

# OPENING THE ROSEWOOD PANDORA'S BOX

Consideration of Risks and  
Impacts Associated with  
Prematurely Lifting the Trade  
Ban for SC77

October 2023

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### EIA US

PO Box 53343  
Washington DC 20009  
USA  
**T:** +1 202 483-6621  
**E:** info@eia-global.org  
**us.eia.org**

### EIA UK

62/63 Upper Street  
London N1 0NY  
UK  
**T:** +44 (0) 20 7354 7960  
**E:** ukinfo@eia-international.org  
**eia-international.org**

# SUMMARY

Research from the Environmental Investigation Agency (EIA) and the Center for International Environmental Law (CIEL) indicates that the CITES trade suspension of *Pterocarpus erinaceus* - an endangered species of rosewood found in the dry savannahs of western and central Africa - implemented since March 2022 has been effective in limiting international trafficking while improving the conservation of a threatened species. EIA and CIEL's findings clearly demonstrate that current efforts by certain countries to reopen international trade are premature. The analysis of recent trade data shows that the trade suspension of *P. erinaceus* has slowed, but not stopped, the export of the species from its range in West Africa. Evidence from the ground also shows that illegal logging and international trafficking of the species are still taking place across the region.

In this context, the request from Sierra Leone to lift the zero export quota through a "special authorization" to export stocks of 160,000 cubic meters of *P. erinaceus* in the absence of a Legal Acquisition Finding or sustainable harvest quotas raises serious concerns and would, if approved, set a dangerous precedent for the region. These concerns are even more urgent when considering the approval of the Non-Detriment Finding (NDF) provided by Mali to the Plants Committee, which in EIA and CIEL's analysis fails to meet the required standard to establish and control sustainable levels of harvest and trade.

Granting "special authorizations" for export and accepting sub-par NDFs from some countries sets a dangerous precedent and will most likely result in other countries in the region repeating the practice. Any move to relax the current suspension for one or more countries within the species' range would not only lead to an increase in the potentially illegal and unsustainable trade in the respective countries, but effectively undermine efforts to protect the species and risk re-opening the deadly boom and bust cycle of illegal logging and trade that has been well documented in the past. Once opened, the rosewood Pandora's box will not easily be closed.

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# PTEROCARPUS ERINACEUS: STILL THE PREY OF TIMBER TRAFFICKERS ACROSS WEST AFRICA

## International Trade Has Not Stopped

Due to the survival of the species being threatened by uncontrolled illegal logging and international trade, *P. erinaceus* was listed in CITES Appendix III in 2016 and subsequently in Appendix II in 2017.<sup>1</sup> Yet implementation concerns for the *P. erinaceus* listing persisted across the region.<sup>2</sup> In response, as a result of the lack of compliance with the Convention’s sustainability and legality requirements and to ensure the survival of an already-decimated species, CITES effectively suspended all trade in the species in March 2022.<sup>3</sup>

Initially, both exporting countries and China apparently failed to abide by the provisional suspension imposed in March, 2022 (Figure 1), with approximately 30,000 metric tons of *P. erinaceus* traded between West Africa and China from April through June 2022, in the immediate aftermath of the Notification to the Parties.<sup>4</sup>

The notification from the CITES Secretariat of a full suspension of trade in June 2022, appeared to trigger a rush for exports, in violation of the provisional

suspension that had already been in force for three months prior to this Notification. In July and August of 2022 alone, China imported more than 62,000 metric tons of rosewood from Sierra Leone and more than 15,000 metric tons from the Gambia. This despite the fact that the CITES Notification to the Parties issued in March should have led China and other importing parties to “reject all export permits concerning *Pterocarpus erinaceus*, based on concerns related to the sustainability and legality of the international trade in specimens of that species.”<sup>5</sup>

After this initial rush, China’s overall imports of rosewood from the region seem to have fallen significantly. Yet while this reduction represents significant progress, the trade of *P. erinaceus* from West Africa has not stopped completely. Trade data through August of 2023 indicates that more than 20,000 metric tons of rosewood have been exported from West Africa (excluding Guinea, which is allowed to export 14,000 cubic meters of pre-Convention stockpile<sup>6</sup>) to China from the fourth quarter of 2022, when the suspension would have been fully implemented.<sup>7</sup> The continued export of *P. erinaceus*, more than a year after the decision by CITES to suspend the trade, is an apparent violation of the trade suspension and points to a need to tackle ongoing regional logging and trafficking of the species in violation of CITES.

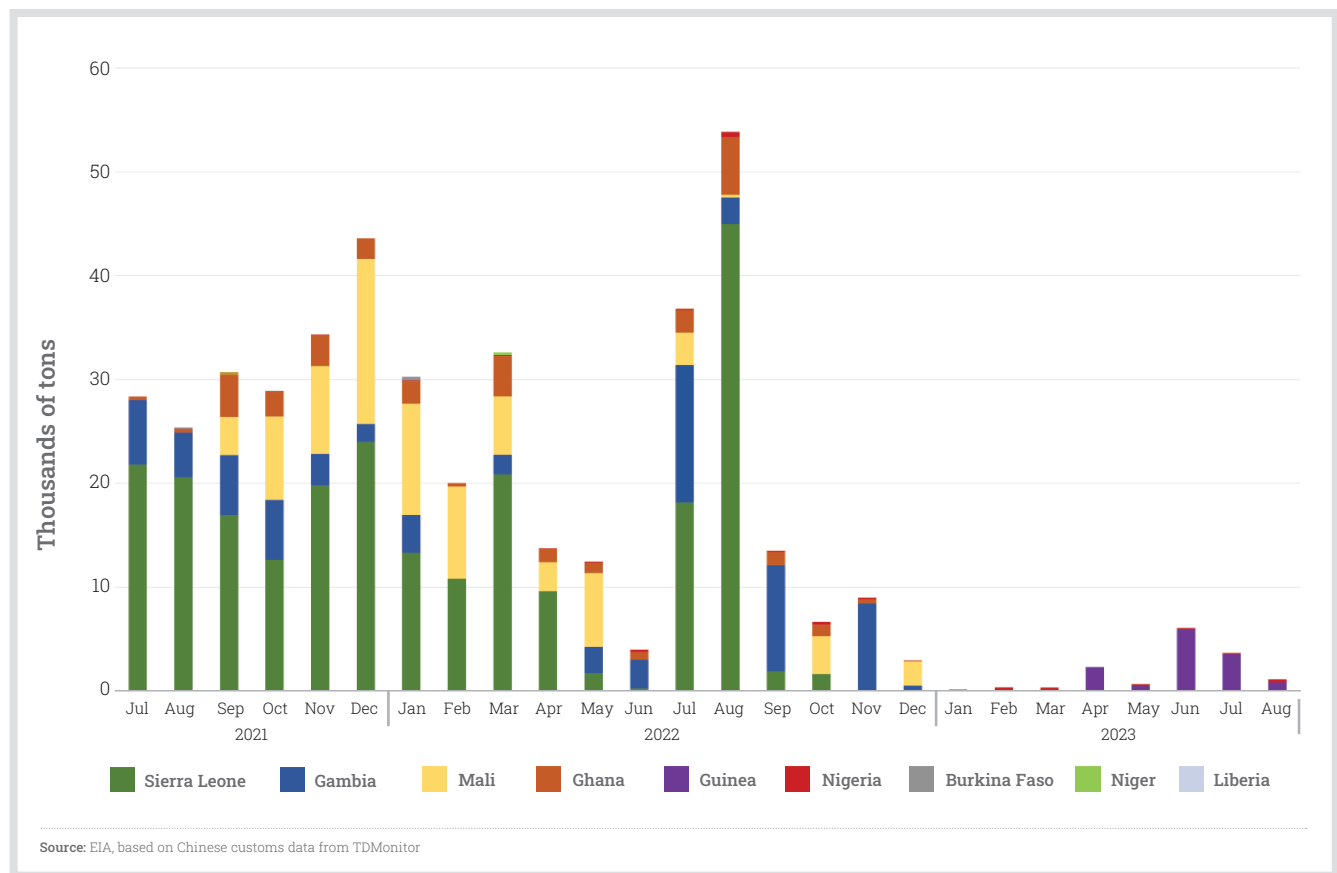


Figure 1  
Monthly import of *P. erinaceus* in China from West Africa

## Illegal Logging of The Threatened Species Has Not Stopped

The continued demand for *P. erinaceus* is met through illegal logging of the species across its range, which has been documented since the suspension of trade in March 2022.<sup>8</sup> In Mali, illegal logging continues to thrive “despite the tightening of international regulations by the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).”<sup>9</sup> In Ghana, illegal logging and trafficking of rosewood persist, as local communities complain about corruption and a lack of political will to enforce the law.<sup>10</sup> Similar issues with illegal logging since the suspension was imposed have been documented in the Gambia<sup>11</sup> and Nigeria.<sup>12</sup>

## Interdependence in Regional Trafficking Has not Stopped

According to EIA and CIEL’s research, the export of illegally logged rosewood is facilitated through national, regional, and international trafficking networks. In Ghana, recent reporting has documented how traffickers “can pay a ‘penalty’ of between 1,500 and 1,700 cedis (approximately \$123-\$140) for their seized logs” in order to obtain transport permits, often with the involvement of high-ranking forestry officials.<sup>13</sup> In Mali, reporting after the CITES suspension documented how traffickers seemingly pay forest authorities and community leaders to look the other way.<sup>14</sup> In some cases, the CITES suspension has shifted, but not stopped, regional trafficking networks. For instance, after Senegal seized a shipment of illegal rosewood, traffickers in Mali apparently shifted their exports from the port of Dakar in Senegal to Nouakchott in Mauritania.<sup>15</sup>

Despite declining trade in line with the trade suspension to protect *P. erinaceus* from illegal and unsustainable trade, Central African Republic, the Gambia, Ghana, Mali, and Sierra Leone are attempting to resume official exports, either of stockpiled timber, newly harvested timber, or both,<sup>16</sup> even though they have not yet demonstrated full compliance with NDF and LAF requirements for the protection of the species. As the Standing Committee faces requests from Sierra Leone and Mali to resume trade, it is worth considering the documents they have submitted in detail to fully understand why any modification of the suspension would be premature.

## SIERRA LEONE: WHY THE ROSEWOOD RUSH?

### A Decimated Natural Population with No Commercial Trade on the Horizon

According to the CITES trade database, China and Viet Nam reported imports of 705,961 cubic meters of *P. erinaceus* from Sierra Leone between 2016 and 2021 (including one shipment of 2,877,500 kilograms). In March 2023, Sierra Leone requested approval to export a *P. erinaceus* stockpile of 160,000 cubic meters.<sup>17</sup> Sierra Leone was one of the leading exporters of *P. erinaceus*

prior to the application of Article XIII in 2022, which stopped all legal exports of *P. erinaceus* harvested after 2017 when it was listed on Appendix II.<sup>18</sup> It appears that most *P. erinaceus* trees of commercially viable size for harvest in Sierra Leone have already been cut and exported during the recent surge of exports to China and Viet Nam. Sierra Leone’s Updated Non-Detriment Finding noted that “[t]he majority of trees have a DBH (diameter at breast height) of less than 24 cm.”<sup>19</sup>

### A Missing Sustainable Export Quota

Although Sierra Leone has submitted what they have titled the Updated Non-Detriment Finding, and requested that the Standing Committee lift the zero export quota,<sup>20</sup> important information is missing, notably the “calculation of a proposed country-specific sustainable export quota.”<sup>21</sup> As Sierra Leone is under the Review of Significant Trade for *Pterocarpus erinaceus*, the long term recommendations apply, and “[b]efore making any increase to export quotas,” Sierra Leone needs to “communicate the scientific basis for such a change to the Plants Committee, through its Chair.”<sup>22</sup> Sierra Leone’s plans to export *P. erinaceus* after the zero export quota is lifted would by definition be an increase to the export quota from zero. Thus, Sierra Leone needs to provide the basis for a sustainable export quota, if any. Currently, the information in the updated NDF does not indicate what a sustainable export quota might be. Indeed, based on field data used to prepare the draft NDF submitted prior to the 26th Meeting of the Plants Committee in June 2023, Sierra Leone noted that “commercially viable and exportable stock in most of Districts [sic] is relatively low.”<sup>23</sup>

Furthermore, in the first draft NDF, the findings, “[b]ased on the assessment standards provided by CITES on the NDF process, only twenty-two (41.5%) of the fifty-three Chiefdoms studied have positive NDF; thirty-one Chiefdoms failed the overall NDF criteria,”<sup>24</sup> indicating that any scientifically based sustainable export quota would need to be based only on the subset of Chiefdoms that have a positive NDF. Although the Secretariat has suggested that the Standing Committee recommend that the Secretariat initiate an intersessional consultation process with the Chair of the Plants Committee to review the NDF submitted by Sierra Leone,<sup>25</sup> the updated, but still draft, NDF is missing key information that should be completed and submitted to the 27th Meeting of the Plants Committee for evaluation in the context of the Review of Significant Trade.

### Warning: The Dubious Pre-Export Ban Stock

Although Sierra Leone previously requested approval to export a stockpile of 160,000 cubic meters,<sup>26</sup> in the document submitted for SC77 Sierra Leone stated that exports of the newly anointed “stocks” “would be eligible for CITES Export Permit applications once the zero-export [sic] quota is lifted,”<sup>27</sup> with no reference to any volumes. In fact, Sierra Leone’s approach to the stocks is inconsistent, as the title of the document includes “A Request for Special Authorization to Export the Pre-Zero

Export Quota Harvested Stocks of *Pterocarpus erinaceus*," but afterward no request for special authorization is made in the body of the document. Indeed, the lifting of the zero export quota and any export of stocks would be premature, as countries with voluntary zero export quotas wishing to resume international trade must also meet the NDF and LAF requirements<sup>28</sup> of Article IV, and the additional requirements for approval contained in the Notification on the Application of Article XIII.<sup>29</sup> Neither condition has yet been met. Sierra Leone has stated that "[o]ur goal is to provide a total number, volume and LAF for these pre-zero export quota harvested stocks based on using the newly minted NDF traceability systems to demonstrate their eligibility for export,"<sup>30</sup> but this also has not yet occurred.

## MALI'S NDF APPROVAL: LESSONS LEARNED FROM A SERIES OF SHORTCOMINGS

Scientifically based non-detriment findings and legal acquisition findings give meaning to species listings in Appendix II, as they create conditions for sustainable harvest. A lack of rigor either in their elaboration by a Party, or in their study by the CITES committees, would vacate the Convention of all its spirit and relevance. Unfortunately, in this case, Mali's NDF - as approved by the Plants Committee in June 2023 - fails to meet this standard.

### Shortcoming #1: Ongoing Logging and Trafficking of the Species

First, as noted above, media reporting indicates that illegal logging of *Pterocarpus erinaceus* in Mali seems to be ongoing.<sup>31</sup> The presence of illegal logging, particularly in the absence of traceability mechanisms, raises serious doubts as to whether future timber authorized for export would have been harvested in accordance with the NDF that was only approved in June or with LAF procedures which are currently under development. It is more likely that exports would come from stockpiled timber cut prior to the adoption of an NDF and LAF, or indeed illegally harvested during the trade suspension.

### Shortcoming #2: Missing Critical Context-Based Information

The NDF fails to consider a number of scientific, demographic, and social elements that are critical to the scientific and fact-informed management sought by CITES. EIA's review of the NDF finds that the determination of the annual quota is not explained, and the opinion of the scientific authority - which should be the cornerstone of the document - is absent. Furthermore, the NDF fails to account for external factors such as demographic pressures, large-scale land use changes, and demand for fuelwood, which have combined to reduce forest cover by approximately 100,000 ha per year,<sup>32</sup> reducing the range for the species. These trends are all critical to the survival of the species, and glaringly absent from the NDF. Finally, the document fails to

mention how the government of Mali will manage the more than 160,000 cubic meters stockpile of *Pterocarpus erinaceus*, which the government of Mali requested authorization to export in 2022, despite the lack of an NDF and LAF for this wood. The NDF provides no guarantee that this stockpile will not be mixed with timber harvested under the NDF and exported going forward. These factors become even more significant in view of the country's political turbulence and the weakening of management institutions<sup>33</sup> which would be tasked with managing the sustainable exploitation of the species.

### Shortcoming #3: Rushed Judgment and Contradictory Information

EIA's investigation suggests that it is unclear whether the Plants Committee's approval of the NDF submitted by Mali was based on a thorough reading of the documentation submitted. Rather, it appears that what has prevailed are cursory observations about the length of the document rather than an evaluation of the validity of the data and analysis provided therein.<sup>34</sup> The Plant's Committee's haste in approving Mali's NDF is particularly concerning when considering the fact that the quota proposed in the NDF is based on national-level inventories conducted by holders of forest concessions between 2020-22.<sup>35</sup> This raises two issues. First, forest concession holders would not be disinterested parties in the development of an inventory, and aggregating data from different concession holders would raise methodological concerns that are not addressed in the NDF. Second, as Mali's own NDF notes, "[t]he latest national forest inventories (NFI), also known as reconnaissance inventories, were conducted in Mali in 2014." By the admission of the NDF, the last reliable national-level inventory would have been conducted in 2014, meaning that these figures necessarily could not have accounted for either the unsustainable exploitation of *P. erinaceus* in the intervening years that led to the imposition of the current trade suspension, or the demographic and land use changes noted above. The use of such inconsistent data across the same NDF should have given the Plants Committee pause. For reference, China has reported the import of more than 430,000 tons of rosewood from Mali from between January 2015 and August 2023, equivalent to approximately 625,000 standing trees.<sup>36</sup> These findings all suggest that the production, review, and approval of Mali's NDF for *P. erinaceus* was rushed, rather than considered.

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**The document fails to mention how the government of Mali will manage the more than 160,000 cubic meters stockpile of *Pterocarpus erinaceus*.**

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## CONCLUSION AND RECOMMENDATIONS

The *P. erinaceus* Article XIII proceedings initiated in 2022 would not be effective without the regional scope, which simultaneously blocked cross-border timber movements and required China and other importers to halt imports from countries in the region.<sup>37</sup> As seen from harvesting driving commercial extinction in one country, exploitation simply shifts to other countries, highlighting the importance of a regional approach.<sup>38</sup> Nigeria's inclusion under Article XIII in 2018 reduced its exports, but also seemingly prompted traffickers to increase pressure in other countries such as Ghana, the Gambia, Sierra Leone, and Mali from 2019 to 2022.<sup>39</sup> Although imports by China have dropped significantly since the initiation of the *P. erinaceus* Article XIII proceedings, they have not stopped entirely. This ongoing trade, potentially in violation of the Convention, coupled with unwieldy issues of stockpiles, require a coordinated and comprehensive approach from the CITES Standing Committee. Finally, lifting of a trade suspension in one or more countries without first securing and completing inventories of any stockpiled timber or timber harvested during the trade suspension without both NDFs and LAFs would be premature. Recommencing trade would not only authorize trade potentially in violation of the Convention in those specific countries, but would also increase illegal harvest and cross border smuggling in others, undermining the significant efforts and financial resources of CITES Parties to prevent the extinction of *P. erinaceus*.

### **In this context, the Standing Committee should recommend the following:**

- Remind Parties that all range States currently have a zero export quota or recommendation to suspend trade under Article XIII, and that consequently any imports from these Parties are in violation of the Convention.<sup>40</sup>
- Recommend Parties verify any re-exports have both NDFs and LAFs and confirm that re-exporting Parties are not subject to a recommendation to suspend trade.

### **NDFs and LAFs**

- Remind Parties that the SC cannot lift zero export quotas or trade suspensions and that the conditions set out in Notification No. 2022/045 for NDFs and LAFs must first be fulfilled.
- Commend the proposed workshop for range States outlined in paragraph 66 of SC77 Doc. 33.2.3 as an initial step towards meeting the NDF and LAF needs of range States, and that additional support is still needed.
- Recommend that any countries undertaking NDFs follow the guidelines in Resolution Conf. 16.7 (Rev. CoP17) on Non-detriment findings and Resolution Conf. 14.7 (Rev. CoP15) on Management of nationally established export quotas, and develop country-specific sustainable export quotas that include detailed information on calculation of the quota.
- Recommend that any countries undertaking LAFs follow the guidance in Resolution Conf. 18.7 (Rev. CoP19) on Legal acquisition findings

### **Stockpiles**

- Request range States to secure and inventory stockpiles of *P. erinaceus*, in order to ensure that stockpiled timber without NDFs or LAFs is not mixed into future exports of newly harvested timber with NDFs and LAFs;
- Encourage range States to work with the Secretariat on development of NDFs and LAFs specifically for any future exports from stockpiles, which should not be exported within quotas developed under NDFs for management and new harvest of *P. erinaceus* in the wild; and
- Recommend development of guidance on management and controls of stockpiles of timber tree species outlined in SC77 Doc. 50.

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environmental  
investigation  
agency

**EIA US**

PO Box 53343  
Washington DC 20009 USA  
T: +1 202 483-6621  
E: [info@eia-global.org](mailto:info@eia-global.org)  
[us.eia.org](http://us.eia.org)

**EIA UK**

62-63 Upper Street,  
London N1 0NY UK  
T: +44 (0) 20 7354 7960  
E: [ukinfo@eia-international.org](mailto:ukinfo@eia-international.org)  
[eia-international.org](http://eia-international.org)

