? (0-2)	Quality of design (1-5)	Level of implementation (1-5)	Justification or additional qualitative explanation
<i>b. Do policies, laws or regulations stipulate that information on concession contracts, inventories and plans are publicly available i.e. long term and annual forest management and harvest plans?</i>	2009: 0 2013: 2 2018: 2	2009: n/a 2013: 3 2018: 3	2009: 2 2013: 2 2018: 3	<p>Existing Policy: No such requirements exist regarding concession contracts although inventories and management plans are under the scope of Annex VII of the VPA. Among other information, the annex stipulates that the following elements have to be made public some of which are readily available on either or both of the MINFOF and VPA websites:²⁰</p> <ul style="list-style-type: none"> List of annual operating permits/annual logging certificates issued (Available and up-to-date.) List of concessions under management (Available but not up-to-date.) Area of forestry concessions with approved management plan (Available and up-to-date.) Area of forestry concessions involved in management including annual operating plans and five year management plans– (Not available.) Documents relating to approved management plans (Documents available for 11 forest concessions only out of 115 UFAs including 106 allocated concessions – 104 of which have an approved management plan.) <p>In 2013, it was noted that a website had been set up by MINFOF and GIZ, containing up to 3,000 documents including concession contracts, inventories and management plans. This is no longer accessible although some of this information can be accessed through the various documents gathered on the Interactive Forest Atlas.</p> <p>At the level of the MINFOF, access to information can be difficult.</p>
<i>c. Do policies, laws or regulations stipulate that results of environmental and social impact assessments and mitigation measures are publicly available?</i>	2009: 2 2013: 2 2018: 2	2009: 5 2013: 5 2018: 5	2009: 2 2013: 2 2018: 2	<p>Art 11 of Decree No 2005/0577/PM of 2005 on the conduct of EIAs (which include socio-economic aspects) requires the undertaking of public hearings and consultations as part of such studies including for the dissemination of the findings which, if need be, can be challenged by the communities concerned. The VPA also requires that EIA studies be made available automatically.</p> <p>Implementation: Some documents have been made public on the VPA website but only for a limited number of concessions and with information dating back to 2008 at the latest. In practice, access to the validated results of such studies is difficult at the level of the ministry in charge of the environment on grounds of the alleged confidentiality of their content.²¹</p>
16. Do policies, laws or regulations contain provisions designed to ensure that information on enforcement activities is publicly available?				
<i>a. Do policies, laws or regulations stipulate that data is published on forest crimes including success rates on detection, interdiction, prosecution and conviction including fines levied and fines paid and volumes seized?</i>	2009: 0 2013: 2 2018: 2	2009: n/a 2013: 5 2018: 5	2009: 3 2013: 3 2018: 3	<p>The forest legislation does not provide for this but mention is made in the National Strategy on Forests and Wildlife. Most importantly, Annex VII of the VPA makes publication of the list of forest disputes an obligation together with that of fines levied and paid.</p> <p>Implementation: The corresponding documents on the VPA website are either outdated or missing. Records of offences (now called 'Records of Disputes') started being published online by MINFOF in 2012, but in recent years, the consistency of publication has decreased although the records are being kept up-to-date at the level of the ministry and are available on request.²²</p>

²⁰ VPA website - Information to be made public, see: <http://apvcameroun.cm/index.php/informations-rendues-publiques> MINFOF & WRI, 'Forest Atlas of the Republic of Cameroon', <https://cmr.forest-atlas.org/map>

²¹ VPA website - Information to be made public, see: <http://apvcameroun.cm/index.php/informations-rendues-publiques>

²² VPA website - Information to be made public: <http://apvcameroun.cm/index.php/informations-rendues-publiques>

Transparency in resource allocation, management & enforcement	Does policy exist? (0-2)	Quality of design (1-5)	Level of implementation (1-5)	Justification or additional qualitative explanation
<i>b. Do policies, laws and regulations stipulate that information on disposals of confiscated wood or results of public auctions of confiscated wood or other kinds of public bidding are publicly available?</i>	2009: 0 2013: 2 2018: 2	2009: n/a 2013: 3 2018: 5	2009: 2 2013: 2 2018: 2	<p>Circular Letter No 0081 /LC/MINFOF/CAB of 31 May 2018, setting out the procedures for public auctions of confiscated wood, provides that auctions must be advertised through a broadly disseminated call for tenders although the channels to be used are not specified. In addition, the VPA (Annex VII) requires that the annual volumes of timber sold at public auctions be made publicly available.</p> <p>Implementation: Information can be accessed on the VPA-website but it is not being regularly updated. The results can be accessed at the MINFOF on written request but the request can be refused. There have also been alleged cases of 'fake' auctions being organized as a means to launder timber products. As a result, a Ministerial Decision (No 500/ D/MINFOF/ Cab) was taken in September 2017 to suspend auctions of seized timber until further notice.</p>

Information & data management	Does policy exist? (0-2)	Quality of design (1-5)	Level of implementation (1-5)	Justification or additional qualitative explanation
<p>17. Is there an up-to-date, accurate information management system in place through which relevant government agencies can access data related to forest enforcement and management?</p> <p><i>This information management system could include elements such as forest inventories, remote sensing imagery and harvest permits and licenses, forest management plans, centralized repository of maps, transportation documents and processing licenses and records.</i></p>	<p>2009: 2 2013: 2 2018: 2</p>	<p>2009: 2 2013: 2 2018: 2</p>	<p>2009: 1 2013: 1 2018: 2</p>	<p>Until SIGIF2 comes into being, the Computerized Forest Information Management System in place is still SIGIF. Used by the MINFOF, it is also possibly accessed by the Ministry of Finance for the monitoring of fiscal aspects but customs do not use it.</p> <p>Design: The system mostly focusses on harvesting, tracking and related data.</p> <p>Implementation: The system is not automated and requires manual input of data which results in inaccuracies and delays.</p>
<p>18. Is there an up-to-date, accurate information system in place to gather data on employment in the forest sector? (Question added in 2018)</p>	<p>2009: - 2013: - 2018: 0</p>	<p>2009: - 2013: - 2018: n/a</p>	<p>2009: - 2013: - 2018: n/a</p>	<p>There is no up-to-date system for gathering data on the sector nor with respect to employment in the sector. The forestry administration seems to rely on outdated data.</p> <p>The National Statistical Institute is tasked with producing statistics that are relevant to the country's social and economic governance. No information specific to forest sector employment could be found on the institute's website. According to the 2017 issue of MINFOF's yearly statistical summary ('Facts and Figures'), the most recent data available from the National Statistical Institute date back to 2008 (with an estimated 7,766 workers in 55 enterprises of the formal sector and 20,681 in the informal sector). These figures come in stark contrast to the findings of a CIFOR-conducted study (2013) which reported an estimated 21,902 jobs in the formal sector and 44,000 people engaged in informal chainsaw milling.²³</p>

²³ MINFOF (2017),... *Secteur Forestier et Faunique du Cameroun: Faits et Chiffres*, <http://pfbc-cbfp.org/actualites/items/Faits-chiffres.html?file=docs/news/Dec%202017/Faits%20%26%20Chiffres%20DEC%202017%20comprese%CC%81.pdf> Lescuyer, G., Ngouhou Poufoun, J. and Eba'a Atyi, R. (undated), 'CIFOR – MINFOF : Étude de l'importance économique et sociale du secteur forestier et faunique au Cameroun', <https://pfbc-cbfp.org/actualites/items/CIFOR-etude-socio-%C3%A9conomique-new-fr.html?file=docs/news/mars-avril-14/EEF-Etude%20importance%20economique%20du%20secteur%20foret-faune%20au%20Cameroun.pdf>

Financial management	Does policy exist? (0-2)	Quality of design (1-5)	Level of implementation (1-5)	Justification or additional qualitative explanation
19. Is there an effective financial management system in place for the forest sector?				
<i>a. Does the forest administration have a system for monitoring revenue collected from utilization of forest resources against revenue owed as well as a procedure for investigating discrepancies?</i>	2009: 2 2013: 2 2018: 2	2009: 3 2013: 3 2018: 3	2009: 3 2013: 3 2018: 2	<p>The Forest Revenue Security Programme (PSRF) is the system for coordinating the collection and redistribution of forest revenue and bridging the work of MINFOF, on the one hand, and that of the Ministry of Finance (MINFI) on the other. Redistribution is governed by Joint Ministerial Order No 00076/MINATD/MINFI/MINFOF of 26 June 2012 which regulates the use of forest revenue as part of a joint effort by MINFOF, the Ministry of Finance and the Ministry of Land Administration to allocate a portion of forest revenue to local communities and communes.</p> <p>Design: The PSRF encompasses all types of forest revenue but responsibilities remain strictly separate. For example, while recovery notices are sent out by the MINFOF, the MINFI has responsibility for collecting the amounts due with responsibilities further broken down into several MINFI directorates. As a result, the information is scattered. There is no system in place to investigate discrepancies.</p> <p>Implementation: Comparison of different sources of financial data reveal persistent discrepancies including between the MINFOF reports and those of MINFI. Reconciliation of these discrepancies should be done once SIGIF2 is operational.</p>
<i>b. Is there an audit of the forest administration whose findings are publicly available?</i>	2009: 2 2013: 2 2018: 2	2009: 3 2013: 3 2018: 3	2009: 2 2013: 2 2018: 2	<p>There are procedures in place for an administrative and judiciary audit to monitor forest revenue which is supervised by the Ministry of the Supreme State Audit, the Court of Auditors, the National Anti-Corruption Commission (CONAC) and audit services of the Ministry of Finance. The audits cover nearly all aspects of MINFOF financial management but each audit is carried out targeting a specific issue. There is no set interval for the conduct of audits and the results are not made public.</p> <p>There are also internal audits conducted by the Inspectorate General of MINFOF but the results are not published.</p>
20. Does the country report on its forest sector to the EITI? (Question added in 2018)	2009: - 2013: - 2018: 0		2009: - 2013: - 2018: n/a	<p>Cameroon joined the Extractive Industries Transparency Initiative in 2007. Some stakeholders have advocated for the inclusion of the forest sector in the country's reporting but this has not yet been decided on.</p>

Rule of Law

Checks and balances	Does policy exist? (0-2)	Quality of design (1-5)	Level of implementation (1-5)	Justification or additional qualitative explanation
21. Are mechanisms (checks and balances) in place to ensure government fully applies forest law and regulations?				
<i>a. Does the law make provisions for protecting the rights of the public to mount legal challenges against forest management decisions/practices and failure by the government to apply forest law?</i>	2009: 2 2013: 2 2018: 2		2009: 2 2013: 2 2018: 3	<p>Several options exist for the general public to mount legal challenges against forest management decisions:</p> <ul style="list-style-type: none"> As part of the process of forest classification, local communities can lodge complaints (Decree No 95/531/PM of 23 August 1995 establishing the modalities of the forest regime). Appealing administrative decisions on grounds of abuse of power (general regime for the settling of administrative disputes). Art 8(3) of Law No 96/12 of 05 August 1996 governing the management of the environment, states that accredited associations and communities can file civil cases on grounds of breaches of the said law and implementing texts with a detrimental effect on the environment. <p>Implementation: Although these means of recourse have remained under used, because they are insufficiently advertized, recent objections to the classification of forests (Ngwei in the Littoral Region and Messamena in the East) have provided clear examples of how pressure can be successfully applied to influence government decisions.</p>
<i>b. Does the law stipulate penalties for staff for corruption?</i>	2009: 2 2013: 2 2018: 2	2009: 3 2013: 3 2018: 3	2009: 1 2013: 1 2018: 2	<p>While the 1994 Forest Law provides a list of sanctions applicable to violations of the forest legislation, there is no specific mention of sanctions against civil servants who act illegally. Art 153 only states that the administrations in charge of forests are in civil law responsible for the actions of their staff. However, several articles of the Penal Code (i.e. Art 134, 137, 161, 184) do describe the nature of corruption-related offences and the corresponding fines and sentences. Besides, an internal code of conduct and applicable sanctions is in force within MINFOF.</p> <p>Design: The Penal Code establishes the maximum fine for corruption at 2m FCFA and prison sentences of up to 10 years (extendable to life imprisonment in the case of aggravated misappropriation). Such provisions seem to be reasonably dissuasive on paper.</p> <p>Recent developments: In practice, sanctions tend to be benign. From 2015-17, several forestry officials were sanctioned for corruption. However, the disciplinary decisions that ensued made no explicit mention of corruption as being the motive. For instance, five MINFOF officers – including three middle managers and two departmental managers – were suspended in 2016 on grounds of 'deceitfulness and serious neglect of professional duty'.</p>
<i>c. Does the law include clear limits to the power of forest ministers or equivalent or other senior government officials to override forest-related laws, regulations and procedures e.g. concession allocation procedures? Does the law limit discretionary powers?</i>	2009: 2 2013: 2 2018: 2		2009: 2 2013: 2 2018: 3	<p>The law sets some limits on the discretionary powers of senior government officials. As noted in the 2008 assessment, Art 47 of the 1994 Forest Law gives authority to the National Commission to allocate forest concessions and so the minister of forests or high-ranking civil servants do not have discretionary power at this level. However, for individual/personal permits and licenses, they do have the power to allocate these in a discretionary manner (Art 57; 58). Decree No 2005/099 related to the organization of the Ministry of Forestry and Wildlife defines the role of the minister and other top-ranking staff.</p> <p>The research carried out as part of this assessment found no documented examples of such discretionary practices in recent years.</p>

Checks and balances	Does policy exist? (0-2)	Quality of design (1-5)	Level of implementation (1-5)	Justification or additional qualitative explanation
<i>d. Does a parliamentary committee, or equivalent, have formal oversight over the national government forest service and associated agencies?</i>	2009: 2 2013: 2 2018: 2	2009: 4 2013: 4 2018: 4	2009: 4 2013: 2 2018: 3	<p>While the parliament oversees government activities, there is no formal parliamentarian committee in charge of monitoring the activities of the ministry in charge of forests or related government agencies.</p> <p>In recent years, there have been several occurrences of parliament-government dialogues on forest management (i.e. land tenure and governance) which have translated into acts. In 2015, the parliament challenged the Finance Law according to which communities were not eligible for the distribution of the Annual Forest Royalty. This led to communities being made eligible again.</p>
<i>e. Is there a system in place through which relevant government departments and agencies carry out self-monitoring of their performance and internal corruption investigation. (This could be carried out by an internal or external inspectorate which includes making the findings public.)</i>	2009: 2 2013: 2 2018: 2	2009: 3 2013: 3 2018: 4	2009: 1 2013: 2 2018: 2	<p>In addition to the National Anti-Corruption Commission (CONAC), there is an internal Anti-Corruption Unit (CLC) in the Ministry of Forestry and Wildlife.</p> <p>In 2013, the MINFOF released an 'Honest Officer guidebook' for internal use which summarizes the sanctions applicable to cases of dishonest practices including corruption. In 2014, the CLC developed a policy document for denunciation of corruption within the ministry, encouraging MINFOF officers to report on wrongdoings, as well as guidelines setting out the process of lodging a denunciation. The CLC reports on the management of such denunciations are not available to the public but they feed into the CONAC reports that are published each year.²⁴</p> <p>Implementation: Inspections have been carried out by CONAC and the Ministry of the Supreme State Audit upon denunciations of corruption in the forestry sector thereby leading to punctual and isolated sanctions. Overall, the achievements of both CONAC and the CLC have been found to be below expectations. In 2010, as part of the newly launched National Anti-Corruption Strategy, CONAC introduced the use of a Corruption Perceptions Index for the forest sector. The baseline scoring for 2010 was 7.27/10. While later assessments seemed to indicate some improvement (down to 6.44/10 in 2013, then 5.13/10 in 2014), the trend has deteriorated in recent years (reaching 7.25/10 again in 2017). It should be noted that the four latest assessments (2013, 2014, 2015, 2017) were carried out by a CSO, Forests and Rural Development (FODER), and not by CONAC itself.²⁵</p>
<i>f. Is there an independent national forest monitoring system in place?</i>	2009: 2 2013: 2 2018: 2	2009: 4 2013: 4 2018: 4	2009: 4 2013: 2 2018: 3	<p>Independent forest monitoring IFMin Cameroon has a long history. Non-mandated, civil society-led forest monitoring activities started being carried out as early as the 1990s. IFM projects were also implemented successively by Global Witness (2000-05), Resource Extraction Monitoring (2006-09), and AGRECO-CEW (2010-13).</p> <p>While there has been no mandated observation in Cameroon since 2013, activities have continued in the form of non-mandated forest monitoring conducted by a network of national CSOs. In 2015, this civil-society independent forest monitoring network developed a harmonized approach to monitoring – the Standardized External Independent Monitoring System (SNOIE) – so as to ensure consistency in the methodology across the various CSOs involved and to enhance reporting and follow-up with enforcement authorities. The SNOIE is now ISO 9001:2015 certified. 27 reports have been produced so far under the SNOIE – most of which have been made publicly available on the network's website.²⁶</p> <p>While being non-mandated, the network is recognized by the MINFOF as a key element in the monitoring of illegalities. The network has established a good working relationship with the authorities in charge of enforcement (National Control Brigade, BNC) resulting in a number of actions being taken by the BNC upon cases reported by the monitors (see 26 (b)). However, follow-up from the government still needs improving, for example, with respect to enforcement of sanctions.</p>
22. Is customs specifically mandated to check that timber consignments meet the country's forestry-specific legal export requirements?	2009: 2 2013: 2 2018: 2		2009: 3 2013: 3 2018: 3	<p>Customs have the formal mandate to control the flow of timber at all ports of entry to and exit from the country with the support of the company Société Générale de Surveillance (SGS) as an external expert. However, they cannot control all aspects of legality and they mainly check that taxes have been paid e.g. in spite of the ministerial ban, Bubinga continues to be exported.</p> <p>COMCAM (Customs database) export figures are also not reliable e.g. they do not capture data from the port of Kribi.</p>

²⁴ MINFOF, *Policy Document on Denunciations and Complaints on Corruption and Related Offences at the Ministry of Forests and Wildlife*, <http://www.minfof.cm/doc/Politique-denonciation-MINFOF.pdf> and MINFOF, (2014), *Guidelines for Denunciations and Complaints on Corruption*, <http://www.minfof.cm/doc/Guide-denonciations-plaintes-MINFOF.pdf>

²⁵ FODER, (2017), *Systematization of Corruption in the Forests and Wildlife Sector in Cameroon, Failed effort to promote good governance?*

²⁶ OIE reports, see: <http://oie-cameroun.org/index.php/synthese-des-denonciations>

Timber tracking & chain of custody	Does policy exist? (0-2)	Quality of design (1-5)	Level of implementation (1-5)	Justification or additional qualitative explanation
23. Are there effective mechanisms in place to detect instances of illegal timber entering the supply chain?				
<i>a. Is there a system in place designed to verify the origin of timber i.e. forest management unit in transport, transfer and delivery?</i>	2009: 2 2013: 2 2018: 2	2009: 3 2013: 3 2018: 3	2009: 2 2013: 2 2018: 2	<p>The development and operationalization of the TLAS – a central requirement in the FLEGT VPA process – has been hampered so far by the slow progress made with developing the Computerized Forest Information Management System (SIGIF2).</p> <p>In areas where timber companies are operating, officers of MINFOF and the Forest Revenue Security Program (PSRF) are tasked with ensuring that outgoing timber has a legal source and that the operator has paid all related charges. There are also MINFOF checkpoints on all roads leading to the main exit roads. In addition to ensuring that timber is from a legal source, the officers also check compliance with management plan requirements such as not transporting bushmeat from poaching. Although it is a well-designed system, it has been rendered inefficient by corruption and staff shortages. A further challenge for PSRF is that its remit overlaps with that of other departments within the Directorate General of Taxation.</p> <p>To mitigate these shortcomings, a number of logging operators have developed their own due diligence/tracking systems to enable customers to trace their products all along the supply chain.</p>
<i>b. Does the system design include the following components?</i>				
<i>i. Independent monitoring procedures by independent government body or third party?</i>	2009: 2 2013: 2 2018: 2	2009: 4 2013: 4 2018: 4	2009: 4 2013: 2 2018: 3	<p>A civil society network carries out non-mandated independent monitoring. (For more information on independent monitoring, see above.)</p> <p>A third-party audit system is to be established for the TLAS, but due to the slow progress in the development of the TLAS, the audit system is yet to come into being.</p>
<i>ii. Reconciliation systems</i>	2009: 0 2013: 1 2018: 1	2009: n/a 2013: 2 2018: 2	2009: n/a 2013: 2 2018: 2	<p>A tracking system (SIGIF) has been in place since 1996/7 at MINFOF and the PSRF. The data should allow each stakeholder to determine the legality of timber but it is not reliable. Some operations are still carried out manually. As a result, some MINFOF unit heads do not even have accurate data about valid permits, that is, those who have the right to operate. Similarly, data from the PSRF are not always forwarded to the decentralized agencies of MINFOF, and vice versa, therefore making it difficult for everyone to conduct effective follow-up.</p>
<i>iii. Tamper-resistant documentation procedures</i>	2009: 2 2013: 2 2018: 2	2009: 3 2013: 3 2018: 3	2009: 2 2013: 2 2018: 2	<p>Procedures exist but these are little known especially at the local level. In fact, there is a gap between decentralized and central services. In terms of timber tracking, a bar code system is still to be developed and implemented.</p>
<i>iv. Computerized systems</i>	2009: 2 2013: 2 2018: 2	2009: 3 2013: 3 2018: 3	2009: 2 2013: 2 2018: 2	<p>The current Computerized Forest Information Management System (SIGIF) is slow, unreliable and not very transparent.</p> <p>The development of a second-generation system (SIGIF2) has been significantly delayed (it was initially expected to be functional by 2013). Discussions at the 11th CCS meeting in 2017 revealed that out of 18 modules, five modules were found to be in a good state of completion (i.e. above 90 per cent).</p>
<i>c. Does the system also cover timber for the domestic market as compared to systems explicitly targeting exports? (Question added in 2018)</i>	2009: - 2013: - 2018: 2	2009: - 2013: - 2018: 3	2009: - 2013: - 2018: 2	<p>The domestic market is covered by the VPA and TLAS. A dedicated application for the domestic market has been developed and is to be built into the SIGIF2. However, the system has not been fully implemented and rolled out. Efforts made by the government in this area (including pilot projects designed to ensure legal supply for the domestic market) have had limited impact.</p>

Law enforcement	Does policy exist? (0-2)	Quality of design (1-5)	Level of implementation (1-5)	Justification or additional qualitative explanation
24. Do policies, laws, regulations and procedures facilitate and promote effective law enforcement?				
<i>a. Are penalties and sanctions against illegal logging and forest-related crime proportionate and dissuasive?</i>				
<i>i. For legislation on domestic production and trade</i>		2009: 3 2013: 3 2018: 3	2009: 2 2013: 2 2018: 3	<p>Design: Penalties and sanctions as defined in the law are deemed reasonably dissuasive but weak implementation is a challenge.</p> <p>Implementation: In practice, the widespread use of 'transactions' in settling breaches (instead of fines and prosecutions), as well as the use of 'amicable' arrangements, has long jeopardized the impact of sanctions. However, recent years have seen a surge in the number and magnitude of enforcement actions thereby leading to stronger sanctions being applied including prison sentences. In 2016-17, the authorities suspended or revoked an unprecedented number (i.e. 63) of harvesting and processing licenses on the grounds of non-compliance. This surge is partly attributable to the authorities taking greater account of denunciations by CSOs and local communities.²⁷</p>
<i>ii. For legislation to prevent the import of illegal timber if in place</i>		2009: - 2013: - 2018: 3	2009: - 2013: - 2018: 3	<p>The penalty regime applicable to this area is no different from the general framework applicable to forest offences as provided for in the 1994 Forest Code (Chap. III) and subsequent regulations. Penalties and sanctions are deemed reasonably dissuasive but implementation is a challenge especially because of the widespread use of transactions (or amicable settlements) at the expense of proper fines and convictions.</p>
<i>b. Are there systems in place to ensure coordination between relevant ministries and agencies on illegal logging cases?</i>	2009: 1 2013: 1 2018: 1	2009: 2 2013: 2 2018: 2	2009: 1 2013: 1 2018: 2	<p>The Penal Code provides the overarching framework for cross-sectoral coordination on illegal logging cases.</p> <p>Design: Several ministries are in principle concerned with illegal logging including, besides the ministry in charge of forests itself, the ministries in charge of the environment, labour, agriculture, finance, justice, health as well as law enforcement. In practice, most coordination actions result from joint efforts by the MINFOF, the Ministry of Justice, and the enforcement agencies.</p> <p>Implementation: Although recent years have seen a number of coordinated enforcement actions, the mechanism in place still lacks broad engagement of all ministries and agencies concerned.</p>

²⁷ FODER (2018), *Annual Report 2017*, <http://forest4dev.org/foder/download/498/>; Examples of actions being taken by the authorities, see: *Sommier des infractions Mai 017*: https://oiecameroun.org/images/documents/Autres/SOMMIER_MINFOF_MAI_2017.pdf

Law enforcement	Does policy exist? (0-2)	Quality of design (1-5)	Level of implementation (1-5)	Justification or additional qualitative explanation
25. Do government institutions and agencies have sufficient capacity and resources to monitor forest areas and detect and suppress forest crime?				
<i>a. Are forest officials/law enforcement staff sufficiently resourced for monitoring and enforcement? (Relevant resources include budgets, numbers of staff, communications, transport, equipment, salaries as well as training in understanding of regulatory framework and knowledge of techniques for monitoring and enforcement.)</i>	2009: 2 2013: 2 2018: 2	2009: 2 2013: 3 2018: 3		<p>There remains a lack of human resources for forest law enforcement. The 'State of the Congo Basin Forests' in 2006 points to the ratio of one MINFOF official for 176,000 ha of exploitable forests in Cameroon. The National Control Brigade (BNC) currently comprises 12 national inspectors tasked with enforcing the law applicable to forests and wildlife in the whole country. Although the successive independent monitoring projects have provided training/capacity building to MINFOF agents in terms of forest control and law enforcement, structural problems such as low wages and a poor working environment (including corruption, abuse of power etc.) still exist and make effective forest control difficult.</p> <p>Implementation: A consequence of the low level of resources allocated for enforcement is the tendency for local-level authorities to use enforcement as an opportunity for alternative revenues hence the widespread use of 'amicable' settlements. However, there has been a shift in recent years with MINFOF increasing the intensity of inspections carried out by the BNC which reports directly to the ministry.²⁸</p>
<i>b. Are the following non-forest sector officials who are involved in forest enforcement, trained and kept up to date in relevant forest sector issues?</i>				
<i>i. Judges and prosecutors</i>	2009: 2 2013: 2 2018: 2			<p>There is training provided for staff but they are often transferred reducing the impact of the training. Another issue relates to the widespread practice of transactions in resolving violations of the forest law as an alternative to judicial procedures. By preventing a high number of cases from being prosecuted, transactions also make it difficult for judges and prosecutors to be kept informed of forest-related issues and to become used to dealing with these.</p> <p>Since 2017, training has also been provided by the US Embassy. For example, magistrates are being introduced to investigation techniques used by the US Forest Service on forest and environmental crimes.</p>
<i>ii. Customs officials</i>	2009: 2 2013: 2 2018: 2			<p>There is training for staff but they are often transferred to other sectors thereby reducing the impact of the training.</p> <p>A recent example of training, with support from TRAFFIC, took place in 2017. A delegation of Cameroonian customs officers took part in a workshop on combating illegal wildlife trade in China (Shanghai, June 2017), where they were introduced to the World Customs Organization (WCO) training manual.</p> <p>In late 2017, the WCO Timber Trade guidelines (see also above) were finalized following a workshop held in November 2017 in Mbalmayo, Cameroon which brought together customs officers from China, Cameroon and the Republic of Congo as well as CITES authorities. The impact this opportunity has had in practice remains to be determined.</p>

²⁸ FODER (2018), *Annual Report 2017*, <http://forest4dev.org/foder/download/498/>

Law enforcement	Does policy exist? (0-2)	Quality of design (1-5)	Level of implementation (1-5)	Justification or additional qualitative explanation
26. Do government agencies systematically use appropriate information gathering tools in order to identify illegal activities?				
<i>a. Are remote sensing systems used for this purpose such as satellite imagery and/or aerial surveillance?</i>			2009: 1 2013: 1 2018: 1	<p>Currently, only international organizations and national CSOs use such systems.</p> <p>The Interactive Forest Atlas developed by the World Resources Institute (WRI) in collaboration with the ministry in charge of forests, does provide information such as concession boundaries and forest cover change that derives from such systems. However, there is no account of satellite imagery being used by the government to identify illegal logging activities. The government is currently in the process of signing an agreement with WRI regarding the extension of the Open Timber Portal to Cameroon. This online tool – already in place in the Democratic Republic of Congo and the Republic of Congo – could provide new opportunities for identifying illegal activities.</p> <p>CSOs have used tools that enable the mapping of areas with high risks of illegal logging. FODER for instance has used ForestLink technology developed by the Rainforest Foundation UK and Centre for Environment and Development has used Obster technology. Another recent development is an online map developed by Cameroonian Living Earth Foundation and Support Service for Local Development Initiatives which enables the georeferenced reporting of illegal practices.²⁹ However, while these tools do provide information that feeds into the IFM reports and/or can be used to alert the authorities, they have not been taken up by government agencies.³⁰</p>
<i>b. Are in-the-field investigatory tools used for this purpose such as confidential diagnostic surveys, informants and NGOs?</i>			2009: 1 2013: 1 2018: 3	<p>The manual for forest guards, developed under the AGRECO-CEW IFM contract (2010-13) and endorsed by MINFOF, is still being used but its effectiveness cannot be assessed due to limited availability of information.</p> <p>At least eight IFM missions have been jointly conducted with forest enforcement officers since 2015 thereby providing opportunities for sharing investigatory tools and methodologies. On the enforcement side, both alerts sent out by CSOs, communities and informants and the findings of the Independent Monitoring missions are acted upon relatively consistently. Since 2016, the number of cases prosecuted by the BNC on the basis of IFM reports has reportedly increased but figures are yet to be made available (compilation is underway by the CSOs).</p>
<i>c. Are material flow analyses used for this purpose such as wood input/output estimates and comparison of import/export data?</i>			2009: 2 2013: 2 2018: 2	<p>SIGIF and the PSRF undertake material flow analyses but this is often delayed.</p>
<i>d. Are log tracking and check point systems used for this purpose?</i>			2009: 2 2013: 2 2018: 2	<p>The follow-up and tracking system includes checkpoints and documentary tracking but it is not fully computerized therefore making it vulnerable to errors and fraud. Under SIGIF2, a system based on barcodes will be implemented. In the meantime, some companies have started using their own barcode system to ensure traceability of their products thus facilitating the due diligence efforts of their customers.</p>

²⁹ See: <http://www.2s2d.org/maps/#10/3.4234/10.3269>

³⁰ Rainforest Foundation UK (2015), 'Forestlink - Putting the Power to Save Forests in Local Peoples' Hands', 29 Jun. 2015, <https://www.rainforestfoundationuk.org/news/june-2015/forestlink-putting-the-power-to-save-forests-in-local-peoples-hands> and <http://www.bd-obster.org>