

Joint submission by African Conservation Foundation, ALERT (Alliance of Leading Environmental Researchers and Thinkers), Foundation Earth, the Gaia Foundation, Global Witness, Greenpeace, Rainforest Foundation Norway, Roadfree, the WILD foundation

October 2016

Written submission to the *Agence française de développement*

We would like to thank the *Agence française de développement* (AFD) for opening to comment its sectoral position paper on forests under its Horizontal Framework of Intervention on Biodiversity. This document makes clear the significant role the AFD plays as an international donor, both in terms of the financial resources invested (EUR 1.1bn spent between 1999 and 2015), its reach (intervention in 29 countries), and influence (shaping the laws, policies and economic sectors of target countries).

Global Witness wishes to submit comments on one specific area of the paper, namely that relating to promotion of the industrial logging sector in rainforests and its related trade.

Since the beginning of the 1990s, there has been wide recognition of the need to “sustainably manage” tropical forests, considered indispensable for the planet’s climate and the livelihoods of millions of people. With the support of Western donors such as France, tools have been created for “sustainable forest management” (SFM) and been oriented towards industrial logging in the countries of the Congo Basin. SFM slowly transformed itself into “sustainable logging of forests”,¹ thereby promoting the logging industry. France, which had several logging companies operating in the region from the beginning of the 1990s, has been one of the main proponents of this approach.² The AFD’s position paper proposes to maintain this policy.

In order to make logging “sustainable”, the AFD has promoted a tool, developed by Western forestry engineers: the Forest Management Plan (FMP). According to its promoters, an FMP ensures the natural regeneration of a forest, the preservation of biodiversity and the socioeconomic development of the region in question. However, substantial evidence indicates that the FMP cannot mitigate the environmental and social harms caused by the logging industry and that they are not adapted to the governance context of the countries of the Congo Basin.

Threats to the environment and climate

An increasing number of studies show that this form of logging slows down the regeneration of original species. Researchers from the French research institute, CIRAD, have highlighted that: “The selective logging of a small number of tree species, with the systematic felling of all well-formed stems that exceed the legal diameter, will remove a significant proportion of the main mature trees from the forest stand, trees that spread seeds for these species. This may lead to a reduction in the availability of seeds for the natural regeneration of the targeted species. [...] The logging of trees in African tropical forests undoubtedly leads to a modification in the initial forest stand”.³ Logging companies themselves have observed **a clear fall in the availability of their favoured species**. This is the case in Gabon, the world’s first exporter of angouma: “Wood processors in Gabon have difficulty finding good clumps of angouma”.⁴

There are also **wider repercussions on biodiversity**. Tropical forests are “fragile ecosystems, where essential reserves are concentrated in the fauna and the flora, not in the ground like in temperate forests (...). Like many complex structures, they are easily

destabilised”, says scientist Jean-Pierre Pascal.⁵ In 2006 the French biologist Francis Hallé explained: **“Once cut, the primary forest takes between six and eight centuries to recover. A tree that falls drags eight others down with it.** After the death of the pioneers, a second wave of species takes root. However, the diversity is at least half less with conquering species such as the tabebuia, the limba and the angouma. That means we have to wait half a millennium to see the primary species again: *Tieghemella africana*, moabi (African pearwood), tiama and mahogany in Africa”.⁶ For its part, the Food and Agriculture Organization of the United Nations (FAO) has observed that “the installation of infrastructures and logging starting from an inexactly defined threshold is harmful to biodiversity because it fragments the forest and eliminates or puts in peril certain fragile species of flora and fauna, thus reducing the variety and the variability of the organisms.”⁷

Furthermore, several studies show that **logging is a polluting activity** due to the hydrocarbons and chemicals it uses, and to the ‘base camps’ and other temporary accommodation used by its employees, creating waste.⁸ Openings in the forest canopy created by industrial logging also create major changes. By letting the light reach the ground, these openings favour the appearance of new species that belong to secondary forests. They also expose the soil to rain erosion.⁹ The **roads and tracks created by foresters** also have a strong impact on the environment, facilitating the entry of illegal loggers and poachers.¹⁰ One major study of endangered elephant populations in the Congo Basin has shown that the abundance and range of forest elephants are threatened by poaching that is most intense close to roads.¹¹ Elephant presence is negatively affected as far as 50 km away from a road. Logging roads also lead to an increase in the human population which is accompanied by **deforestation for agriculture and pressure on animal and plant life.**¹² In one logging concession in northern Congo, the local population rose by 69%.¹³ “In the Amazon, forests penetrated by roads from selective logging operations are 400% more likely to be deforested than are non-logged forests”, William F. Laurance, a leading forest scientist, wrote in 2009.¹⁴ On average, roads/tracks, wood storage areas and workers’ base camps created by logging companies mean that 20% of the total canopy of the logged forest is lost.¹⁵

In 2014, International Action for Primary Forests, a group of scientists, experts and non-governmental organisations, stated that: “Industrial logging has not proven sustainable in primary forests and in the tropics frequently leads to conversion of forests to agriculture. Even with current best practices, industrial logging is not sustainable in primary forests, causes extensive carbon emissions, significantly reduces biodiversity, decreases ecosystem resilience, degrades water quality and increases risk of fire. In many countries primary forests are illegally logged, poor governance is a serious concern and logging in primary forests provides few local economic benefits. [...] industrial logging is not a conservation strategy for primary forests”.¹⁶ Many studies corroborate these findings.¹⁷ The most recent scientific study on threats to biologically and ecologically intact landscapes finds that:

“Protection of intact forest ecosystems from industrial land uses is particularly important, given that they store more carbon than degraded forests and are more resilient to external perturbations, including climate variability, fire, and illegal logging, poaching, and mining [...] there is a clear need to focus on halting current threatening activities that have been leading to the recent erosion of wilderness areas, including limiting road expansion; preventing industrial mining, forestry, and other large-scale agricultural operations; and enforcing existing legal frameworks considering that half of all tropical forest clearing between 2000 and 2012 was illegal.”¹⁸

The AFD has committed to ensuring that forest management plans would “not lead to the logging of primary forests or ancient or critical habitats” in the context of its projects.¹⁹ In light of this commitment, the AFD should already guarantee that intact forest landscapes are protected from industrial logging.

'Forest management plans' not fit for purpose

Substantial evidence indicates that forest management plans recommended by, among others, the AFD, do not produce the expected outcomes and do not mitigate the negative impacts of industrial logging on the environment. In 2012, a review of the World Bank's policy by its Independent Evaluation Group (IEG) stated that: "A common indicator associated with environmental management in World Bank projects that support industrial timber concession reform is the "adoption of a management plan" or "an increased number of hectares of forest under management plans". IEG has found that this indicator is insufficient to determine whether a concession is being managed in a manner that adequately satisfies agreed environmental rules and guidelines".²⁰

Data on tropical forests, which are extremely complex ecosystems,²¹ is still very patchy.²² There are multiple parameters to consider in order to figure out how forests work and these are still not fully understood: each space evolves differently and over a timescale that is often much longer than the human scale. Scientists have developed certain tools over the last twenty years (computers, genetic analysis, isotopic research, etc.) to study models, although these can "only be based on the data and knowledge available, and a part of their results cannot be verified in the short term".²³ It is not possible, therefore, to know how the Congo Basin rainforest is evolving, or how it will evolve. As a result, it is not possible to "manage (...) them in a sustainable manner".²⁴ A document reviewing the AFD's policy in 2011 noted that: "**Current scientific knowledge does not allow us to guarantee yet that the technical choices made [by the logging industry] (...) will mean the sustainable management of the resource.** The impact of human intervention on a complex natural milieu is far from being understood and the results of research will take several more years to provide all the data required for analysis".²⁵ The most recent research already indicates that selective logging in Central Africa's logging concessions is having long-lasting ecological effects and diminishing the carbon storage capacity of its rainforest.²⁶ We must also now consider the impacts on forest ecology of a rapidly changing climate. Primary forests including intact forest landscapes are more resilient to external perturbations and have greater adaptive capacity compared to logged and fragmented forests.²⁷

The way in which the rules for FMPs are defined is also significant: they are generally set up in such a way that logging companies do not have to change their practices. Some experts cite "**more or less lenient management plans**".²⁸ In Cameroon, for example, the FMPs authorise loggers not to 'manage' species of their choice if their volume does not exceed 75% of the total harvestable volume.²⁹ This means that the species that are felled the most by loggers need not be subject to restrictions.³⁰

Higher levels of deforestation in concessions under FMPs?

Two recent studies conclude that logging concessions in the Republic of Congo managed by European companies – most of them with an FMP – **lead to twice as much deforestation as no-FMP concessions**.³¹ A study in 2014 underlines: "European concessions had the highest rates of total and core deforestation, followed by Asian concessions, indicating that the fragmentation of intact forests in Congo is strongly associated with industrial logging fuelled by foreign capital. European concession holders were also far more likely to comply with SFM policies, followed by Asian concessions, suggesting that compliance with **Sustainable Forest Management policies may not mitigate degradation in tropical production forests**". The reason for this difference seems to lie in the nature of the companies' markets and their logging practices: "Spatial patterns of deforestation indicate that the high rates of forest fragmentation observed in European concessions are associated with road construction for highly selective logging. European markets demand timber from only a few target tree species, and dense road networks are necessary to find those species.

Asian and Congolese markets demand a wider variety of less valuable species. Concessions serving those less selective markets may have higher incentive to harvest more intensively in easily accessible forests, thereby saving money on road construction and maintenance, and avoiding penetration into core forests. European concession holders were far more compliant with SFM policies”.³² The scientists conclude that: “If, as our results suggest, SFM compliance leads to higher production [of timber] and higher deforestation [...], then the growing global demand for sustainably-managed timber may have unexpected and deleterious consequences for tropical forest ecosystems”.³³

Nevertheless, the results of these studies are disputed by a “working document” by a group of practitioners and academics,³⁴ published on a website (whose partners, it is to be noted, are French consultancies responsible for establishing FMPs for logging companies).³⁵ The document concludes:

“Our results show that deforestation is lower in concessions with FMPs than in those without. In a comparative analysis of deforestation with production remaining constant, concessions with FMPs are approximately twice as efficient as those without; per cubic metre produced, gross loss of forests cover was lower by half in concessions with FMPs. We do not argue that forest management planning reduces deforestation because we understand that there are other factors which play essential roles. The dynamics of these other factors need to be analysed, to avoid systematically attributing deforestation trends to forest management plans, or giving them a greater role in than deserved.”

However, a mapping study on deforestation in the Republic of Congo reveals that between 2000 and 2014, Congolese logging concessions certified by the Forest Stewardship Council suffered a total forest loss of 37,093 ha , an area equivalent to approximately 40,000 football fields.³⁶ These different reports indicate that there is an urgent need for independent, scientific research to establish whether sustainable management techniques, promoted by the AFD, could either cause increased deforestation or allow continued deforestation within these forest areas.

Biodiversity and fauna poorly taken into account

As is the case for trees in logging concession areas, biodiversity and wildlife are generally poorly understood. For this reason, they cannot be correctly taken into account by those drawing up FMPs. They often “restrict themselves to making an inventory of large fauna and identifying conservation areas. Other aspects (fauna that are not flagship species, NTFPs [non-timber forest products] and flora) have been neglected”, according to the authors of the 20-year evaluation of AFD’s policy.³⁷ Companies are quite often content to take measures aimed at stopping poaching (setting up controls of access to concessions etc. and preventing local people from cultivating fields in concession areas). In general, no system to study and monitor the evolution of wildlife is put in place.

The logging industry enriches the few, but impoverishes the many

The AFD justifies its support for industrial logging in the Congo Basin by arguing that it can, along with the timber trade, allow producer countries to fight poverty and be a factor of development. Jobs created by the industry and taxes paid to the States would be key to development. But this assertion is not supported by evidence on the ground.

First of all, the logging industry, while covering a large area of forest, makes a weak contribution to the economy, through the payment of forest taxes, which is often lower than that of the informal economy, according to a recent study: “The annual revenues generated by the informal sector in rural economies are estimated at 25 billion CFA Francs in Cameroon, i.e. four times the sum from the annual forest tax distributed locally; 4.1 billion CFA Francs in the Congo, more than the forest tax collected by the State in 2010; 2,2 billion

CFA Francs in Gabon, i.e. three-quarters of the forest tax collected in 2010; and almost 522 million CFA Francs in the CAR [Central African Republic], i.e. more than half of forest taxes.”³⁸

It is also clear that industrial logging revenues have not helped the countries of the Congo Basin progress economically and socially. In fact the contrary effect can be observed. In 1987, FAO senior director of forestry Jack Westoby wrote that: “Over the last two decades, massive tracts of virgin tropical forests have come under exploitation, in all three under-developed regions. **That exploitation, with a few honourable exceptions, has been reckless, wasteful, even devastating.** Nearly all the operations have been enclavistic, that is to say they have had no profound or durable impact on the social and economic life of the countries where they have taken place... Local needs are not being met; the employment opportunities are trifling. A significant part of the exports, as logs or as primary processed timber, is exported within the firm, and transfer values are fixed to facilitate the accumulation of profits outside the country... **The contribution of forestry to improving the lot of the common people has been negligible so far**”.³⁹ Twenty years later, the World Bank, and the research institutes, CIFOR and CIRAD, published a study stating: “Industrial timber production has a poor track record in Africa. Over the past sixty years, there is little evidence that it has lifted rural populations out of poverty or contributed in other meaningful and sustainable ways to local and national development”.⁴⁰

This can be attributed to weak governance, corruption and weak legal compliance, both because of producer country administrations and the logging companies themselves.

In fact, there is very weak political will to enforce laws in the logging sector. In the Republic of Congo, the Independent Observer (CAGDF, FM, REM, 2012) observed several failings on the part of the Forestry Administration, including: “**Low frequency of checks on the ground by forestry officials** (...); a low recovery rate on forestry transactions of 5% in 2012, i.e. a revenue shortfall for the State of 1.4 million euros; a high level of debt in logging companies, with around 6.5 million euros of felling and surface taxes unpaid (...); major failings in the treatment and monitoring of disputes (...); cases of illegal allocation of access rights to forest resources”.⁴¹ Forests Monitor reported the following on Cameroon: “The checks carried out by the authorities are more apparent than formal. For example, in the eastern province, still the biggest forest area after the savage deforestation carried out in the centre of the country, there are few officials and little resources at their disposal. In this province, where European-based logging companies are predominant, there is on average only one government official for every 20,000 hectares of concession”.⁴² The situation is the same in CAR, as officials from the Administration indicated to Global Witness in 2014.⁴³ CAR’s Forest Minister herself explained in 2015 that her ministry only had “six vehicles, of which four were four-wheel drive”.⁴⁴

When companies pay their forest taxes at local level, they are often embezzled by officials and local elites.⁴⁵ In Cameroon, for example, where 10% of forest taxes should be given to local communities neighbouring the concessions, the revenue distribution system put in place by the government,⁴⁶ under pressure from aid donors, “**is failing to provide the expected benefits to the communities it targets: those living adjacent to forest concessions.**”⁴⁷ In CAR, there is a history of money generated by industrial logging not reaching the communities either: the funds from the special purposes account for forest development (the ‘CAS-DF’) have regularly been misappropriated.⁴⁸

In the absence of serious checks, companies commit many infractions, as documented by several studies and surveys.⁴⁹ The fraud takes the form, inter alia of exceeding felling quotas, false declarations, felling outside the concession area or the felling of protected or unauthorised species, the non-payment of taxes due to the State, the violation of the public procurement code and the abuse of rights of workers and local communities. In complicity

with Administration officials, a vast system of corruption has developed, combining racketeering practices and bribery.⁵⁰ One report on corruption in Cameroon's forest sector went as far as to call an inter-ministerial commission for the allocation of logging permits "a well-orchestrated criminal organisation".⁵¹ For civil servants, corruption is a way of topping up their low salaries.⁵² For companies, the calculation is easy: it is more profitable to pay bribes than comply with laws and pay taxes. The United Nations Environment Programme (UNEP) and INTERPOL Rapid Response Report in 2012, entitled 'Green Carbon: Black Trade', notes that: "[obtaining] permits illegally or [passing] bribes, investments, collusive corruption and tax fraud, combined with low risk and high demand, make it a highly profitable illegal business, with revenues up to 50-10 fold higher than legal practices for all parties involved".⁵³ Many companies do not pay the taxes they owe to the State. Tax avoidance is also often practised on a large scale.⁵⁴

Logging deprives local populations of resources essential to their way of life

Bad governance perpetuates the poverty of local populations. In addition, industrial logging deprives local populations of resources essential to their traditional way of life. Logging removes species that have a great cultural, economic and social value for them. The fruits of certain tree species whose wood is in high demand in consumer countries are used for medicine and cooking by forest communities.⁵⁵ Research by the NGO Friends of the Earth-France has shown the consequences of the felling of moabi (African pearwood) by a French company in eastern Cameroon: the populations who traditionally use the fruit of the moabi have been harmed by the activities of the company, as 90 % of the old moabi that can bear fruit are felled.⁵⁶ In particular, women lose a source of income with each tree that is felled.

A study of a forest management unit in Gabon has shown that "the felling of trees that have many uses [...] and a high market value is a source of conflicts between the company and villagers, especially as the species become rare".⁵⁷ A report by the NGO *Agence d'aide à la coopération technique et au développement* (ACTED) states that: "Logging produces indirect negative effects on the availability or continuity of certain NTFPs (non-timber forest products). The felling of trees in which caterpillars exploited by the communities live (e.g. Sapele, Sipo, Ayous [Abachi], Moabi...) and the opening up of roads have been mentioned by the local and indigenous communities as fundamental reasons for the present reduction in the number of certain NTFPs".⁵⁸ These observations have been confirmed by 83 communities affected by logging operations in Cameroon and the DRC surveyed by Global Witness in 2010 and 2011.⁵⁹ Indigenous peoples are particularly concerned. For many years, a number of NGOs have been alerting public authorities about the impacts on them. In 2005, a survey showed the extent to which pygmy communities in Gabon had been affected by the activities of a logging company: "The destruction of the natural habitat of the pygmies in UFA1 [a forest management unit] forces them to move closer and closer to villages and try to integrate into the so-called 'civilised' world. This increased closeness with the villagers is done with a lot of difficulty".⁶⁰ Indigenous communities visited by Global Witness in Cameroon in 2010 shared similar experiences and problems.⁶¹ The loss of forest resources forces them to settle along the roads on land belonging to the Bantu settler community, without any property rights or assistance from the State. Indigenous and settler communities, now competing for access to land and wildlife resources, can end up fighting with each other.⁶² Conflicts thrive on such displacement and increased poverty. Whatever the level of forest tax paid by the companies to the State, it will always be lower than the resources the forest provides to local populations in the long term.

As for the jobs created by industrial logging, local populations hardly benefit; only rarely can they get access to skilled jobs. "It is quite common that most of the skilled jobs are held by workers from outside the area, and only a few are offered to local workers", explain Brown and Ekoko.⁶³ According to a study carried out in Cameroon, a logging company set up operations near two villages (Gouté and Djémiong) but only employed two people from these

two localities in 1995, and only five in 2008 from an active population of 250 people⁶⁴. Indigenous communities are at a particular disadvantage in this respect. Generally, the jobs offered by logging companies are “temporary”⁶⁵ and the working conditions often dire.⁶⁶

The jobs are even more precarious because **industrial logging is highly dependent on the world market**. The 2008 global financial crisis highlighted its extreme fragility and its lack of viability in the medium and long term: the crisis quickly resulted in the halting of work on several logging sites and wood-processing plants throughout the Congo Basin.⁶⁷ According to estimates, 25,000-30,000 people in the Congo Basin lost their job – definitively or temporarily – during the financial crisis.⁶⁸

This is another example of the FMP being inappropriate and inefficient. It fails to take account of the culture and consumption habits of local populations. It even has a perverse effect. An FMP usually forces logging companies to follow a set of specifications agreed with the affected populations, also involving the local authorities, to provide facilities for the community such as schools, health centres, roads, etc. However, this system, a legacy of the colonial era (the concessionary companies were charged with developing the colony’s infrastructures), takes responsibility away from the State and does not lead to ‘sustainability’. Indeed, when a logging company leaves after its concession has ended, the investments it has made are not maintained. In a 2010 survey carried out in Cameroon, Global Witness saw derelict villages without any social infrastructure after the logging company had left the scene. After the end of logging operations, the population in these old logging sites tends to decrease quickly, due to the departure of immigrant labour, shopkeepers and providers of different administrative and technical services linked to logging. A part of the local population can become dependent on the sale of goods and services to the employees of the logging companies. This situation is made worse by the fact that the forest, now degraded, is no longer capable of fulfilling the needs of the communities, which previously depended on it to sustain their traditional way of life.⁶⁹

The evaluation of the AFD’s policy noted that “**the social dimension is seen to be one of the weak links in the chain in the FMP approach, including those supported by the AFD**, which is probably the most disappointing thing”.⁷⁰ It adds: “The socioeconomic benefits for local communities are still weak (particularly as there have been no benefits for them from forest taxes).”⁷¹ This means that the FMPs simply describe the situation “without going into detail on the socioeconomic elements required to define actions that could contribute to development at local level”.⁷² Furthermore, “the companies have not gone very far in terms of specific actions, being more guided by a concern for buying social peace from a few local leaders than a desire to carry out authentic development projects”.

The importance of the informal sector for socio-economic development

The interest shown in the logging industry by aid donors and producer country governments overlooks the hundreds of thousands of jobs in the informal economy arising from forests (artisanal wood-sawing, non-forest timber products, fuelwood, hunting etc.). Rarely taken into account in official statistics, their value is often much higher than that generated by the logging industry. As just one example, in recent years, the informal production of artisanal sawn-wood has increased considerably to respond to the demand for wood in the countries in the region.⁷³ Indeed, the artisanal sawing sector has become the biggest in terms of volume of wood produced, income and jobs. In Cameroon it accounts for 45,000 direct jobs, that is three times the number of jobs in the logging industry (13,000).⁷⁴ More broadly, informal forest-related sectors provide employment for several hundred thousand people in Cameroon, e.g. through village hunting (in which 460,000 people are involved).⁷⁵ However, despite the importance of this informal economy, it is not valued by the authorities and only the logging industry is considered worthy of support. The activities of the informal sector, with an impact on the environment, clearly need to be properly monitored and controlled.

The non-implementation of FMPs

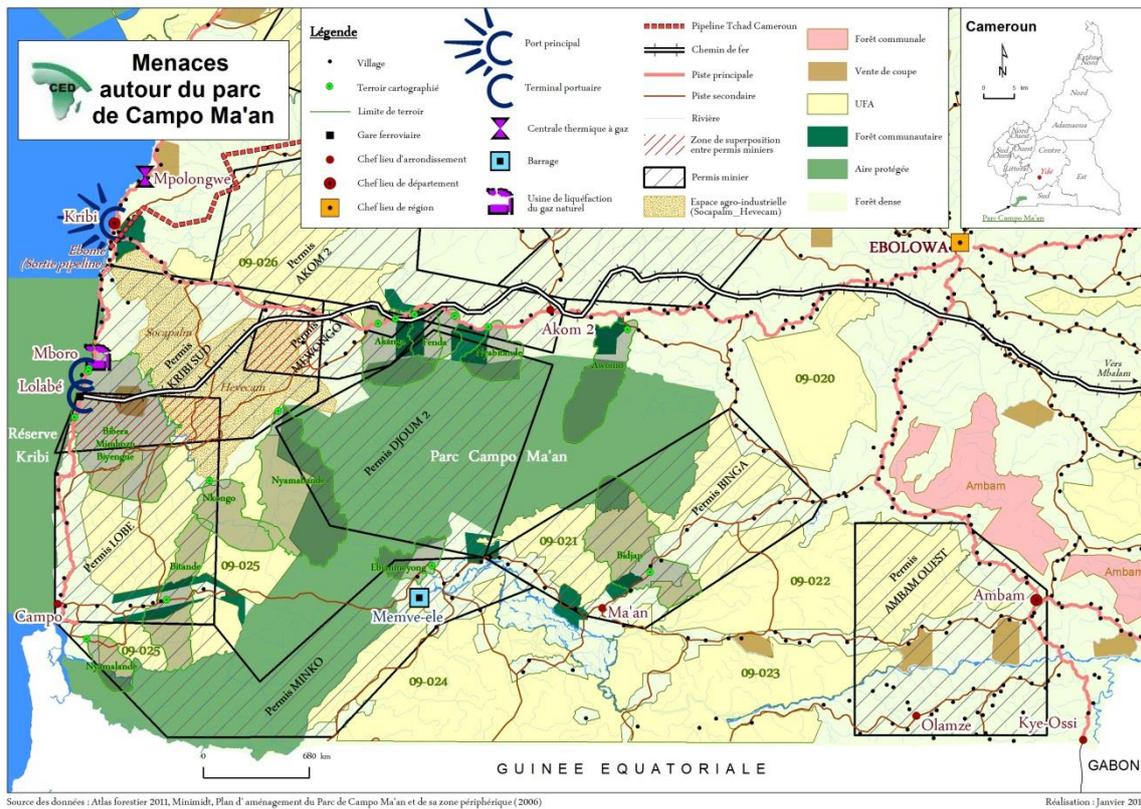
Several studies indicate that companies do not apply their FMPs. According to GTZ, in **Cameroon not one FMP of 20 met legal standards in 2006.**⁷⁶ In CAR, testimonies and at least one report show that companies do not observe their management plans.⁷⁷ In the DRC too, one study points out that “management plans [are] not always applied in the way they should be”.⁷⁸ The evaluation of World Bank policy by its Independent Evaluation Group (IEG) explains that “[...] experience in Cambodia and in Central and West Africa has shown that governments have either been unable or unwilling to effectively oversee the sustainable management of industrial timber concessions. The lessons emerging from 15 years of engagement in Cameroon and Gabon – where a combination of weak laws and regulations and inadequate oversight and enforcement has resulted in **operations that are causing substantial environmental and social harm** – point to the need to examine whether forests, particularly tropical moist forests, can be managed sustainably in a concession regime in a weak governance environment. In Cameroon, for example, the World Bank has included the high proportion of approved management plans (66 percent as of 2009) as one of its major achievements, but a body of independent analysis has shown that **approved management plans are not meeting the intended sustainability or social objectives.**”⁷⁹ For its part, the evaluation of the AFD’s programmes indicated that the forest management approach is suffering “a general deficit of monitoring”,⁸⁰ and in addition, “It is to be noted, however, that 50% of the surface areas [of AFD projects in the Congo Basin] are focused on one country, Central African Republic (CAR), without any guarantee of a real commitment to sustainable management on the part of the company beneficiaries.”⁸¹

This evidence seems to confirm that the FMP was not created to protect the environment, but rather to enable large European companies to respond to the concerns of environmental NGOs about the damage caused by logging: “The FMP approach was adopted by the large companies for mainly commercial reasons to maintain markets following pressure by international NGOs (boycott threats in the period between 1990 and 2000), the **FMP being a tool that responds to criticisms and avoids a boycott by the large groups under attack**”, according to the official evaluation of AFD policy.⁸²

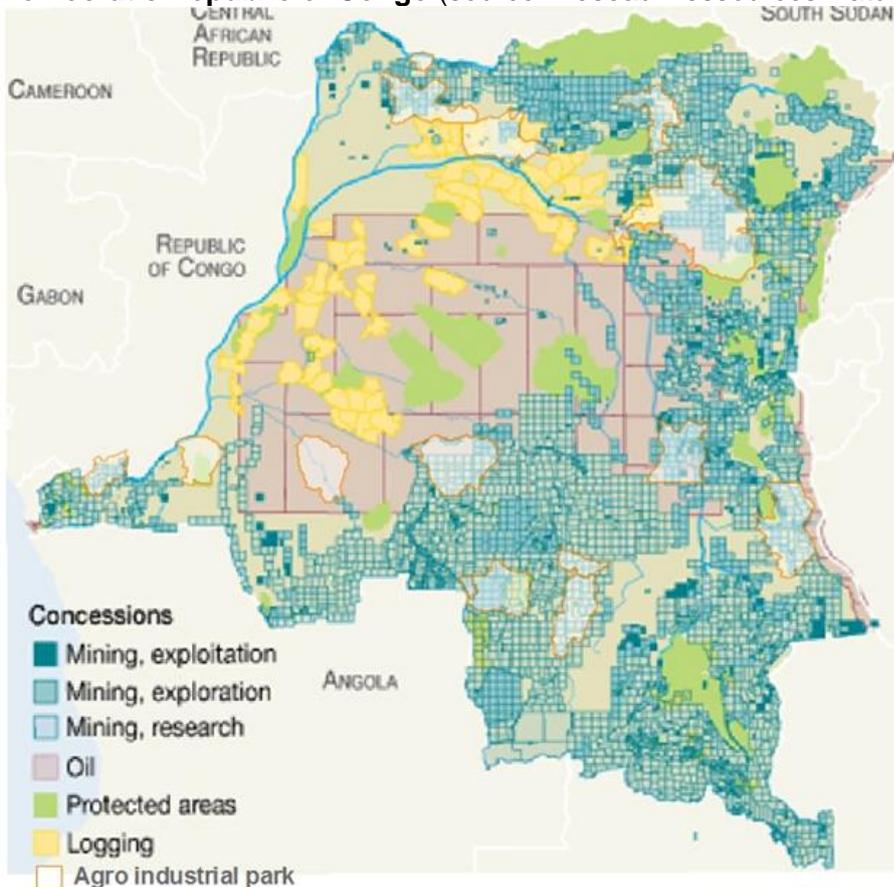
The lack of commitment to SFM on the part of producer states

There is yet another problem that challenges the implementation of FMPs. Compliance with FMPs has been undermined or rendered impossible by increasing government allocation of mining, agro-industrial, infrastructure and oil exploration permits across the forest estate in the Congo Basin.⁸³ This has led to forest clearance of areas supposedly under the “sustainable management” of logging concessions and conflicts between overlapping rights-holders. Maps of overlapping permits in Cameroon and DRC illustrate this phenomenon, a growing problem across the Congo Basin. The desire to monetise the forest since colonial times – ignoring the diverse values of the ecosystem – has inevitably led to the realisation by today’s producer States that they can make more money from the extractive industries, agro-industry like palm oil and large infrastructure projects than from logging. Hence the logging industry is not a “third way” between deforestation and conservation, but appears as a stage on the road to deforestation. This represents a challenge for donors like AFD, which will see its investments in logging concessions nullified over time. Certainly the partnership between donors and Congo Basin states will have to be thoroughly reviewed to ensure they uphold the new Paris climate accord and the UN Sustainable Development Goals (SDGs).

Cameroon



Democratic Republic of Congo (source: Réseau Ressources Naturelles, DRC, 2015)



Responding to global demand for timber or reshaping the market?

The AFD's sectoral position paper outlines the forecast that "global demand for industrially logged timber should multiply by four from now until 2050 and a deficit in supply will reach 4.5 billion m³ in 2050.⁸⁴ The paper expects that this demand should be satisfied by plantations and natural forests. It also claims that there is no substitute for wood: "These specific products made from wood have special characteristics that limit the options for substitution by other raw materials".⁸⁵ However, alternative fibres already exist, such as hemp or bamboo, and new technologies have a capacity for innovation that could reduce the pressure on forests.⁸⁶

According to the International Action for Primary Forests: "We can develop solutions to meet global wood demand that do not involve resorting to exploiting primary forests. A much larger proportion of global timber demand can be met through using existing plantations on previously cleared land or degraded forests with low biodiversity value, or by using alternative fibers, alongside a reduction in wasteful consumption. Industrial logging of primary forests in developing countries often targets niche luxury markets, or markets for products that could be substituted from plantations, such as decking or plywood."⁸⁷

Conclusion: for a genuine 'sustainable management' of tropical forests

Currently, the priority of actors involved in the forest sector in the Congo Basin seems to be to ensure, above all, that logging remains "profitable", to the detriment of the conservation of these forests or the future of their inhabitants. As the AFD's own evaluation has stated: "The environmental and social objectives that sustainable forest management could achieve are basically analysed and experienced as constraints on logging that need to be internalised, and less as fundamental strategic issues of innovation for the management of these ecosystems and the conservation of their environmental qualities".⁸⁸

It is clear that there has never been a proper evaluation of the real impacts and contributions of the logging industry. In order to carry one out, one would have to take into account the cost of corruption in the sector, the impacts on customary and land rights, access to land and forest resources by local and indigenous communities etc. As things stand, the evidence indicates that the Congo Basin's logging industry has harmful environmental, social and economic effects, even when it is under 'management'.

In this context, it appears very problematic that the AFD continues to promote ill-adapted tools and to support the logging industry financially and politically in complex and fragile tropical forests. This is certainly not a conservation strategy for biodiversity, which is the primary objective of its Horizontal Framework of Intervention on Biodiversity.

It is time to redefine what is meant by 'sustainable forest management' to ensure a genuinely sustainable future for the Congo Basin rainforest.

RECOMMENDATIONS⁸⁹

We call on the AFD to:

- End its support for industrial logging in the Congo Basin, through a phase-out according to an established calendar, and instead support genuinely sustainable alternatives that protect tropical rainforests and forest-dependent local and indigenous communities. The AFD should support innovative, alternative approaches to sustainable forest management, which secures the land and customary rights of local and indigenous communities, such as community forests or the co-management of forested areas.
- Guarantee that no logging should take place in intact forest landscapes, prioritise the protection of intact forest areas, and commit to not supporting companies where independent reports signal illegalities, complicity with human rights violations and the non-respect of the free, prior and informed consent of local and indigenous communities.
- Oppose the lifting of the moratorium on new logging concessions in Democratic Republic of Congo, in view of the sustainability and governance problems described herein, and in order to allow the piloting of other models of forest management that secure the rights of local communities and ensure ecosystem preservation.
- Ensure that French funds made available for tropical rainforests through the COP21, FLEGT and REDD+ processes are not used to subsidise industrial logging via the failed model of 'sustainable forest management'.



Alliance of Leading Environmental Researchers & Thinkers



Regnskogfondet

RAINFOREST FOUNDATION NORWAY



global witness



ACF AFRICAN CONSERVATION FOUNDATION



- ¹ « La gestion durable des forêts tropicales », AFD, May 2013.
- ² France still has several logging companies operating in the region, the largest of which is Rougier, which controls more than 2 million hectares of forest across Cameroon, Republic of Congo, Gabon and Central African Republic.
- ³ *Prise en compte de la biodiversité dans les concessions forestières d'Afrique centrale*, A. Billand, J. Fournier, L. Rieu, O. Souvannavong, Cirad, FAO, 2010
- ⁴ Cyclope Report 2014.
- ⁵ *Notions sur les structures et dynamique des forêts tropicales humides*, Jean-Pierre Pascal, Revue Forestière Française, 55 (sp.), 118-130, 2003.
- ⁶ « La forêt primaire est en danger imminent », Les Echos, 15 March 2006.
- ⁷ *Code régional d'exploitation forestière à faible impact dans les forêts denses tropicales humides d'Afrique centrale et de l'Ouest*, Food and Agriculture Organization of the United Nations, 2003, p116.
- ⁸ *Prise en compte de la biodiversité dans les concessions forestières d'Afrique centrale*, A. Billand, J. Fournier, L. Rieu, O. Souvannavong, Cirad, FAO, 2010, p9.
- ⁹ *Prise en compte de la biodiversité dans les concessions forestières d'Afrique centrale*, A. Billand, J. Fournier, L. Rieu, O. Souvannavong, Cirad, FAO, 2010, p9.
- ¹⁰ Expansion of Industrial Logging in Central Africa, Nadine T. Laporte,* Jared A. Stabach, Robert Grosch, Tiffany S. Lin, Scott J. Goetz, 2007. Science 316: 1451–1451.
- ¹¹ Forest elephant crisis in the Congo Basin, Blake et al, 2007.
- ¹² FAO, ATIBT (1999) Road infrastructures in tropical forests - Road to development or road to destruction?
- ¹³ Bushmeat Supply and Consumption in a Tropical Logging Concession in Northern Congo, Poulsen et al., 2009.
- ¹⁴ Impacts of roads and linear clearings on tropical forests, Laurance, W.F., Goosem, M. and Laurance, S.G, Trends in Ecology and Evolution 24, 659-669, 2009.
- ¹⁵ *Prise en compte de la biodiversité dans les concessions forestières d'Afrique centrale*, A. Billand, J. Fournier, L. Rieu, O. Souvannavong, Cirad, FAO, 2010
- ¹⁶ International Action for Primary Forests: Statement of principles. See <http://primaryforest.org/>
- ¹⁷ Zimmerman, B.L. and Kormos, C.F. (2012). Prospects for Sustainable Logging in Tropical Forests. BioScience 62: 479–487.
- Shearman, P., Bryan, J., Laurance, W.F. (2012). Are we approaching 'peak timber' in the tropics? Biol. Conserv., doi:10.1016/j.biocon.2011.10.036. Moen, J., Rist, L., Bishop, K., Chapin III, F.S., Ellison, D., Kuuluvainen, T., Petersson, H., Puettmann, K.J., Rayner, J., Warkentin, I.G. and Bradshaw, C.J.A. (2014). Eye on the taiga: removing global policy impediments to safeguard the boreal forest. Doi: 10.1111/conl.12098. Lindenmayer, D.B. and Laurance, W.F. (2012). A history of hubris – Cautionary lessons in ecologically sustainable forest management. Biol. Cons. 151 11-16.
- ¹⁸ "Catastrophic Declines in Wilderness Areas Undermine Global Environment Targets", Watson et al, Current Biology 26, 1–6, November 7, 2016.
- ¹⁹ *Cadre d'Intervention Transversal Biodiversité 2013-2016*, AFD
- ²⁰ Managing Forest Resources for Sustainable Development, An Evaluation of World Bank Group Experience, IEG WB, IFC, MIGA, 5 February 2013
- ²¹ *Notions sur les structures et dynamique des forêts tropicales humides*, Jean-Pierre Pascal, Revue Forestière Française, 55 (sp.), 118-130, 2003
- ²² *Conserver la biodiversité du Bassin du Congo, Capitalisation des expériences cofinancées par le FFEM*, Fonds Français pour l'Environnement Mondial, 2010
- ²³ *Notions sur les structures et dynamique des forêts tropicales humides*, Jean-Pierre Pascal, Revue Forestière Française, 55 (sp.), 118-130, 2003, p128
- ²⁴ *Notions sur les structures et dynamique des forêts tropicales humides*, Jean-Pierre Pascal, Revue Forestière Française, 55 (sp.), 118-130, 2003, 128.
- ²⁵ *Secteur forestier dans le bassin du Congo: 20 ans d'intervention de l'AFD*, Samyn J.M. & al., French Development Agency, 2011, p100.
- ²⁶ Roberto Cazzolla Gatti, Simona Castaldi, Jeremy A. Lindsell, David A. Coomes, Marco Marchetti, Mauro Maesano, Arianna Di Paola, Francesco Paparella, Riccardo Valentini. The impact of selective logging and clearcutting on forest structure, tree diversity and above-ground biomass of African tropical forests. Ecological Research January 2015, Volume 30, Issue 1, pp 119-132.
- ²⁷ Thompson I., Mackey B., McNulty S. and Mosseler A. (2009). Forest Resilience, Biodiversity, and Climate Change. A synthesis of the biodiversity/ resilience/stability relationship in forest ecosystems. Secretariat of the Convention on Biological Diversity, Montreal. Technical Series no. 43, 67 pages; <https://www.cbd.int/doc/publications/cbd-ts-43-en.pdf>
- ²⁸ *Le projet DynAfFor, ou: comment réunir résultats scientifiques et choix politiques*, ATIBT, 30 December 2014.
- ²⁹ See Cerutti et al. (2008), Sustainable Forest Management in Cameroon Needs More than an Approved Forest Management Plan
- ³⁰ See for an account of this practice : "Etude comparative de 20 plans d'aménagement approuvés au Cameroun", Marc Vandenhoute, Jean-Louis Doucet, GTZ, 2006.
- ³¹ Deforestation and timber production in Congo after implementation of sustainable forest management policy, Brandt, Nolte, Agrawal, Land Use Policy 52 (2016) 15–22, 2016.
- ³² Foreign capital, forest change and regulatory compliance in Congo Basin forests, J S Brandt et al, Environmental Research Letters, 2014.
- ³³ Deforestation and timber production in Congo after implementation of sustainable forest management policy, Brandt, Nolte, Agrawal, Land Use Policy 52 (2016) 15–22, 2016.
- ³⁴ *L'aménagement forestier au Congo engendre-t-il plus de déforestation ?* A. Karsenty, P. Cerutti, J.-L. Doucet, F. E. Putz, C. Romero, C. Bernard, R. Eba'a Atyi, P. Douard, F. Claeys, S. Desbureaux, D. Ezzine de Blas, A. Fayolle, T. Fomété, E. Forni, V. Gond, S. Gourlet-Fleury, F. Kleinschroth, F. Mortier, R. Nasi, J.-C. Nguinguiri, C. Vermeulen, C. de Wasseige
- ³⁵ <http://dpfac.cirad.fr/amenagement-et-deforestation>
- ³⁶ *Cartographie du couvert forestier et des pertes de 2000 à 2014 de la République du Congo*, preliminary version, Ministry of Forest Economy and Sustainable Development, Republic of Congo, October 2015.

- ³⁷ *Secteur forestier dans le bassin du Congo: 20 ans d'intervention de l'AFD*, Samyn J.M. & al., French Development Agency, 2011, p105.
- ³⁸ *Prendre en compte le secteur informel*, Guillaume Lescuyer, Paolo Cerutti, Cirad, April 2013
- ³⁹ Westoby J, *The Purpose of Forests*. Oxford: Basil Blackwell, 1987, pp. 264–65. Referred to in "Forest Governance in Africa", Simon Counsell, SAIIA, 2009.
- ⁴⁰ CIRAD, World Bank, and CIFOR, 2007. *Forests in Post-Conflict Democratic Republic of Congo: Analysis of a Priority Agenda*, p.xi.
- ⁴¹ *Observation indépendante de la mise en application de la loi forestière et de la gouvernance (OI-FLEG) en appui aux APV FLEGT dans le bassin du Congo Rapport Annuel 2012*, REM, Forests Monitor, CAGDF.,
- ⁴² Report on Cameroon, accessible on www.forestsmonitor.org
- ⁴³ Blood timber: How Europe helped fund war in Central African Republic, Global Witness, July 2015.
- ⁴⁴ *L'exploitation des forêts de Centrafrique doit profiter à la population*, Le Monde, 29 September 2015.
- ⁴⁵ *La fiscalité forestière et l'implication des communautés locales à la gestion forestière au Cameroun*, Timothée Fomété, 2001. In Cameroon, half of the tax paid by logging companies to the State is supposed to go to rural communities in the concession area and invested in local development. Indeed, the Forest Act of 20 January 1994 states that "with a view to the development of local village communities in certain forests of the national domain allocated for exploitation, a part of the revenues derived from the sale of wood products should benefit said communities (...) the contribution of social projects is fully allocated to the communes concerned. It cannot be used for any other purpose."
- ⁴⁶ 50% of these annual taxes go to the State, 40% to the rural communities and 10% to socioeconomic projects in villages. See Broken promises: Forest revenue-sharing in Cameroon, Karl Morrison, World Resources Institute, 2009.
- ⁴⁷ Broken promises: Forest revenue-sharing in Cameroon, Karl Morrison, World Resources Institute, 2009, p1.
- ⁴⁸ Blood timber : How Europe helped fund war in Central African Republic , Global Witness, July 2015.
- ⁴⁹ See the numerous reports by the Independent Observer on the countries in question accessible, for example, on this website: www.rem.org.uk/Projects.html (accessed 11 March 2016).
- ⁵⁰ See a letter from a former operator to the Forest Ministry and ambassadors to Yaoundé denouncing the daily practices of corruption in the sector: *La corruption gangrène la forêt camerounaise*, AFP, 12 April 2008. Étude de l'importance économique et sociale du secteur forestier et faunique au Cameroun, Cifor, 2013. Concessions à la pauvreté, Forests Monitor, The Rainforest Foundation, February 2007
- ⁵¹ *Rapport sur l'état de la lutte contre la corruption au Cameroun en 2011*, CONAC, 2011.
- ⁵² *Forêts tropicales et mondialisation: Les mutations des politiques forestières en Afrique francophone et à Madagascar*, A. Bertrand, P. Montagne, A. Karsenty, L'Harmattan, 2006.
- ⁵³ Green Carbon, Black Trade UNEP –Interpol, 2012.
- ⁵⁴ See for example, The Cut-Price Sale of DRC's Forests. Tax avoidance, illegal deals: 90% of taxes missing from public coffers, Global Witness, October 2013.
- ⁵⁵ According to a study conducted between 1994 and 1996 on the populations around the Dja Reserve in eastern Cameroon, the moabi is used for more than 50 medical conditions. See *Moabi, arbre de vie ou de profit*, Les Amis de la Terre France et Cameroun », 2005.
- ⁵⁶ *L'Est du Cameroun privé des fruits du moabi*, Libération, 2006
- ⁵⁷ *Évaluation des impacts socio-économiques: cas d'unité forestière d'aménagement de la compagnie forestière Leroy-Gabon*, Célestine Mengue Medou and Jean-Philippe Waaub, VertigO – online magazine on environment sciences, Volume 6 Issue 2, September 2005
- ⁵⁸ *Etude : impact de l'exploitation forestière sur les communautés locales, et particulièrement sur les peuples autochtones*, ACTED – November 2012, p46.
- ⁵⁹ Interviews with local communities, Global Witness, 2010 and 2011.
- ⁶⁰ *Évaluation des impacts socio-économiques: cas d'unité forestière d'aménagement de la compagnie forestière Leroy-Gabon*, Célestine Mengue Medou and Jean-Philippe Waaub, VertigO - online magazine on environmental sciences, Volume 6 Issue 2, September 2005
- ⁶¹ The impacts of industrial logging on the indigenous Baka people of Cameroon have been documented on film in: 'Baka: A Cry from the Rainforest', Phil Agland, BBC2, 2012. This documentary examined the lives and livelihoods of the Baka people twenty-five years after filmmaker Phil Agland's first documentary, 'Baka: People of the Rainforest'.
- ⁶² *Concessions à la pauvreté*, Forests Monitor, The Rainforest Foundation, February 2007. Also see: *Évaluation des impacts socio-économiques: cas d'unité forestière d'aménagement de la compagnie forestière Leroy-Gabon*, Célestine Mengue Medou and Jean-Philippe Waaub, VertigO - online magazine on environmental sciences, Volume 6 Issue 2, September 2005
- ⁶³ *Forest Encounters: Synergy Among Agents of Forest Change in Southern Cameroon*, Brown, K.; Ekoko, F, Society and Natural Resources, 2001.
- ⁶⁴ Logging concessions and local livelihoods in Cameroon: from indifference to alliance? G Lescuyer, SA Mvondo, JN Essoungou, V Toison, JF Trébuchon, *Ecology and Society* 17 (1), 7, 2012.
- ⁶⁵ *L'exploitation abusive des forêts équatoriales du Cameroun*, Greenpeace Belgium, 1999. This report also pointed out that "foreign companies reserve the best-paid jobs for foreign workers".
- ⁶⁶ *Concessions à la pauvreté*, Forests Monitor, The Rainforest Foundation, February 2007. Also see: *Évaluation des impacts socio-économiques: cas d'unité forestière d'aménagement de la compagnie forestière Leroy-Gabon*, Célestine Mengue Medou and Jean-Philippe Waaub, VertigO - online magazine on environmental sciences, Volume 6 Issue 2, September 2005
- ⁶⁷ Karsenty A., Bayol N.. 2012. In: De Wasseige Carlos (ed.), De Marcken Paya (ed.), Bayol Nicolas (ed.), Hiol Hiol F. (ed.), Mayaux Philippe (ed.), Desclée B. (ed.), Billand Alain (ed.), Nasi Robert (ed.). *Les forêts du Congo Basin: Etat des forêts 2010*. Luxembourg: Publications Office of the European Union, pp 171-181.
- ⁶⁸ Karsenty A., Bayol N.. 2012. In: De Wasseige Carlos (ed.), De Marcken Paya (ed.), Bayol Nicolas (ed.), Hiol Hiol F. (ed.), Mayaux Philippe (ed.), Desclée B. (ed.), Billand Alain (ed.), Nasi Robert (ed.). *Les forêts du Congo Basin: Etat des forêts 2010*. Luxembourg: Publications Office of the European Union, p 173.
- ⁶⁹ *Déforestation durable*, film, Les Amis de la Terre France/Cameroun 2012. Also see: *Gouvernance des ressources forestières au Gabon: acteurs et enjeux*, Armel Gildas Mouloungui, doctoral thesis, University of Orléans, 2014.
- ⁷⁰ *Secteur forestier dans le bassin du Congo: 20 ans d'intervention de l'AFD*, Samyn J.M. & al., French Development Agency, 2011, p.104
- ⁷¹ *Secteur forestier dans le bassin du Congo : 20 ans d'intervention de l'AFD*, Samyn J.M. & al., Agence française de développement, 2011, p10.

⁷² *Secteur forestier dans le bassin du Congo : 20 ans d'intervention de l'AFD*, Samyn J.M. & al., Agence française de développement, 2011, p104.

⁷³ This artisanal logging should be distinguished from "semi-industrial" logging. Global Witness' 2013 report, Logging in the shadows, identified a largely hidden pattern of abuse across Cameroon, the Democratic Republic of Congo, Ghana and Liberia, in which permits designed to promote small businesses and meet local needs were being allocated in their hundreds to industrial logging companies.

⁷⁴ *Prendre en compte le secteur informel*, Guillaume Lescuyer, Paolo Cerutti, Cirad, April 2013

⁷⁵ *Etude de l'importance économique and sociale du secteur forestier and faunique dans les Etats d'Afrique centrale, Cas du Cameroun*, Richard Eba'a Atyi, Guillaume Lescuyer, Jonas Ngouhouo Poufoun, Thérèse Moulendè Fouda, Ed. CIFOR, 2013.

⁷⁶ *Etude comparative de 20 plans d'aménagement approuvés au Cameroun*, Marc Vandenhoute, Jean-Louis Doucet, GTZ, 2006.

⁷⁷ Blood timber : How Europe helped fund war in Central African Republic , Global Witness, July 2015.

⁷⁸ *Plan d'investissement REDD+ République Démocratique du Congo 2015 – 2020*, draft of 24 September 2015, p25.

⁷⁹ *Managing Forest Resources for Sustainable Development, An Evaluation of World Bank Group Experience*, IEG WB, IFC, MIGA, 5 February 2013.

⁸⁰ *Secteur forestier dans le bassin du Congo: 20 ans d'intervention de l'AFD*, Samyn J.M. & al., French Development Agency, 2011, p97.

⁸¹ *Secteur forestier dans le bassin du Congo : 20 ans d'intervention de l'AFD*, Samyn J.M. & al., Agence française de développement, 2011, p9.

⁸² *Secteur forestier dans le bassin du Congo: 20 ans d'intervention de l'AFD*, Samyn J.M. & al., French Development Agency, 2011.

⁸³ *Droits d'accès et de contrôle des terres et des ressources naturelles : Risques et opportunités issus des divergences entre lois foncières et sectorielles en Afrique* Projet, Presentation as part of COMIFAC project « Une approche régionale à la gestion durable des forêts de production d'Afrique Centrale », 29-31 janvier 2013.

⁸⁴ Africa will import – not export – wood, Global Environment Fund, 2013, mentioned in *Note sectorielle forêt*, AFD, September 2016, p17.

⁸⁵ *Note sectorielle forêt*, AFD, septembre 2016, p16.

⁸⁶ For an overview as well as a methodology for their evaluation, see "Responsible Alternative Fibers: Assessment Methodology", WWF, 2014.

⁸⁷ International Action for Primary Forests: Statement of principles. See <http://primaryforest.org/>

⁸⁸ *La gestion durable des forêts tropicales*, AFD, May 2013, p175.

⁸⁹ These recommendations were made in 2015 by Global Witness and a group of scientists and international and local NGOs: "To protect the planet's climate, France should phase out its support for industrial logging in the Congo Basin", signed by Brainforest Gabon, *Centre d'action, de formation et d'Intégration Social au Congo* (CAFISCO) DRC, Centre for Support of Sustainable Management of Tropical Forests (CAGDFT) DRC, *Coalition des Femmes Leaders pour l'Environnement et le Développement Durable* (CFLEDD) DRC, *Dynamique des Groupes des Peuples Autochtones* (DGPA) DRC, Dominick A. DellaSala, Chief Scientist and Forest Ecologist, Geos Institute US, Global Witness, Greenpeace, *Groupe de Travail Climat REDD* DRC, Francis Hallé, *Organisation Congolaise des Ecologistes et Amis de la Nature* (OCEAN) DRC, Rainforest Foundation UK, Rainforest Foundation Norway, *Réseau des Communicateurs de l'Environnement* (RCEN) DRC, *Réseau Ressources Naturelles* DRC, Maniema K.M. RRN DRC. RoadFree, December 2015.