



environmental
investigation
agency

RED ALERT

Regional Rosewood Crisis Hits Malian Forests and People

Source: EIA

EXECUTIVE SUMMARY

The rosewood crisis has been devastating West African forests and the livelihoods of its people for almost a decade. Illegal and unsustainable trade in *Pterocarpus erinaceus* (*P. erinaceus*) has persisted despite the listing on Appendix III and then II of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). Recent reports commissioned by or addressed to the CITES Secretariat, have shed light on expanding regional exploitation for international trade in violation of the Convention. EIA's new analysis, based on CITES trade data from 2016 to 2020, indicates a discrepancy of close to 2 million tons between quantities reported by exporters and importers. Importers have reported more than double the quantity reported by exporters.

The rosewood traffic in Mali is yet another example of the regional crisis. Since 2018, Mali has suffered two military coups, while the country has become one of the largest suppliers of rosewood to China, through the export of *P. erinaceus*. The relentless timber poaching in the southern forests of Mali has resulted in a significant decline of the species in multiple areas. EIA's research indicates that the international trade in *P. erinaceus* in its current form has continuously been prohibited in Mali since May 2020, via a harvest ban in effect from May 2020 to March 2021 and a log export ban regulation effective since February 2021. From May 2020 to January 2022, EIA estimates that China has imported over 123,400 tons of *P. erinaceus* from Mali - equivalent to approximately 4,500 containers, 365,900 logs, or 182,900 trees - in breach of Malian laws.

The situation in Mali and more broadly in West Africa calls for an urgent response, which should build on the lessons learned from other range States and the precedent set by the trade suspension in Nigeria. EIA recommends: (1) a consolidated Article XIII review for exporters - including Mali - and importers involved in the trade since 2016; (2) a regional trade suspension for all range States unless a scientifically robust non-detriment finding has been approved and legal acquisition findings are made prior to export; (3) effective support provided for wildlife crime enforcement and governance initiatives in West Africa.

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BACKGROUND

The insatiable demand for hongmu or “red wood,” a rare and valuable category of rosewood used primarily for antique-style furniture in China, has resulted in a sharp decrease in wild rosewood populations globally.¹ Primarily sourced from Southeast Asia prior to 2010, the exhaustion of these forests has led to the rapid expansion of trafficking networks into new frontiers in Africa and Central America.² Since 2015, West Africa has become the world’s top hongmu producing region, accounting for the majority of all hongmu log and sawn wood imports into China by quantity between January 2015 and December 2021 (Figure 1).³ According to EIA’s supply chain investigation and intelligence gathering, *P. erinaceus*, also known in the region as “kosso,” “keno,” or “bois de vène,” has been by far the primary target of the hongmu trade between West Africa and Asia.^{4,5}

In an attempt to curb the fast growing and largely informal international trade in *P. erinaceus*, African governments – in addition to instituting domestic measures like harvest and transport bans – joined forces in 2016 and collectively obtained the listing of the species on Appendix II of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), which took effect in January 2017.⁶

A REGIONAL CRISIS WITH A SUSPENSION PRECEDENT

Figure 2 offers an overview of the evolution of the total import of *P. erinaceus* by China (in value) and its origin from January 2010 to December 2021. Between January 2019 and December 2021, China has imported massive quantities of *P. erinaceus* from Sierra Leone (673,000 tons), Ghana (260,000 tons), Mali (232,000 tons), and The Gambia (189,000 tons).⁷ As of the 25th Meeting of the Plants Committee in June 2021, none of these countries had produced a scientifically robust non-detriment finding.⁸ The August 2019 report commissioned by the CITES Secretariat, and prepared by the United Nations Office on Drugs and Crime (UNODC), establishes that “very few countries in West and Central Africa have the capacity for making robust scientific-based non-detriment findings, no range State of *P. erinaceus* demonstrated that the provisions of Article IV were being met.”⁹

According to EIA’s investigations in Ghana, The Gambia, and Mali (see paragraphs below), the situation in these countries is reminiscent of the unreliable implementation of the Convention in Nigeria, prior to the trade suspension of *P. erinaceus*.^{10,11} The Secretariat’s conclusion following its field visit in Nigeria, can be equally applied to the current trade from other range States:

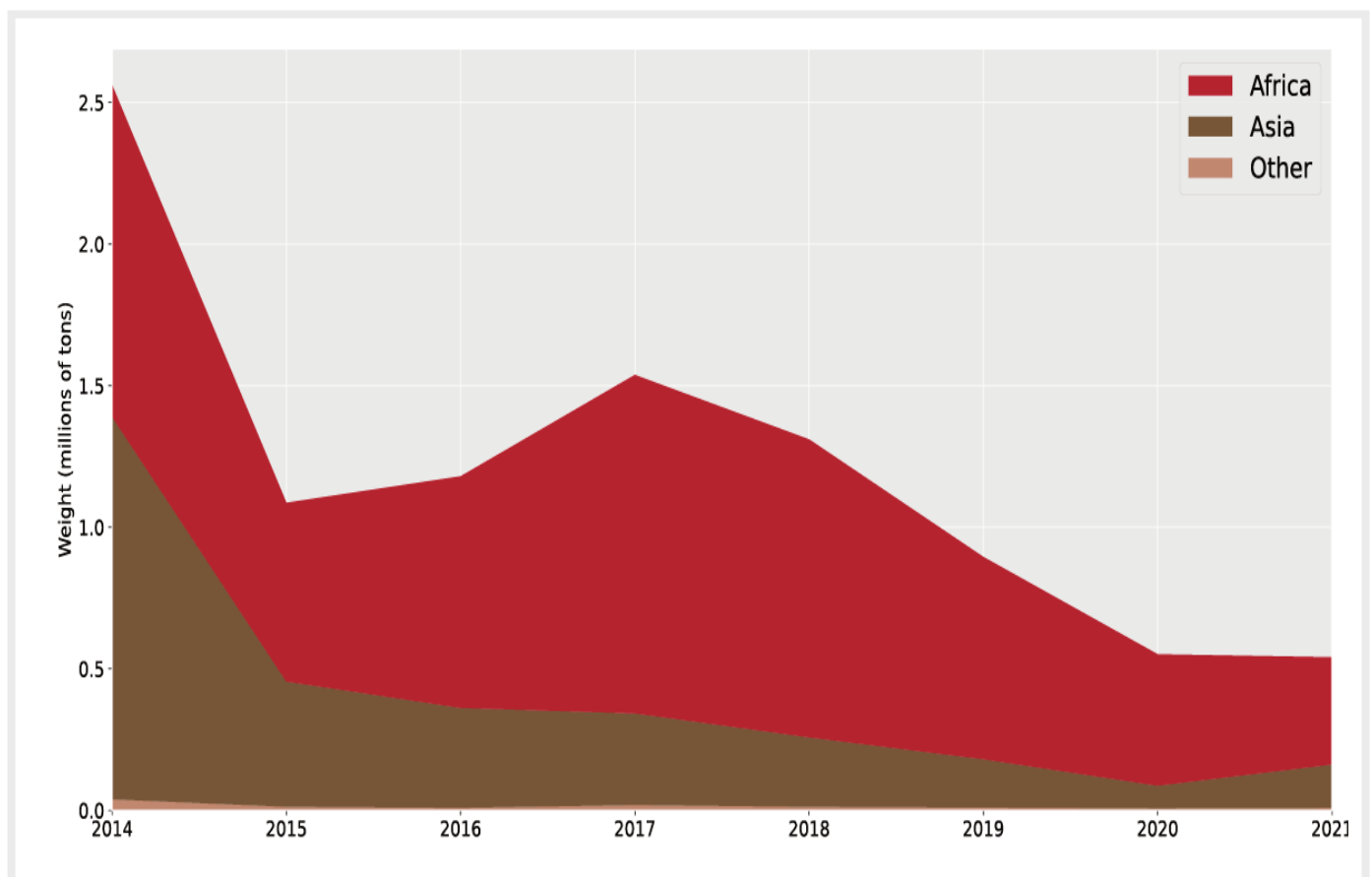


Figure 1
China imports of hongmu from the world, by weight

Source: EIA, based on Chinese customs data from the Trade Data Monitor.

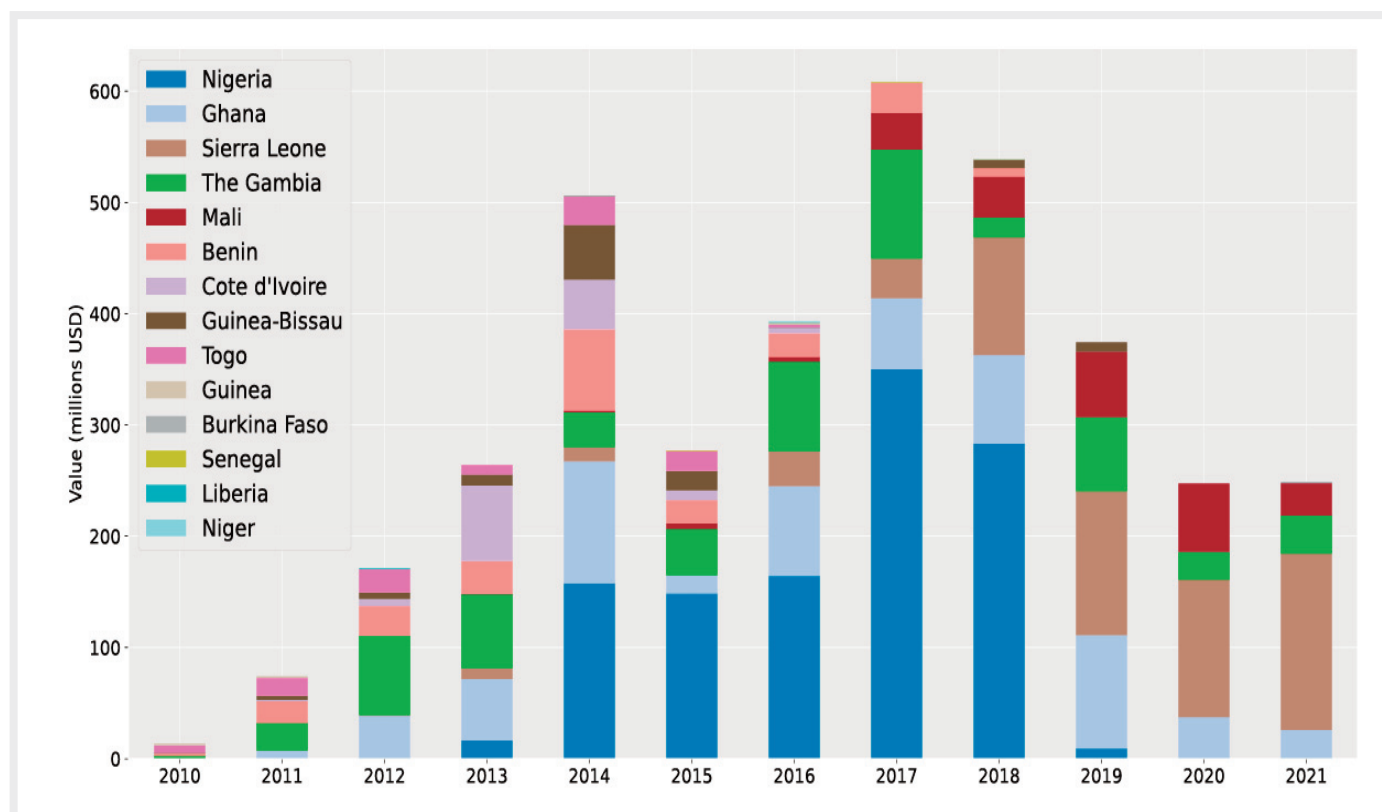


Figure 2
China imports of hongmu from West Africa, in value

Source: EIA, 2022 based on Chinese customs data from the Trade Data Monitor.

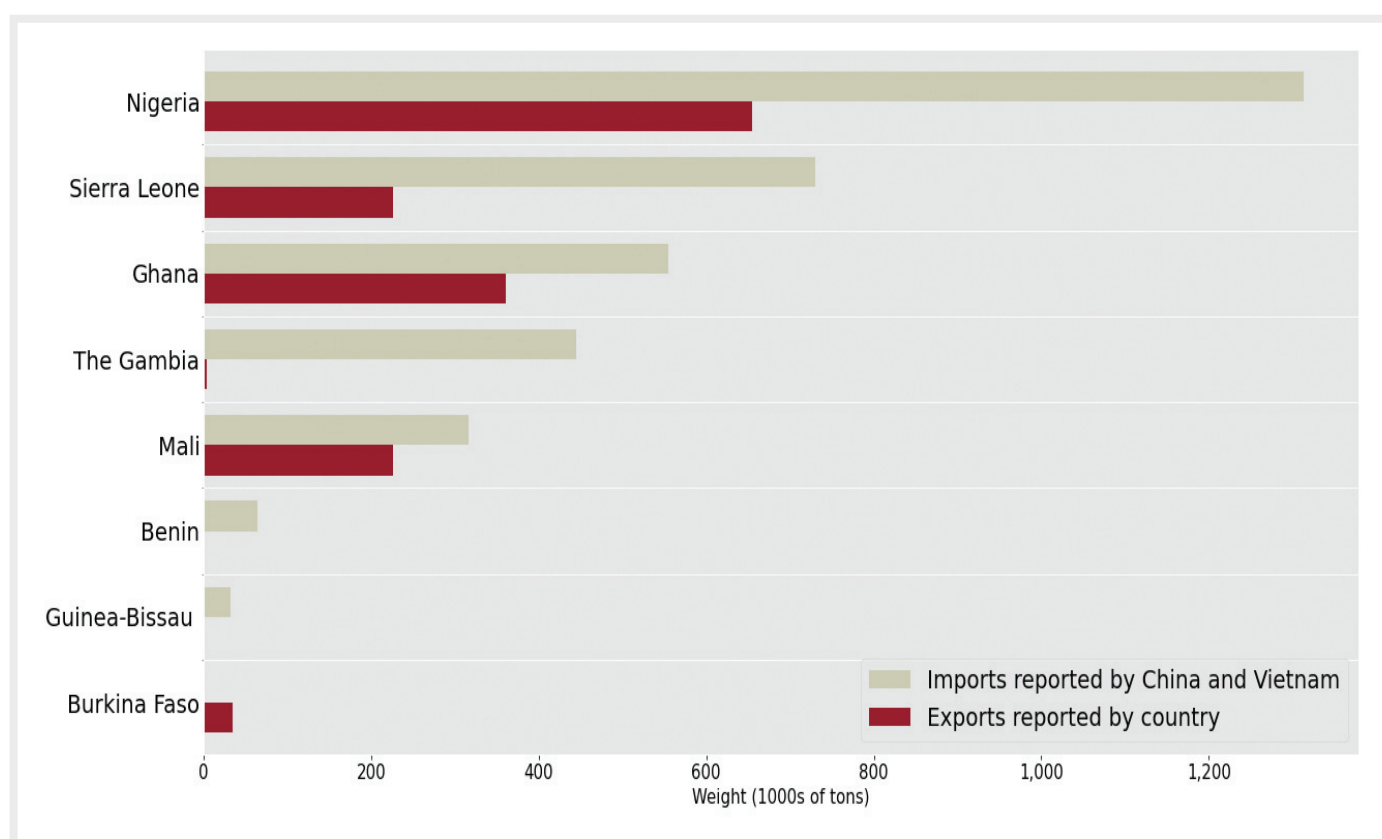


Figure 3
Discrepancy between reported import and export of *P. erinaceus*, logs and sawn wood, from 2016 to 2020, volume converted to weight

Source: EIA, 2022 based on CITES trade database

"[T]he Secretariat reminded the Nigerian Authorities that the issuance of an export permit provides a certification that the specimens it refers to have been legally acquired. The decisions of governmental authorities of other countries to authorize imports and issue re-export certificates are based upon these documents. It is imperative that such determinations be made in compliance with CITES and be accurate and reliable. **Otherwise, the authentication of CITES permits is a mere paper exercise that does not prove legality nor sustainability which are the two key objectives of the Convention** [emphasis added]."¹²

TRADE DISCREPANCY RED ALERTS

The comparative analysis of the trade data, based on the CITES trade database, provides further insight into the glaring irregularities of the international trade in *P. erinaceus*. According to the database, direct trade for commercial purposes only occurred from eight range States in West Africa between 2016 and 2020, namely Benin, Burkina Faso, The Gambia, Ghana, Guinea-Bissau, Mali, Nigeria, and Sierra Leone. Direct imports from range States of *P. erinaceus* have only been reported by China and Vietnam.

The discrepancies between the quantity declared as imported by China and Vietnam versus the quantity declared as exported by West African countries are

Alarming discrepancy according to CITES database: importers have reported more than double the quantity reported by exporters.

substantial and raise serious concerns (Figure 3). Between 2016 and 2020, importing countries report a total of 3.5 million tons (logs and sawn wood) while exporting countries report 1.5 million tons (logs and sawn wood), i.e. a discrepancy of nearly 2 million tons.^{13,14} Importers have reported more than double the weight reported by exporters.

PREYING ON MALIAN FORESTS

Mali's exports of *P. erinaceus* to China accelerated in the first quarter of 2017, when the Appendix II listing of the species came into force, and has since been increasing (Figure 4).

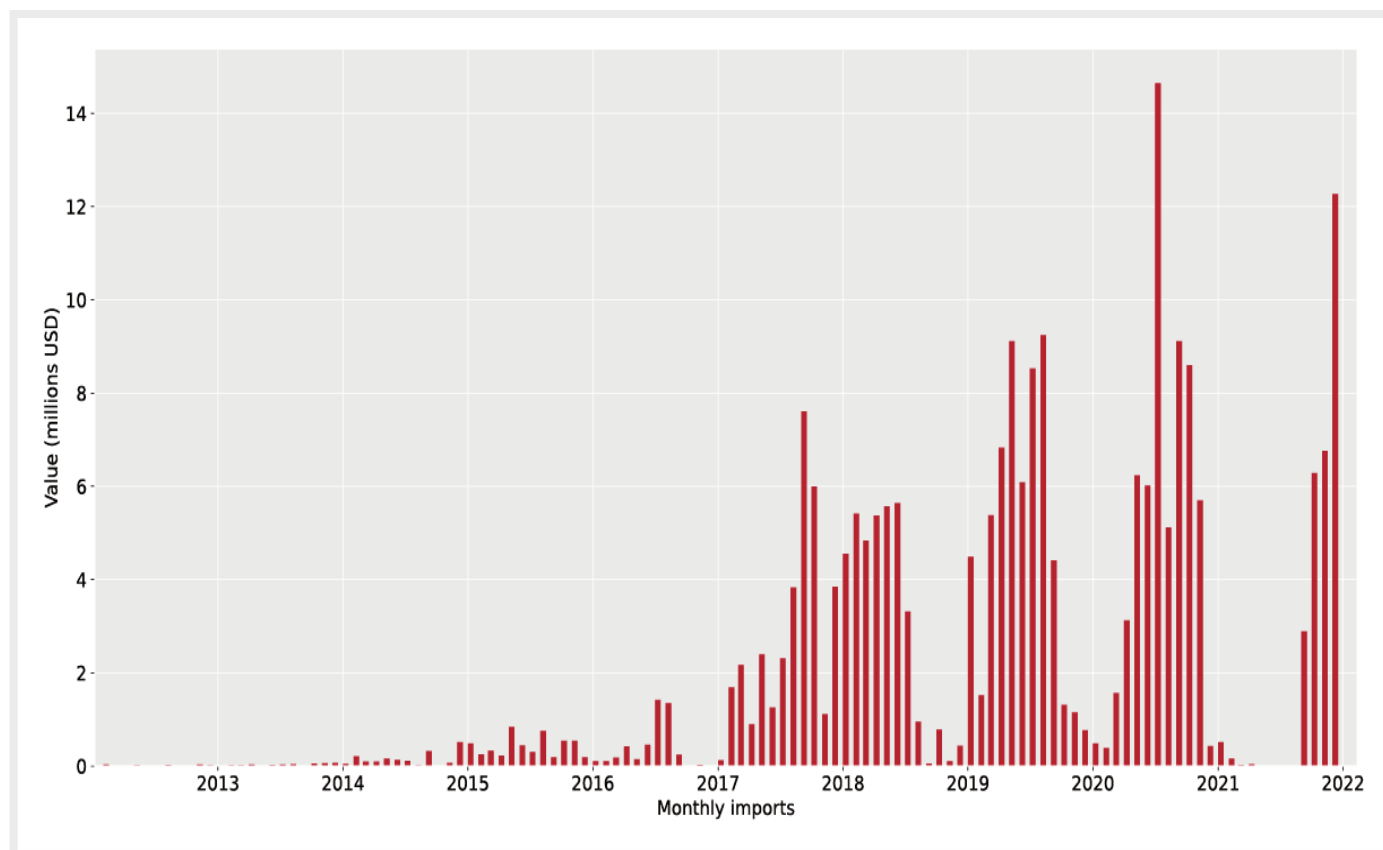


Figure 4
China imports of hongmu from Mali, in value

Source: EIA based on the Trade Data Monitor

The forests where *P. erinaceus* naturally grows in Mali are located in the three southern regions, Kayes, Koulikoro, and Sikasso. According to EIA's findings, logging teams first ransacked the forests (Sikasso, Bougouni, and Yanfolila areas) located at the border with Burkina Faso and Côte d'Ivoire in the Sikasso province, between 2013 and 2015.¹⁵ Once commercial trees became scarce, the exploitation moved north toward Koulikoro, Kita and Kangaba forest areas (Koulikoro region) from 2015 to 2018. Since 2018, logging squads have focused on the last remaining wild populations of *P. erinaceus* located in the Malian regions bordering Guinea and Senegal, specifically Kenieba, Didjan, and Fadougou forest areas (Figure 5).

Illegal exploitation of *P. erinaceus* has reportedly also taken place in protected areas, as the wild populations became scarce, in particular in the Monts Manding and the Kenieba-Baoulé forest reserves.¹⁶ These forested areas were intentionally set aside several decades ago, with the support from local populations, for preservation and controlled use. Reports also indicate illegal logging taking place in cemeteries, against the will of local communities.¹⁷

In May 2020, in order to regain control over the chaotic exploitation of the southern forests, the former Malian minister of environment, sanitation and sustainable development officially suspended the commercial exploitation of *P. erinaceus*.¹⁸ As stated by the ministry "All lumber and sawn wood exploitation activities are suspended in all their forms until further notice, on all national territory." The decision was reportedly widely popular, supported in particular by local communities and artisans.¹⁹

The suspension remained valid until Bernadette Keïta, then minister of environment, sanitation, and sustainable development, lifted it in March 2021.²⁰ The decision was criticized by multiple local associations from Kayes, Koulikoro, and Sikasso provinces (Figure 7).^{21,22}

Since 2018, Malian civil society organizations, whistleblowers, and local artisans have publicly denounced the legal loophole used by international traders to export squared *P. erinaceus* logs in breach of the national log export ban.^{23,24} The Malian forest code prohibits the export of "non- processed timber," per article 39 (provision reinforced by the interministerial decree 2015-1535/CI/MEF-SG of June 5, 2015). However, the lack of definition regarding what does and does not constitute processed timber was used for several years by traders to defend the legality of the export of squared logs, which is the form under which *P. erinaceus* has exclusively been exported from Mali according to EIA's investigation. The loophole was eventually closed in February 2021 when an interministerial decree established that square logs are not sufficiently processed products and therefore not allowed for export (Figure 6).²⁵

EIA's research indicates that international trade in *P. erinaceus* in its current form has continuously been prohibited in Mali since May 2020, via a harvest ban in effect from May 2020 to March 2021 and a log export ban regulation effective since February 2021. During this same period, EIA estimates that China has imported over 123,400 tons of *P. erinaceus* from Mali - equivalent to approximately 4,500 containers, 365,900 logs, or approximately 182,900 trees.



Figure 5
Trucks unloading *P. erinaceus* logs coming from the Malian Southern regions in one of the largest depots located near the capital Bamako.

- Vu le Décret n°2010-388/P-RM du 26 juillet 2010 fixant les taux des redevances perçues à l'occasion de l'exploitation des produits forestiers dans le domaine forestier de l'Etat ;
- Vu le Décret n°2010-412/P-RM du 03 août 2010 portant ratification de l'Accord International sur les bois tropicaux, adopté à Genève le 27 janvier 2006 ;
- Vu le Décret n°2011- 637/P-RM du 20 septembre 2011 déterminant les modalités et conditions d'exercice des droits conférés par les titres d'exploitation et de transport des produits forestiers ;
- Vu le Décret n°2018-0662/P-RM du 08 août 2018 portant réglementation de l'exploitation des produits forestiers dans le domaine forestier national ;
- Vu le Décret n°2018-0991/P-RM du 31 décembre 2018 relatif à l'Etude et à la Notice d'Impact Environnemental et Social ;
- Vu l'Arrêté Interministériel n°09-0788/MEIC-MF-SG du 07 avril 2009 fixant les modalités d'application du Décret n°00-505/P-RM du 16 octobre 2000 portant réglementation du commerce extérieur ;
- Vu l'Arrêté interministériel n°2015-135/MCI-MF-SG du 05 juin 2015 fixant la liste des produits prohibés à l'importation et l'exportation ;
- Vu l'Arrêté n°2012-0198/MEA-SG du 27 janvier 2012 fixant les modalités d'application du Décret n°07-155/P-RM du 10 mai 2007 fixant la liste des espèces locales de faune et de flore sauvages et les modalités d'obtention, d'autorisation, de production, de fabrication, de détention et d'utilisation à des fins commerciales d'objets provenant de ces espèces ;
- Vu le Décret n°2020-0074/PT-RM du 05 octobre 2020 portant nomination des membres du Gouvernement,

ARRETEMENT :

CHAPITRE I : DISPOSITIONS GENERALES

ARTICLE 1^{er} : Le présent arrêté détermine les modalités d'exportation et de réexportation du bois transformé.

ARTICLE 2 : Au sens du présent arrêté on entend par bois transformé, le bois ayant subi des opérations qui peuvent être qualifiées de la façon suivante :

a) Transformation de premier niveau :

Tout bois issu d'opérations de transformations effectuées sur le bois brut pour obtenir du bois massif extrait. Ainsi on distingue :

- poteaux : bois utilisé en position verticale, d'une longueur maximum de 300cm, de diamètre au gros bout et fin bout entre 80 et 20 cm ;
- plots : ensemble de plateaux sciés longitudinalement dans une bille par traits parallèles successifs et empilés de façon à reconstituer la bille sans les dosses.

b) Transformation de deuxième niveau :

Ensemble des opérations effectuées sur les produits de la première transformation et qui permettent d'obtenir des éléments semi-finis et/ou profilés.

Les produits issus de la deuxième transformation sont des bois ayant subi une opération de séchage, de traitement, de rabotage, de moulurage, de collage au moins. Ainsi on distingue :

- frise : produit issu de la transformation totale de bois, de dimensions variables en fonction de la commande dont les dimensions sont : épaisseur entre 10 et 14 mm, largeur entre 50 et 70 mm, longueur entre 250 et 400 mm ;
- parquet : produit issu de la transformation totale du bois, de dimensions variables mais plus grandes que celles de la frise. Petites planches de bois raboté servant généralement au revêtement de sols et des murs. Les dimensions des parquets en bois massif sont : épaisseur 10 et 15 mm, largeur 70 et 90 mm, longueur 400 et 1200 mm ;
- planche : produit de sciage de section rectangulaire ou carrée issu de la transformation de bois, de dimensions variables épaisseur 2 cm, largeur 30 cm, longueur 2,1 ou 4 m ;
- chevron : produit issu de la transformation totale de bois, de dimensions variables et de section carrée ou sensiblement carrée de côté compris entre 40 et 80 mm, longueur 4 m ;
- Produits issus du placage et du déroulage.

c) Transformation de troisième niveau :

Il s'agit des produits finis élaborés et de l'artisanat. Peuvent être qualifiés de produits finis élaborés et d'artisanat, l'ensemble des produits issus de la première ou de la deuxième transformation et qui permettent d'obtenir des produits finis.

Les produits de ce niveau de transformation sont les meubles, les menuiseries, les parquets contrecollés, le papier, le carton, les portes.

CHAPITRE II : QUALIFICATION DU BOIS TRANSFORME AUTORISE A L'EXPORTATION ET A LA REEXPORTATION

ARTICLE 3 : Seuls sont autorisés à l'exportation, les objets issus de bois d'essences forestières partiellement protégées, d'essences forestières de valeur économique ou d'essences forestières non protégées ayant subi des opérations de transformation préalables de deuxième ou de troisième niveau dans des unités industrielles ou artisanales autorisées à cet effet conformément aux dispositions des textes en vigueur.

ARTICLE 4 : Peuvent faire l'objet d'exportation, les bois transformés sous forme de frises, parquets, planches, chevrons, meubles, parquets contrecollés, papier, carton, porte.

ARTICLE 5 : Tout bois provenant d'une essence forestière importé à l'état brut ou n'ayant subi qu'une transformation de premier niveau, doit faire l'objet d'une opération de transformation de deuxième ou de troisième niveau dans une unité industrielle ou artisanale autorisée à cet effet au Mali avant toute opération de réexportation conformément aux dispositions du présent arrêté.

3

a) Transformation de premier niveau :

Tout bois issu d'opérations de transformations effectuées sur le bois brut pour obtenir du bois massif extrait. Ainsi on distingue :

- poteaux : bois utilisé en position verticale, d'une longueur maximum de 300cm, de diamètre au gros bout et fin bout entre 80 et 20 cm ;
- plots : ensemble de plateaux sciés longitudinalement dans une bille par traits parallèles successifs et empilés de façon à reconstituer la bille sans les dosses.

ARTICLE 3 : Seuls sont autorisés à l'exportation, les objets issus de bois d'essences forestières partiellement protégées, d'essences forestières de valeur économique ou d'essences forestières non protégées ayant subi des opérations de transformation préalables de deuxième ou de troisième niveau dans des unités industrielles ou artisanales autorisées à cet effet conformément aux dispositions des textes en vigueur.

Figure 6
Regulation re-affirming the national log export ban and the prohibition to export square logs from Mali

Source: MEADD, 2021



Source: Plume Libre - Mali, available at: <https://www.facebook.com/103421694999900/posts/162932709048798/>

Figure 7
Communities in the Kayes region rise against the anarchic logging of *P. erinaceus*.

CONCLUSION AND RECOMMENDATIONS

Illegal trade in *Pterocarpus erinaceus* is a problem that predates its listing on CITES Appendices III and II. Unsustainable and illegal trade has continued since the CITES listing in 2016.²⁶ In addition to being the only species considered for the Review of Significant Trade at the virtual 25th Meeting of the Plants Committee in June 2021, based on CoP Decision 18.92 and the urgent need to address unsustainable trade, the Plants Committee also referred illegal trade issues to the 74th Meeting of the Standing Committee. Due to the significant ongoing issues with legality of trade in *P. erinaceus*, EIA recommends the following to SC74:

- 1. Consolidated Article XIII review for exporters - including Mali - and importers involved in the trade since 2016.** Due to the continued widespread illegalities in the trade, the Standing Committee should request the Secretariat to undertake a consolidated Article XIII review for *P. erinaceus*, to include the ongoing compliance investigations and Article XIII reviews of Guinea, Mali, Nigeria, and Vietnam, as well as other major exporting and importing Parties (Benin, Burkina Faso, China, Gambia, Ghana, Guinea-Bissau, and Sierra Leone).
- 2. Regional trade suspension for all range States unless a scientifically robust non-detriment finding has been approved.** To respond to PC recommendation to the SC in SC74 Doc. 35.2.1 paragraph 15(b) to address illegal trade, the Standing Committee should recommend a suspension in trade of this species until exporting Parties make non-detriment findings and legal acquisition findings to ensure trade in compliance with the Convention to the satisfaction of the Plants Committee and Standing Committee.
- 3. Effective support to wildlife crime enforcement initiative in West Africa.** The SC should support draft decisions in Annex 1 and 2 of SC74 Doc. 35.3 on Wildlife crime enforcement support in West and Central Africa for consideration by the Parties at the 19th Conference of the Parties.

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