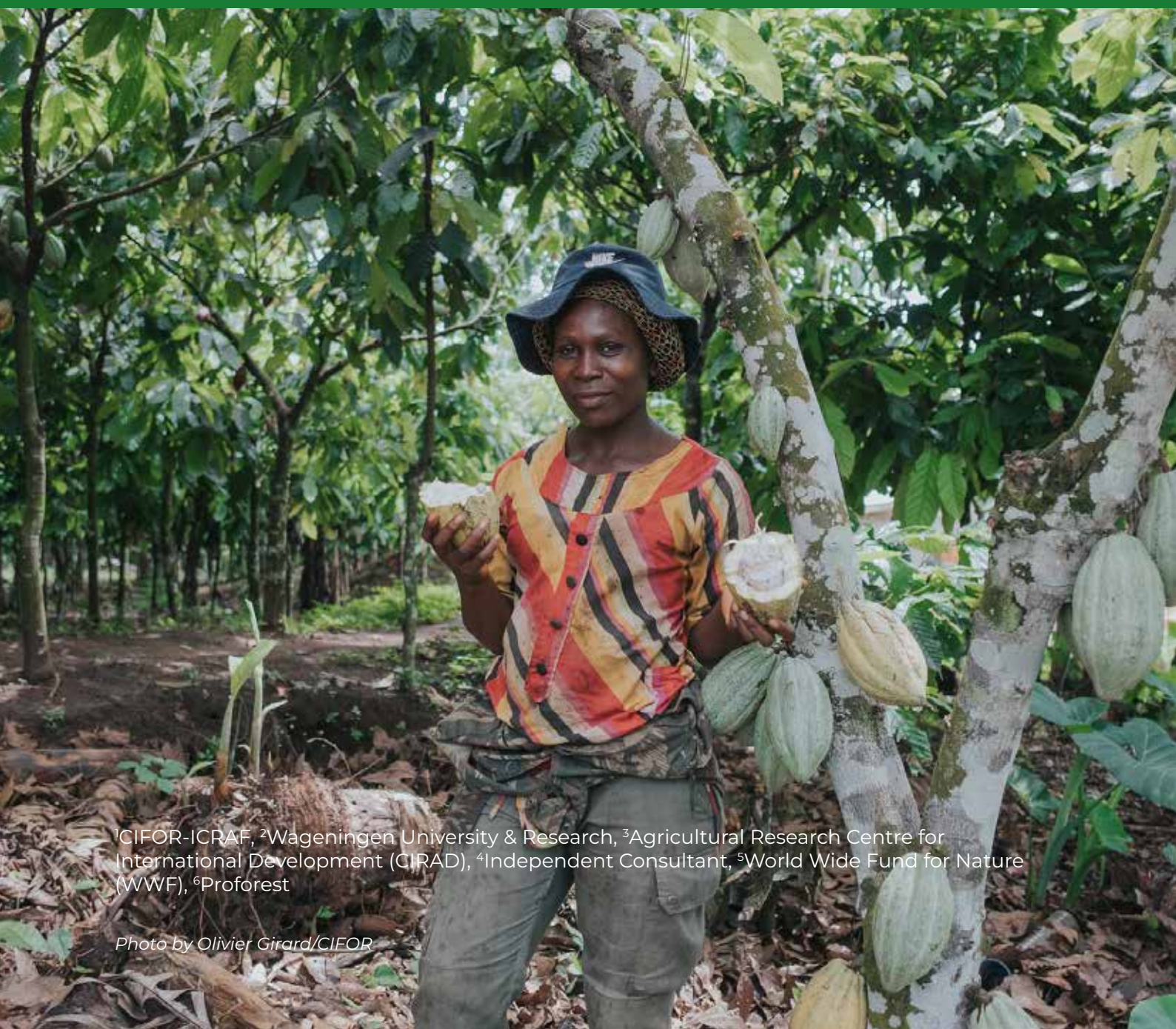


Addressing imported deforestation and zero deforestation commitments

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Photo by Olivier Girard/CIFOR

Introduction: The challenges of zero and imported deforestation

Over a quarter of deforestation (27 percent) is caused by land use change attributed to the production of commodities (Curtis et al. 2018). Estimates of tropical forest lost attributed to expanding cropland, pastures and forest plantations range from between 62 to 80 percent (Pendrill et al. 2019, Hosonuma et al. 2012) with 26 percent of tropical forest loss attributed to the international demand for commodities (Pendrill et al. 2019). Deforestation has thus been seen as a worldwide responsibility, since products linked to deforestation in a specific location are sold and consumed worldwide. It has been estimated that 10 percent of deforestation is linked to the consumption of unsustainably sourced commodities within member countries of the EU, caused by imported commodities since deforestation within Europe is negligible (Cuypers et al. 2013). This phenomenon results in what is currently known as *forest-risk commodities* and *commodity-driven deforestation*. Commodities associated with imported deforestation produced in Central Africa are palm oil, cocoa, coffee, natural rubber, timber and cotton.

The concept of “*zero deforestation*”, which implies that no forest areas are cleared or converted to other land uses, originated at the end of the 2010s. Civil society organizations began linking the production of agricultural commodities entering international trade - such as palm oil, soybeans, paper and cocoa - with deforestation, and pressuring large companies producing these commodities to eliminate deforestation from their value and supply chains.

The similar term “*imported deforestation*” is defined as the production of imported agricultural goods that drives tropical deforestation. A considerable share of agricultural commodity production intended for export results in countries such as those in the European Union (EU) “importing deforestation” (IDDRI 2017) as imports of raw materials or processed products whose production has contributed, directly or indirectly, to deforestation, forest degradation or the conversion of natural ecosystems outside the national territory (Gouvernement France 2017).

Direct drivers include the production and extraction of commodities when production involves land-use change and so directly affects forest cover.

Focusing on direct drivers in decision-making process and policy design – shown in Figure 8.1 – can be pragmatic but can limit the vision and the success of policy implementation, and needs to be contextualized within debates about indirect drivers, commodity value chains and their impacts. *Indirect drivers* of deforestation include multiscale social, economic, political, cultural and technological processes affecting commodity production and extraction (Kissinger, Herold, and De Sy 2012; IPBES 2018).

National economies in Central Africa exhibit little diversification and are heavily dependent on the export of agricultural commodities and mining products. Strategies to combat imported deforestation, most of which are designed by importing countries, therefore risk negatively affecting the development trajectories planned and implemented by countries in the subregion, if due care is not taken. While strategies to combat imported deforestation are expected to have positive environmental impacts on forest ecosystems in Central Africa, their potential socioeconomic impacts on the region's people and governments are less well understood. Commodities like cocoa, whose production involves hundreds of thousands of small farmers, are of particular concern.

This chapter aims to better inform stakeholders in the value chains of the Central African products affected (palm oil, cocoa, coffee, wood, rubber and cotton) about ongoing efforts to combat imported deforestation and their current and potential impacts. It also explores the feasibility of different approaches to implementing strategies to combat imported deforestation in Central Africa.

8.1 Technical concepts related to zero deforestation and imported deforestation

Debates around zero and imported deforestation embrace diverse disciplines and concepts which use different terms and methodologies, leading to diverse definitions. The main concepts used here are defined below (see also Chapter 1).

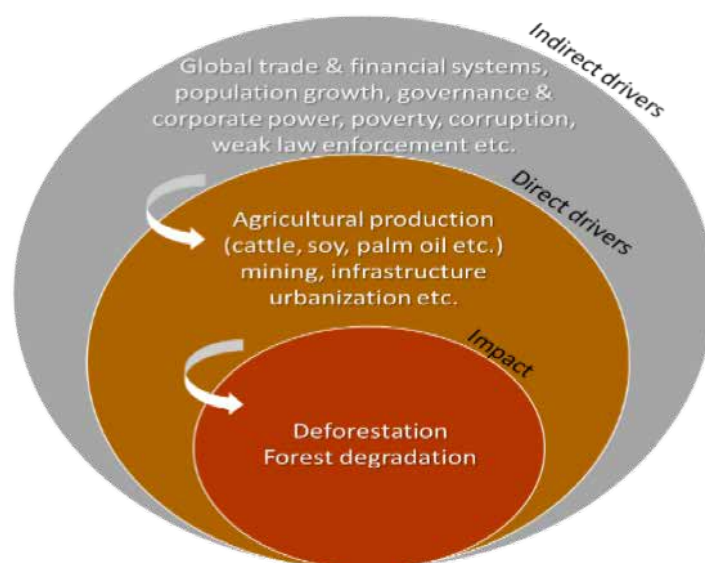


Figure 8.1: Direct and indirect drivers of deforestation and forest degradation

Source: Ingram et al. 2020b

8.1.1 Defining forests and deforestation

In the sense often used by the Food and Agriculture Organization (FAO), a forest is not necessarily a forest as we might ordinarily understand it; rather it is the carbon stock and a set of environmental services (see also Chapter 1).

Since its creation in 1945, the FAO has carried out a Forest Resource Assessment every 10 years and since 2000, every 5 years. Given that definitions of ‘forest’ differ over time and by location, the FAO has developed its own definitions over the years. It eventually adopted a single definition based on the 2000 Forest Resource Assessment, which it still uses today. This definition has been adopted by several stakeholders.

It is based on four variables: (1) the percentage of the ground area covered by the projection of the tree crowns (canopy cover); (2) the minimum area used to calculate this percentage; (3) the minimum width of the area used to calculate this area; 4) the minimum height of the trees (in adulthood). According to the FAO definition, a forest must have: a canopy cover of 10 percent (previously 20 percent for forests in Western countries) over at least 0.5 ha, with a minimum width of 2 m, and a minimum adult tree height of 5 m (Gold 2003).

Other definitions are however used at the international level. The United Nations Framework Convention on Climate Change (UNFCCC) definition was adopted in 2001 as part of the Marrakesh Accords on the Clean Development Mechanism (CDM). This definition is based on ranges rather than specific values for three of the four variables: canopy cover of 10–30 percent over at least 0.05–1.0 ha, with a minimum tree height of 2–5 m (UNFCCC 2002).

The EU definition (Joint Research Centre – JRC) was adopted as part of the Global Land Cover 2000 project. It is based on remote sensing and specifies that forests must have: canopy cover of at least 15 percent and a minimum tree height of 3 m. This definition has been relaxed in later work by the JRC, which claims to use a ‘flexible’ interpretation of the UNFCCC definition (subject to technical constraints). A team from the University of Maryland working with remote-sensing data has developed a configurable tool that allows users to measure the area covered by tree formations depending on the percentage tree cover required by their chosen definition of forest.

In parallel, many countries have adopted their own definitions. A 1999 compendium listed 69 countries that had quantified one of the four variables used by the FAO. By 2011, a further 16 countries had adopted a definition of forest and 10 had either refined or modified their existing definitions. Since 2007, countries wishing to participate in the UN REDD+ process have been required to adopt a national definition of forest (COP13 2007, Bali Action Plan). To date, 58 countries have signed up to the process and around 20 have adopted a quantified definition for the first time. Another 30 or so have reviewed and/or modified their definition, while the rest are still deliberating. In Central Africa, only four countries have defined their forests (Cameroon, the Democratic Republic of the Congo (DRC), Equatorial Guinea and the Republic of the Congo), with the remaining seven countries still deliberating.

The numerous challenges.....

Depending on the definition used by an organization or a country, a forest might be physically present when the data is collected (‘land cover’) or physically absent, but counted in an area legally designated as forest (‘land use’), making comparisons difficult. Even when a clear definition has been established, forest cover estimates for a given country can vary widely depending on whether

they are primarily based on forest inventories conducted on the ground, satellite imaging or a combination of the two.

Oil palm plantations are usually excluded from these definitions, as (to a lesser extent) are most tree plantations whose primary purpose is to produce a commodity other than wood, such as cocoa or rubber. Nevertheless, the area they cover is sometimes included as forest area, because it is difficult to distinguish on the satellite imagery widely used to support or replace field inventories.

This satellite imagery provides highly variable information depending on its spatial resolution, the spectral bands used by the sensors, the spectral indices that they make it possible to calculate and analyse, and the time series available.

... make it difficult to define and quantify deforestation. So what is deforestation?

The ambiguities that cloud the definition of ‘forest’ find their parallels in the definition of ‘deforestation’. Indeed, deforestation can only be quantified with careful reference to the chosen definition of ‘forest’ and the method used to estimate forest area. Deforestation as estimated by the FAO for each country will not match that estimated by the University of Maryland using satellite data, nor indeed that estimated by the approximately 75 percent of countries whose national definition differs from the FAO’s.

It is especially important to consider the concepts of ‘land cover’ and ‘land use’. Taking a land-cover approach, deforested describes an area from which the forest has disappeared, regardless of the reason. This could be due to clear-cutting followed by the establishment of a new tree plantation or farmland, or due to the natural disappearance of the forest after a storm, which will be followed by natural regrowth. Following the land-use approach, using the same examples, only land on which an agricultural crop has actually been planted would be classed as deforested. However, land that is still covered with forest may also be described as deforested, if its land-use designation has changed and it is explicitly destined to be transformed into farmland or a built-up area. The land-use approach is also tied up with questions around the existence and demarcation of permanent and non-permanent forest domains, and issues related to legal and illegal logging. While legal logging in the permanent or non-permanent forest domain might not be considered deforestation, illegal logging would be considered deforestation, except perhaps in the non-permanent forest domain.

‘Gross deforestation’ and ‘net deforestation’ are two more key concepts in discussions on deforestation. Gross deforestation describes the area of forest cover that has disappeared, whereas net deforestation refers to the (negative) difference between the forest area destroyed each year and the forest area planted or that naturally grows. Reducing net deforestation will certainly have a positive impact on forest carbon stocks, but will not prevent biodiversity loss. Current discussions aimed at achieving “zero imported deforestation” in countries producing and consuming products like soybean, palm oil, cocoa, rubber, beef, wood or paper pulp tend to focus more on net deforestation, whereas, ecologically speaking, gross deforestation should be of greater concern.

Towards a standardized definition?

Each country currently uses its own definition of forest (and therefore of deforestation) to justify and quantify its international commitments, without any real consideration of their ecological relevance. The four Central African countries that have adopted their own definition of forest have not opted for the same rules, despite their forest formations being very similar in terms of their structure and

floristic composition. The same intensive logging activities might be termed deforestation in DRC, but only degradation in Cameroon, with different consequences for the countries' deforestation statistics and the funding mobilized in response.

Adopting a standardized definition based on the recognized ecological characteristics of these forests should be a priority for the region, where population growth is increasing demand for farmland. Considering the risk to exports to countries committed to zero deforestation, the Economic Community of Central African States (ECCAS) deemed this a matter of urgency and, in 2021, the ECCAS secretariat organized a regional discussion workshop on the definition of the terms 'forest' and 'deforestation'.

8.2 Commodities driving deforestation in Central Africa

Currently, coffee, cocoa and cotton are the main export crops that continue to be linked to imported deforestation from Central Africa, and whilst palm oil is not a major export crop, its production in mono-plantations is associated with deforestation. The following short descriptions show how these cash crops are associated with significant, historical deforestation and continue to embody imported deforestation. The increased production of timber, cocoa, coffee and rubber is expected, in both large scale and smallholder systems, which given previous trends and current land use, is expected to take place in lowland, moist forest zone, and cause deforestation directly and indirectly.

8.2.1 Timber

Timber is both an export and domestic commodity, with the majority of tropical hardwood in Central Africa currently extracted from natural forests and forest concessions (Nasi, Billand, and van Vliet 2012; de Wasseige et al. 2014). In this section the focus is on planted timber as an agro-commodity. In colonial times, large-scale planted timber plantations were developed on savannahs around Pointe-Noire in Congo (Feintrenie 2014) and in Cameroon (Kollert and Cherubini 2012). Since the 1990s there has been renewed interest and national and international investment in timber plantations for wood and as carbon sinks for the carbon market in **Cameroon** (Ayous in Batouri, teak in Bazzama), **Congo** (eucalyptus in Brazzaville and EFC in Pointe Noire), **DRC** (acacia in Goma and plateau Bateke) and **Gabon** (Rougier/Lignafrique/Okume in Plantations Forestières de la Mvoum), mainly on degraded and already deforested land, and as part of afforestation programs (Marien and Gourlet-Fleury 2006; Hawkins and Wigglesworth 2018). Stable timber production is expected from the region in general.

8.2.2 Palm oil

Palm oil has been produced for centuries in Central Africa from the indigenous oil palm (*Elaeis guineensis*), primarily for domestic consumption. Oil palm plantations cover less than 0.5 million ha, mainly located in the DRC, Gabon and Cameroon. Oil palm grown in agroforestry systems is not included in these figures. In plantations, productivity is quite low: the highest rates in Cameroon are around 14 tons of fruit per hectare and 6 t of oil per ha, compared to average productivities of 16 to 18 t of fruit per ha in Asia¹ (FAOStat 2021). The main palm oil exporting countries are the DRC, Gabon,

¹ <https://www.fao.org/countryprofiles/index/en/?iso3=CMR> accessed June 2021

Cameroon. Gabon and Cameroon export to Europe, and to West African countries Côte d'Ivoire and Benin. Regional production does not meet demand, shown by the import volumes with CEEAC countries (COMIFAC plus Angola) being net importers of palm oil: in 2018, they exported 19,000 t and imported 375,000 t mainly from Malaysia and Indonesia. **Gabon** is a net importer of palm oil from Malaysia and Indonesia and over time it has imported less and exported more. In 2018, Gabon exported 7,200 t and imported 8,900 t of palm oil. The size of plantations in Gabon have increased over the past decade and it is possible it will become a net exporter in the future. In 2018, Cameroon imported 31,700 t of palm oil from Southeast Asia and exported 3,700 t to Europe. **Cameroon's** palm oil production is insufficient for its domestic needs. In Cameroon, industrial scale production started around 1907 under German colonization in Littoral region. Today, production continues with a large agro-industrial sector and milling, smallholders in contract with agro-industries and traditional, artisanal independent smallholders with family farms, and rural and urban investors in rural plantations. Smallholders with less than 5 ha of oil palm represent over 75 percent of oil palm growers but account for less than half of national production due to very low yields. However, national production is insufficient to cover domestic consumption. The government considers the oil palm sector (both artisanal and industrial) as important to alleviate poverty and to generate national revenues (Lyabano et al. 2014). The **DRC** is also net importer of palm oil, importing 47,600 t and exporting 6,300 t to Burundi and Uganda, its neighbors and probably also to Rwanda. But cross-border statistics are imprecise and highly likely underestimated. Increased production is expected in the region generally.

8.2.3 Cocoa

Cocoa is mainly an export crop, cultivated in **Cameroon**, the **DRC**, **RoC**, and **Gabon** since the late 19th century, with larger colonial, larger scale plantations developed directly from forested land in the 1920s and 1930s (Battini 1999; Kaberry 2005; Wessel and Quist-Wessel 2015). **Cameroon** has long been and is currently the main Central African producer, exporting mainly to Europe via the Netherlands. Productivity at 416 kg/ha is the best in the Central African region, but is lower than Ghana (549 kg/ha) and Côte d'Ivoire. Cameroon's objective to increase production from 300,000 to 600,000 tons by 2020 was postponed to 2030 as it was not achieved. As yields per hectare have remained stable, the prospect of expansion into forest areas in response to government and partners support programs is likely. However, except for Cameroon, the cocoa export trade from Central Africa faded into insignificance after independence and has been subject to boom-bust-boom cycles. When coffee growers in **DRC** were hit by disease, many such as ESCO in Eastern DRC switched to cocoa in the 1980s. The Association of Cocoa & Coffee Exporters ASSECCAF estimates that North Kivu and Ituri (estimated 50,000 ha) is now the main cocoa region, with 15,000 ha from Equateur and Bas Congo, where yields vary from 500 to 1,200 kg/ha. Exports have grown from 600 tons in 2000 to 10,000 in 2015, although production maybe higher than official figures, at around 35,000 tons due to smuggling to Uganda where export taxes are lower. Most DRC cocoa is double certified UTZ and organic, or aimed at fine flavor markets via traders such as Olam and specialty chocolate makers such as Theo Chocolate, Japanese Tachibana, Elan RDC and Original Beans. DRC has no large scale grinding capacity, with most exports via Kenya to Switzerland, Belgium and growing US and Asian markets.² A few companies, such as Original Beans, produce chocolate in country. In **Gabon**, after independence, the sector was neglected in favor of higher income generating extractive industries. In 1970 over 6,000 tons of cocoa were produced, decreasing to 1,920 in 1990 and by 2010 to 370

2 <https://www.reuters.com/article/us-cocoa-congo-chocolate-factory-idUSKBN2425A8>

tons.³ Industrial plantations were introduced in the 1980s. Since then production has been steady at around 500 tons. The decrease in oil prices around 2014 led to an economic diversification strategy, with the Stabilization and Equalization Fund (CAISTAB) investing USD 8.63 million/EUR 7.63 million since 2017 in restarting abandoned cocoa plantations and training new cocoa growers via the Jeunes Entrepreneurs Café-Cacao (Young Coffee and Cocoa Entrepreneurs). In 2018, sales and exports of cocoa fell 38.7 percent and 40.3 percent respectively, despite increased production of 21.2 percent to 115 million tons.⁴ With the corona crisis, CAISTAB has sought to protect growers by setting a national purchase price.⁵ Global food manufacturer Nestlé has been purchasing Gabonese cocoa via traders since the 2000. Local entrepreneurs and diaspora increasingly produce and export small quantities of specialty chocolate, such as Julies Chocolate. In **Sao Tomé**, cocoa is the nation's largest earner accounting for 79 percent of total exports, with cocoa and cocoa preparations exported to Gabon. Production has decreased from a peak in 2013 of USD 20 million to USD 6 million in 2019 (United Nations COMTRADE database).⁶ Increasing cocoa production is expected in most countries.

8.2.4 Coffee

Coffee is primarily an export crop in Central Africa, with some domestic consumption. Around 1 percent of the global coffee (Robusta and Arabica beans) production comes from Central Africa (OCDE 2007). Coffee was introduced in colonial run plantations in the DRC, Congo, Gabon and Cameroon (Clarence-Smith and Topik 2003). All Central African countries produce some coffee except Chad. Small countries like **Rwanda** and **Burundi** hold a relatively important place among the region's coffee exporters. In 2010, **Cameroon** was the region's main coffee exporter, accounting for about 2 percent of global production in 2015 and producing around 32,000 tons in 2015 (Conseil international du Café (ICC) 2015), since then exports have plummeted, exacerbated since 2017 by the conflict in the Anglophone regions. In the **DRC** coffee production was nationalized in the 1970s, and by the early 1980s, coffee was DRC's second-largest export after copper, with coffee production coordinated under the state Office National du Café (ONC). Production peaked in the 1980s with around 250,000 tons and declined significantly in the 1990s due to conflict and instability, a transition to small holder systems, liberalized market and lack of government support, with around 120,000 tons of Robusta a year produced in the mid-'90s (Cafe Imports Europe 2021), accounting for about 1.8 percent of global production in 2015 (Conseil international du Café (ICC) 2015). Export focused production now occurs in the North and South Kivu, and some traditional production in Kongo Central, Equateur, Kasai and Ituri. About 250,000 coffee farmers produce around 600 tons of Robusta and arabica in mainly smallholder farming systems with varying amounts of shade and intercropping, selling largely to specialist coffee buyers and roasters, some larger scale buyers such as Starbucks (Wilkins 2019) and unrecorded exports to neighboring Uganda and Rwanda (Cafe Imports Europe 2021). An unknown quantity of coffee has been certified since around 2010 under VSS such as organic, UTZ and Fairtrade (Cafe Imports Europe 2021). In 2012, the government launched the Strategy Document for the Recovery of the Coffee Sector 2011–2015 with USD 100 million earmarked in South Kivu province. The private sector has lobbied for looser regulations and market liberalization (Coffeehunter.com 2021). In the **CAR**, internal conflict and the covid pandemic have dramatically decreased production of coffee, one of the country's major

3 <https://ressources-magazine.com/focus-en/gabon-breathing-new-life-into-the-cocoa-sector/>

4 <https://www.cairn.info/revue-geoeconomie-2014-3-page-85.htm>

5 <https://cemac-eco.finance/cocoa-and-coffee-farmers-in-gabon-reassured-of-good-prices-despite-coronavirus-shocks/>

6 <https://tradingeconomics.com/sao-tome-principe/exports/gabon/cocoa-cocoa-preparations>

export products⁷, accounting for about 0.5 percent of gross domestic product in 2010, down from 1 percent in 2000 (Conseil international du Café (ICC) 2015). In general, stable or slightly increased production is expected, among these producing countries.⁸

8.2.5 Cotton

Cotton is produced mainly in smallholder farms, as a cash crop combined with other crops and economic activities in degraded savannah forest areas of the region, and is largely exported. There was a large increase in the land area planted with cotton in Central Africa from 1960 to 2009 mainly in response to market liberalization, falling global yields and to maintain incomes due to the long term downward price trend on international markets (Hussein 2005) and climate change negatively affecting production. **Cameroon** now exports to China, and **Chad** to Turkey. The **CAR** produces some cotton but conflict and the covid pandemic have dramatically decreased production.⁹ Before 2005, Central African countries exported to Europe and Asia, thereafter mainly to Asia. The decline in Cameroon's cotton exports in 2018 was quite steep, and the decline in **Chad** slower, producing around 200,500 tons in 2015. It is not expected that cotton production will increase from the region.

8.2.6 Rubber

Wild or **red rubber** (*Landolphia*, *Funtumia*, etc.) exports experienced a boom in the 1880s particularly in **DRC** followed by a massive drop, as wild resources became over-exploited (Gewald 2006). In 1940s, wild rubber for industrial use and export recommenced and **rubber** (*Hevea brasiliensis*) plantations started in Gabon, Central African Republic, DR Congo and Cameroon. In **Gabon**, despite intercropping experiments (Enjalric and Ngoua Assoumou 1998) most rubber is grown in large scale plantations by government and private companies, with a tendency the region towards privatization of state plantations and joint ventures (Assembe-Mvondo et al. 2016). Prices and expansion in the 1970s were halted by the 1980s financial crisis, and in the 2000s Asian investment became more prominent. In **Gabon** international trader Olam has been active since 1999 and engaged in joint ventures with the government in 2012. In the South, Centre and southwest regions of **Cameroon**, production is dominated by two private agro-industrial entities Hevecam (54,000 ha) and Sudcam (45,000 ha), both owned by Halcyon, with expansion in the Sangha region associated with deforestation (Orozco and Salber 2019; Seale 2019; Assembe-Mvondo et al. 2016). In 2017, 53,000 tons of natural rubber were produced from Cameroon.¹⁰ In Cuvette in **Republic of Congo**, the expansion of plantations in the 1970s and the last decade is linked to deforestation (Orozco and Salber 2019; Seale 2019; Assembe-Mvondo et al. 2016). In the **CAR**, rubber production has steadily increased since a dip due to the financial crisis, to 1200 tons in 2019 (FAOStat 2021).¹¹ Rubber production in the region is expected to increase slightly.

7 http://iaco-oiac.org/sites/default/files/docspage/seudieu-session_2-women_youth-iaco.pdf et <https://www.worldbank.org/en/news/press-release/2020/11/30/perspectives-economiques-en-republique-centrafricaine-diversifier-leconomie-pour-renforcer-la-resilience-et-favoriser-la-croissance>

8 <http://www.ico.org/>

9 <https://www.worldbank.org/en/news/press-release/2020/11/30/perspectives-economiques-en-republique-centrafricaine-diversifier-leconomie-pour-renforcer-la-resilience-et-favoriser-la-croissance>

10 <http://www.rubberstudy.org/Cameroun>

11 <https://www.tilasto.com/en/topic/geography-and-agriculture/crop/natural-rubber/natural-rubber-production-quantity/central-african-republic>

8.3 Initiatives taken by Central African countries to combat deforestation

Faced with this new situation, stakeholders involved in the production and export of forest-risk commodities have taken steps to mitigate the impact of anti-deforestation initiatives on their operations. In counterpoint to this needless controversy, citizens and consumers in the global North are making their own demands, as demonstrated by European countries through the Amsterdam Declaration.

It is extremely reductive to present this initiative as a threat to development in the global South. Deforestation also poses an existential threat to local communities (e.g. ecosystem services, including water and food). These measures, which often involve different types of actors (government, NGO and private sector), range from participation in anti-deforestation initiatives to promoting certification, and from awareness raising to capacity building and regulatory measures.

8.3.1 Central African discourses and public policies on commodity-driven deforestation

To understand the past, current and potential future impacts of imported deforestation and zero-deforestation commitments and initiatives in COMIFAC¹² and Central African countries, we must first consider how farmers, the public and private sectors, and NGOs define imported deforestation and zero deforestation in relation to commodities and their value chains.¹³ This can be seen in the public discourses different actors use. A discourse is “an ensemble of ideas, concepts, and categories through which meaning is given to social and physical phenomena, and which is produced and reproduced through an identifiable set of practices” (Hajer 2006). Different actors have different views on if, and how deforestation is caused, if deforestation is a problem and if so, which approach can be used to solve the problem. These discourses shape the approaches actors such as governments, business and NGOs use and justify in their “theory of change” or “impact logic”, i.e., why they prefer a certain approach. These determine the interventions they make on the ground, and resulting expected outcomes and long-term, high level impacts of these interventions. The main approaches are described in Box 8.1.

A summary of the impact logics - showing outputs, outcomes and anticipated impacts - for different approaches used in commodity chains perceived to drive deforestation in the Congo Basin, is shown in Figure 8.1.

Shown in Table 8.1, globally six main discourses have been identified driving the approaches and interventions used in forest-risk commodity value chains (Ingram et al. 2020a). In Central Africa, four different discourses can be recognized. Multi-stakeholder initiatives that involve most relevant stakeholders play an important role in reproducing discourses by referring to a common goal and strategy. Discourses are often interrelated and combined together by commodity trading companies.

¹² COMIFAC Member States: Burundi, Cameroon, Central African Republic, Chad, DRC, Equatorial Guinea, Gabon, Republic of the Congo, Rwanda and Sao Tome and Principe.

¹³ The term ‘value chain’ is used in preference to ‘supply chain’, as value chain emphasizes the value that can be built into chains (Ingram 2014).

8.3.2 Initiatives by COMIFAC Member States

To better position themselves to combat ‘illegal’ deforestation linked to the production of agricultural and forestry commodities, Congo Basin governments have signed up to several bilateral and multilateral forest protection initiatives. For timber, these initiatives include Voluntary Partnership Agreements (VPAs) under the EU Action Plan for Forest Law Enforcement, Governance and Trade (FLEGT), the Central African Forest Initiative (CAFI) and the Tropical Forest Alliance (TFA). The Republic of the Congo (2010), Cameroon (2010) and CAR (2011) have signed VPAs with the EU while Gabon and DRC are currently negotiating a similar partnership framework with the EU. These agreements are at various stages of implementation in those Congo Basin countries that have

Box 8.1: Main approaches used to tackle deforestation by actors in Central Africa

1. **Regulatory** - state regulations and government policies governing commodity value chains and the landscapes which the commodities originate from
2. **Landscape & jurisdictional** – refer to initiatives at a scale that match administrative boundaries of local, regional, sub-national or national governments in commodity producing countries or production and ecosystem areas. These approaches tend to cover actors at different stages of one commodity chain, with producers most widely represented numerically.
3. **Voluntary sustainability standards (VSS)** - standards to which producers voluntarily adhere, requiring them to improve their production practices across a variety of sustainability indicators, used in all stages of commodity value chains, such as FSC and PEFC (timber, rubber), RSPO (palm oil), Better Cotton Initiative (cotton), Rainforest Alliance, Organic and Fairtrade (coffee, cocoa, cotton) and the Global Roundtable for Sustainable Beef (GRSB).
4. **Corporate pledges** - corporate social responsibility, self-regulation and declarations, whereby a business (or association thereof) pledges and then monitors and ensures active compliance with the spirit of the law, ethical standards, and national or international norms on CSR. These include actions that appear to further a social or environmental goods beyond the interests of the firm(s) and what is required by law. Often in the trading, manufacturing and retailing stages of value chains.
5. **Public-private partnerships (PPPs)** - Platforms, networks, associations, partnerships and agreements between private sector and public sector, and often also research, civil society (CSO), and non-governmental (NGO) organisations collaborating on a common goal of sustainability with a declared policy or programme and plan of action. Many PPPs include governments in producer and consumer countries, and large companies in trading, manufacturing and retailing stages of value chains.
6. **Due diligence mechanisms** - include individual and joint actions, investigations or the exercise of care by companies to avoid committing an offence. The offence may be due to a legal obligation or a voluntary initiative on taking responsibility in chains. These include traceability mechanisms, third-party campaigns and investigations, voluntary disclosure initiatives and moratoriums – which commonly occur at the supply and consumer ends of commodity chains.

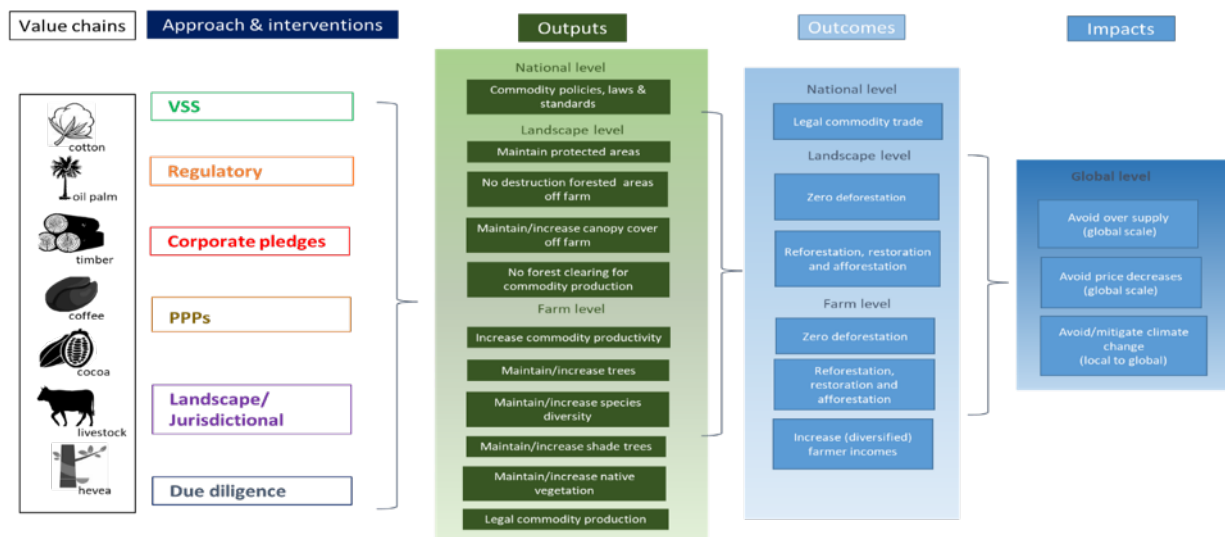


Figure 8.2: Impact logic of zero-deforestation approaches applied to Congo Basin commodity value chains

Source: Ingram et al 2020

signed them. Finally, on the economic front, Congo Basin countries are striving – more so now than before – to diversify the destination of the wood they export. Consequently, over recent years, timber exports from the subregion to China, countries in South Asia (e.g. India and Vietnam) and the Middle East¹⁴ are gaining momentum, in particular at the expense of EU countries. It should be noted that apart from tentative efforts to organize the domestic timber market, such as in Cameroon, virtually nothing has yet been done by signatory states to alleviate the problem. Efforts have also been made to raise awareness and build stakeholder capacity as regards the characteristics and requirements of FLEGT VPAs (awareness-raising and capacity building on procedures and traceability, for example).

On the economic front, countries in the subregion appear committed to reducing their log exports and promoting more advanced local wood processing¹⁵ (second and third-stage processing), thereby generating more added value. Moves in this direction include the recent (September 2020) decision by Central African Economic and Monetary Union (CEMAC) Member States to ban log exports from 2022 and to launch special economic zones for wood processing, such as the Nkok Special Economic Zone in Gabon.

CAFI is a partnership that brings together countries in the subregion (DRC, CAR, Cameroon, Republic of the Congo, Gabon and Equatorial Guinea), a coalition of donors (Germany, France, Norway, United Kingdom, EU) and Brazil with the aim of preserving the subregion's forests, mitigating climate change and contributing to sustainable development. Among other things, it supports the measures taken by countries in the subregion to promote:

- Sustainable farming practices with less conversion of forest land,
- Sustainable forest management,
- Land-use planning aimed at preserving forests,

¹⁴ <http://www.euflegt.efi.int/fr/web/apv-a-z/qu-est-ce-un-apv>

¹⁵ See Convergence Plan for the Conservation and Sustainable Management of Forest Ecosystems in Central Africa 2015–2025; measures taken by Cameroon (1990) and Gabon (2010s), for example.

Table 8.1 Discourses on zero deforestation at the global level and in Central Africa

Discourses globally	Discourses in Central Africa	Main focus	Solutions to commodity-driven deforestation	Espoused by
<i>Neoliberal</i>	<i>Zero-deforestation as a market requirement</i>	Confidence in the role of markets to find solutions to environmental problems.	Market mechanisms PES schemes, REDD+, emissions trading, carbon caps, voluntary sustainability mechanisms, individual business and sustainable investments.	“Moderate” NGOs, the private sector, and liberal governments
	<i>Productivity for protection</i>	Land sparing via productivity increases. protecting (forested) protected areas.		
<i>Legality and responsibility</i>		Support for the rule of law and proper and careful management of sourcing and procurement practices to reduce the impact of commodity production.	Effective interactions between legal frameworks, corporate responsibility for implementing due diligence principles, active civil society organizations.	Governments, EU, NGOs focusing on corporate transparency and financial organizations
<i>Limits to growth</i>		Calls for global governance, argues against privileging traditional market players and embraces efforts for global burden sharing, and fair and equitable shares in global consumption.	Stronger governments and regulatory approaches to set boundaries to expanding economy, worldwide transformative, systematic change in consumption and production patterns.	“Conscience keeping” NGOs, local agroecological and peasant movements, indigenous associations, some scientists, climate activists, youth activists, and the slow food movement.
<i>Local livelihoods</i>		Recognizes the need for land use practices in forested areas and government support for the development of decent/ acceptable livelihoods of local farmers and communities.	Land tenure as legal condition for deforestation free commodities. PES schemes, REDD+, legal protection of farmers, agricultural extension services	Farmers and communities, development organizations and some voluntary standards schemes.
	<i>Commodities for the future</i>	Belief that some commodities can be grown sustainability, supporting needs of future generations	REDD, Climate activism, agroforestry & mixed cropping	
<i>New colonialism</i>	<i>Learning from mistakes</i>	Commodity production considered as a development engine threatened by Western sanctions under the guise of nature conservation and environmental awareness. This discourse rejects negative impacts of commodity production as an unfair limiting factor to development.	Consumer behavioral change through information and awareness, regulations, and economic compensation	Governments in Cameroon and Gabon, Brazil, Indonesia, India and among palm oil and meat producers.
		Learn from mistakes made in large commodity supplying countries with now small forest areas, e.g., Ghana, Cote d’Ivoire, Indonesia, Brazil	VSS, agroforestry & mixed cropping	Traders, governments in high forest land cover areas eg Cameroon, DRC and MSP eg IDH, some environmental NGOS eg WWF, CI, researchers

Sources: Ingram et al. 2020a, Masselot 2020

- More secure land tenure, which discourages forest conversion,
- Better governance frameworks, resulting in permit and tax regimes that do not incentivize economic actors to convert forests or carry out illegal activities.¹⁶

The TFA, meanwhile, is a multi-stakeholder partnership platform set up in 2012 to support key actors in the production of commodities like palm oil, soybean, beef, cocoa and paper to transition to deforestation-free supply chains. DRC, CAR, Cameroon, Republic of the Congo and Gabon have been members of the TFA since 2015, in particular through its flagship initiative, the African Palm Oil Initiative (APOI). The APOI aims to promote the sustainable development of the oil palm sector in accordance with countries' ambitions for emergence, while respecting good environmental and social practices. With technical and financial support from TFA-APOI, these countries have drawn up national principles and action plans for the sustainable production of palm oil, which are now being implemented. Going further, three countries (CAR, Republic of the Congo and DRC) have signed the Marrakesh Declaration (2016), which sets out regional guiding principles for the responsible development of the palm oil sector.

Beyond the initiatives described above, which involve almost all countries in the subregion, there are other country-specific initiatives, such as, Gabon's certification standards initiative and Cameroon's Roadmap to Deforestation-Free Cocoa.

In September 2018, Gabon made FSC certification mandatory for all its forestry concessions from 2022. This shift from a private and voluntary governance instrument to a binding national instrument aims to combat unsustainable logging practices, including deforestation. The approval of the RSPO standard as a national standard for palm oil production by the Gabonese Standardization Agency (AGANOR) in 2019 is also part of the Gabonese Government's commitment to combating unsustainable commodity production practices, including deforestation. Moreover, as part of recent efforts to revise Gabon's national interpretation of the RSPO (December 2019–July 2020), the government has shown political will despite the RSPO being, in essence, a civil society and private sector-led mechanism. Through these initiatives, the Gabonese authorities hope, among other things, to ensure that Gabonese goods have access to markets aware of the need to combat imported deforestation or to avoid Gabonese goods being boycotted by consumers and NGOs. This motive also drives the Cameroonian authorities adoption of the Roadmap to Deforestation-Free Cocoa in Cameroon. This roadmap provides a shared framework for action and was developed by stakeholders in the cocoa value chain from 2019 through a participatory process supported by IDH, The Sustainable Trade Initiative. The objective of this action plan is to promote the production of deforestation-free cocoa that meets the government's production ambitions and sustainability standards, compliance with which is increasingly required to access certain international markets. Through the Standards and Quality Agency (ANOR), the Cameroonian Government is also working to standardize agricultural and forestry commodities. Such standards include APNC 2895-96-97 on sustainable and traceable cocoa and ARSO/AES 2014 on timber, which are currently being revised or adopted and could help the country to adjust to the requirements of deforestation-free value chains.

In addition to the actions taken above, governments in the subregion are engaged in projects or processes not explicitly aimed at mitigating the impacts of initiatives to combat imported deforestation, but that are likely to help them comply with the requirements of deforestation-free agricultural value chains or manage the effects of initiatives seeking to prevent the destruction of forest cover for agricultural purposes. Such initiatives include REDD+ processes (DRC, Republic of

¹⁶ <https://www.cafi.org/content/cafi/en/home/>

the Congo, Cameroon, CAR), diversifying agricultural production (Republic of the Congo, Cameroon, Gabon), promoting climate-smart agriculture (Republic of the Congo), land-use planning (Gabon, Cameroon, Republic of the Congo, DRC) and the decision to focus large-scale agricultural projects on savannah areas (Republic of the Congo).

8.3.3 NGO actions

Imported deforestation is of interest to several international and national environmental NGOs working in the region. Such international environmental NGOs include WWF, World Resources Institute (WRI), Greenpeace, Forest People's Programme, Proforest, Earth Worm Foundation, FERN, Wildlife Conservation Society (WCS) and the Rainforest Alliance. National NGOs include the Center for Environment and Development (CED), Brainforest, Education Environnement Développement Durable (Education, Environment, Sustainable Development – EEDD), Comité Des Droits De L'Homme et Développement (Human Rights and Development Committee – CODHOD), Femme, Environnement, Santé et Education (Women, Environment, Health and Education – FENSED), Service d'Appui aux Initiatives Locales de Développement (Support Services for Local Development Initiatives – SAILD), Forêts et Développement Rural (Forests and Rural Development – FODER), International Development Research Centre (IDRC) Africa, Muyissi Environnement, ASD and Observatoire congolais des droits de l'homme (Congolese Human Rights Observer – OCDH). Between 2017 and 2020, several international environmental NGOs, often in collaboration with national environmental NGOs, organized or facilitated workshops in a number of countries in the subregion to raise awareness or build capacity among stakeholders involved in producing or trading commodities. They covered different aspects of imported deforestation and the requirements imposed by initiatives to prevent it. Beyond building the technical capacity of these stakeholders, some of these NGOs sought to support stakeholders – including small producers – to build their organizational capacity. These awareness raising and capacity building efforts aimed to help stakeholders avoid or mitigate the negative consequences of measures to combat imported deforestation by enabling them to comply with the requirements of organizations, governments, investors and consumers in buyer countries. They also aim to help these stakeholders to harness the opportunities offered by organizations, governments, investors and consumers in buyer countries as part of efforts to combat imported deforestation.

Key imported deforestation initiatives implemented or supported by environmental NGOs include:

- TFA-APOI facilitated by Proforest, WWF, WRI, CODHOD, EEDD and Brainforest in the subregion.
- The Roadmap to Deforestation-Free Cocoa in Cameroon, facilitated by IDH and supported by around a dozen environmental NGOs.
- The Green Commodity Landscape Programme (GCLP) launched in Cameroon in 2018 by IDH and WWF. The GCLP is a multi-stakeholder programme operating at the landscape level. It aims to support sustainable commodity production while contributing to the protection of forests and improving the livelihoods of farmers and their communities. It uses cocoa production as an entry point into the landscape. The GCLP seeks, among other things, to help growers and the Cameroonian Government to produce commodities in a way that maintains access to major European markets through compliance with the commitments made by private companies (Cargill, Olam, Barry Callebaut, Mars, etc.) and other requirements of consumer countries.
- The Accountability Framework Initiative (AFI) is a collaborative effort to create and scale up ethical supply chains for agricultural and forestry products. Led by a diverse global coalition of environmental and human rights organizations under the leadership of the Rainforest Alliance, the AFI strives to build a 'new normal' where commodity production and trade truly protect

natural ecosystems and human rights.¹⁷ It has been active in the subregion (DRC, Cameroon, Gabon, CAR, Republic of the Congo) since 2019 under the leadership of WWF and the Rainforest Alliance, which handle promotion.

Finally, with regard to voluntary certification initiatives, environmental NGOs tend to focus on three key lines of action:

- Supporting the development of standards. Between 2005 and 2018, WWF supported the regional and national FSC interpretation initiatives; WWF, Proforest, Brainforest, FENSED and other environmental NGOs launched and/or supported Gabon's national RSPO interpretation efforts (RSPO Principles & Criteria 2013 and 2018); WWF, Proforest, the Zoological Society of London (ZSL) and Forest Peoples Programme helped launch and/or support Cameroon's national RSPO interpretation process, which is currently under way.
- Awareness raising among the private sector and producer groups to encourage companies to engage in the FSC (wood), RSPO (palm oil) or Rainforest Alliance (cocoa) certification process. WWF, Proforest and Rainforest Alliance have been highly active in this field for years.
- Technical and financial support for the private sector to undertake the certification process. For example, for several years, WWF has supported a number of forestry companies engaged in the FSC certification process (such as Palisco and Wijma in Cameroon, and CBG in Gabon).

These interventions aim, on the one hand, to help stakeholders to defend against the negative consequences of measures to combat imported deforestation by enabling them to comply with the new requirements and, on the other, to help them to harness the opportunities offered by organizations, governments, investors and consumers in buyer countries as part of efforts to combat imported deforestation.

8.3.4 Private sector initiatives

Policies on imported deforestation adopted by countries in the global North impact commodity-producing countries, and private sector companies that produce and sell raw materials in particular. The private sector in Central Africa has responded to these policies in two main ways. Companies either take steps to comply with the requirements of the deforestation-free production and sale of commodities through sustainable production commitments or they circumvent them and reorient themselves towards alternative markets. These commitments to sustainable production mainly take the form of corporate sustainability policies, on the one hand, and the certification of their forestry and agricultural operations, on the other.

Commitments to greater sustainability in forestry and industrial agriculture operations in Central Africa remain modest, as illustrated below. In response to the introduction of increasingly strict anti-deforestation policies by countries in the global North, some companies (especially forestry companies operating in Central Africa) are diversifying their markets and shifting to more permissive markets in Asia, in particular China, India and Vietnam. This trend has been fuelled by, among other things, the intensification of multisectoral cooperation between Congo Basin countries and China over recent years and the massive influx of Chinese capital into the Central African forestry sector. A case in point: between 2005 and 2019, the number of Chinese-owned forestry companies in Cameroon increased from 4 to 12 and the forest management unit area controlled by them increased

¹⁷ <https://accountability-framework.org/about/about-the-initiative/>

from around 50,000 ha to 110,000 ha (Zongang 2019). This shift means that countries in the global North can ease their conscience by not importing products that contribute to deforestation, while not actually doing anything to prevent it in producer countries.

8.4 Initiatives taken by importing countries to tackle imported deforestation

In response to increasingly vocal pressure from NGOs, civil society and consumer groups, a number of public policies and market-based, private sector initiatives (including voluntary sustainability standards for agricultural commodities and timber) have emerged at the international level, especially in Europe, North America and China.

European countries are currently considering several possible ways to implement a policy to combat imported deforestation. They range from government regulations enforced by national or supranational public bodies to private governance mechanisms under which companies voluntarily work to produce commodities without causing deforestation or severe forest degradation.

Over the past 20 years, private sector actors have increasingly defined and monitored their own performance when it comes to sustainability, either via certification standards or by developing their own procedures and criteria. These voluntary approaches have often been criticized for only covering a minority of companies and failing to reach other producers who supply markets that are less sensitive to the sustainable production of agricultural commodities. These voluntary private approaches are also criticized because a large number of companies fail to fulfil their commitments, particularly when they commit to deforestation-free production practices. Year after year, multinationals make little to no progress towards the goals set by the New York Declaration or the Bonn Challenge.

Companies' lacklustre performance on combating imported deforestation should not, however, overshadow the significant progress made by certification standards over the past 15 years as regards their operational content on sustainability. The place of standards is relatively settled in some sectors, such as FSC and PEFC certification for wood and Rainforest Alliance certification for coffee and cocoa. This has not however been the case for other tropical agricultural products. Though now accepted, standards and certification procedures applicable to such products were largely absent over the past decade and often controversial. The overarching goal of private standards is sustainability. But so far they have failed to incorporate substantial provisions to prevent deforestation or limit forest degradation. Moreover, some standards underperform on a number of social criteria, the implementation of which is often criticized.

As importing countries consider how to implement policies to combat deforestation, it is useful to examine how far existing sustainability standards could help them move towards this goal. To this end, Table 8.1 presents four sectors that have a worrying impact on Central African forests (palm oil, cocoa, rubber and wood) and, by way of example, the requirements set out in the French Strategy to Combat Imported Deforestation (SNDI). These requirements are grouped into three categories: (i) environmental impacts, such as forest and peatland degradation, the use of the High Conservation Value (HCV) and High Carbon Stock (HCS) approaches; (ii) social impacts, such as labour law, free, prior and informed consent, respect for the legal and customary status of land; and (iii) how the standard is applied, including access to certification for small producers.

8.4.1 European Union public policy

Deforestation and forest degradation contribute to some of the major global sustainability challenges such as biodiversity protection, climate change, human rights, peace and security, good governance and the rule of law. The European Union (EU) has made tackling these global challenges one of its priorities, to ensure that EU meets its international commitments and contributes significantly to solving and mitigating the problems.

The Amsterdam Declaration of December 2015 – with separate declarations on **deforestation and palm oil** – was made on the sidelines of the COP21 Paris Agreement on Climate Change. Since 2021, the Amsterdam Declaration Partnership includes Belgium, Denmark, France, Germany, Netherlands, Norway, Spain, Italy and the United Kingdom and advocates political commitments and public policies **to achieve sustainable and deforestation-free agricultural commodity supply chains in Europe and facilitate national level multi-stakeholder initiatives**, working in partnership with private sector companies and producer countries. Eliminating deforestation associated with agricultural product value chains was made a point of political dialogues and trade negotiations with producer countries (Karsenty, 2019). **These efforts have driven policy changes and commitments among partner countries and at EU-level.** The French Strategy for the Fight against Imported Deforestation (Stratégie nationale de lutte contre la déforestation importée, SNDI), uses the term imported deforestation. The national territory in this case is France or any other European country, and outside implies countries in Central Africa or other tropical country since it is considered that deforestation occurs mainly in tropical regions.

On a European level, following an analysis of the impact of EU consumption on deforestation (European Union 2013), and complementing to the EU Timber Regulation (EUTR) (Regulation (EU) No 995/2010) and the Forest Law Enforcement, Governance and Trade (FLEGT) Regulation (Council Regulation (EC) No 2173/2005), in 2018 a feasibility study¹⁸ on EU options to step up action against deforestation was published. In July 2019, the European Commission adopted the EU Communication on Stepping up EU Action to Protect and Restore the World's Forests.¹⁹ Five priority areas for action were set out: EU demand side measures, partnerships with producer countries worldwide, international multilateral cooperation and redirecting finance and advancing information. The proposals for action were developed as an integral part of the overall EU initiative of a European Green Deal (2019)²⁰ linking this set of actions on forests to other relevant initiatives, such as the European Biodiversity Strategy²¹ and the Farm to Fork Strategy²². In 2019 the European Commission considered how to step up EU Action to protect and restore the world's forests and set up an open public consultation on “Deforestation and forest degradation – reducing the impact of products placed on the EU market” (European Commission 2019). In October 2020, the European Parliament adopted a resolution with recommendations to the Commission on an EU legal framework to halt and reverse EU-driven global deforestation (European Parliament 2020). This legislative initiative looks at the feasibility and effectiveness of creating mandatory rules based on due diligence, similar to the EU Timber Regulation and Forest Law Enforcement, Governance

18 European Union (2018) *Feasibility study on options to step up EU action against deforestation*. Luxembourg: Publications Office of the European Union. DOI: 10.2779/75460. Available at: <https://op.europa.eu/en/publication-detail/-/publication/84b3bef5-2d86-11e8-b5fe-01aa75ed71a1/language-en>

19 European Commission, Directorate-General for Environment (2019) *Stepping up EU Action to Protect and Restore the World's Forests*. Available at <https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX:52019DC0352>

20 https://ec.europa.eu/info/strategy/priorities-2019-2024/european-green-deal_en

21 https://environment.ec.europa.eu/strategy/biodiversity-strategy-2030_en

22 https://ec.europa.eu/info/strategy/priorities-2019-2024/european-green-deal/actions-being-taken-eu/farm-fork_en

and Trade (FLEGT) Voluntary Partnership Agreements (VPAs) system, for forest risk commodities in addition to timber, as well as promoting voluntary third-party certification and labels.

Since the launch of the communication in 2019, the focus and discussions have been centered around the preparation for additional measures related to the EU demand side, particularly regarding measures to minimize the risk of deforestation and forest degradation associated with products placed on the EU market, including mandatory labelling, certifications schemes, legality standards, country benchmarking, carding systems, et cetera. Based on experiences with the EU Timber Regulation, a more comprehensive understanding has been gained of how the due diligence approach can be applied on a wider range of commodities, such as cocoa, coffee, palm oil, soy, beef and timber. A legislative proposal to minimize the risk that products linked to deforestation be sold in the European market was published in 2021.

As the European Commission carried out a fitness check of EUTR and FLEGT Regulations in 2021, the experiences from Central African countries are of critical importance to help evaluate the functioning of both regulations to combat illegal logging and to provide insights into how a similar system can be applied for commodities other than timber. The demand side public policy making in Europe should be ensured to contribute to impacts on the ground and reflect, service the needs of producer countries.

8.4.2 Public policy in the United States

The United States is a major consumer of forest-risk commodities, such as beef, soybeans, palm oil and wood products, although compared to Europe and China, the total imported volume of these commodities from tropics is less significant.²³

Since 2008, the U.S. Lacey Act, which previously applied only to wildlife trade, was amended to include the banning of imports and the trade in illegal timber and wood products from foreign countries. The imported volume of wood product has declined and prices for tropical hard wood has increased, as the country shifts to domestic wood sourcing. In the meantime, since the Lacey amendments took effect,²⁴ China has become a major exporter of timber to the United States. However, the amount of tropical wood in these imports which originated from China has dropped. Research has shown that the impacts of Lacey Act mainly result from avoiding high-risk area and high-risk products.²⁵ Hence the exact effects on the ground in tropical timber producer regions is unclear. More global measures and research have to be carried out to better understand its global impacts on solving illegal logging and protecting world's forests.

Another relevant action was the enactment of the Tropical Forest Conservation Reauthorization Act (TFCA) of 2019,²⁶ which is a debt-for-nature swap initiative (established in 1998) that mobilizes funding for tropical forest conservation. A USD 15 million fund was made available in 2020 and USD 20 million is expected to be provided in 2021. Several TFCA agreements have been signed

23 See import volumes in Beckman, Jayson, Ronald D. Sands, Anne A. Riddle, Tani Lee and Jacob M. Walloga. International Trade and Deforestation: Potential Policy Effects via a Global Economic Model, ERR-229, U.S. Department of Agriculture, Economic Research Service, April 2017. Available at: <https://www.ers.usda.gov/webdocs/publications/83299/err-229.pdf?v=1569.1>

24 UCS (2015) The Lacey Act's Effectiveness in Reducing Illegal Wood Imports. Available at: <https://www.ucsusa.org/sites/default/files/attach/2015/10/ucs-lacey-report-2015.pdf>

25 *ibid.*

26 <https://www.usaid.gov/tropical-forest-conservation-act>

with several governments since 1998. According to the Congressional Research Service,²⁷ USD 233.4 million has been used in 14 countries for 20 forest projects, and more than USD 339 million has been leveraged through congressional funds and donations for tropical forest conservation. Approximately 67 million acres (around 27 million hectare) of tropical forest were conserved in countries such as Indonesia, Brazil, Paraguay, Botswana and Peru.²⁸ Nonetheless, so far little systemic academic research on the effectiveness and impacts of TFCA has been conducted.

8.4.3 Public policy in China

The sustainability agenda in China has been slow moving in the last decades. However, although still in nascent stage, in the past few years, enabling factors in both public and private sectors emerged which create a promising environment to speed up and scale up current efforts to address deforestation linked to commodity imports. China is the largest importer for tropical timber, soy and beef, and second or third largest importer of palm oil.²⁹ Hence the sustainability of commodity trade and related forest protection agendas cannot be discussed without looking at the huge Chinese market.

In 2017, China included ‘ecological civilization’ into its constitution as the framework for its pathway to sustainable development.³⁰ The government committed to be a responsible power on tackling climate change and biodiversity loss. Some green supply chain policies and guidelines³¹ have been enacted. The ongoing formulation of the China green value chain strategy combined with the South-South cooperation and partnership through Green Belt and Road Initiatives could have positive implications for Central African Countries. China’s intention to ensure legal timber imports and future deforestation-free palm oil imports could create synergies and align with global efforts.

In June 2020, the draft of an updated “Green Bonds Endorsed Projects Catalogue” was published by the People’s Bank of China, the National Development and Reform Commission, and the China Securities Regulatory Commission for public consultation. This draft includes the recognition of sustainable agricultural commodities certified by international certification schemes, such as Roundtable on Sustainable Palm Oil (RSPO), Round Table on Responsible Soy (RTRS), Forest Stewardship Council (FSC). This marks a significant step for the official regulation to include international standards. It sends a strong signal to the private sector and reflects that the Chinese market actors are changing to align more with international environment as many Chinese companies and investment sector start to expand their operations overseas.

A policy study report to greening China’s soft commodity value chains was published by the China Council for International Cooperation on Environment and Development (CCICED, 2020).³² In addition to a national green value chain strategy, the Council suggested that the government to adopt mandatory and voluntary measures to reduce the import of commodities that are illegally harvested and to strengthen due diligence and traceability systems. This could be built upon the

27 <https://fas.org/sgp/crs/misc/RL31286.pdf>

28 <https://www.nature.org/en-us/about-us/who-we-are/how-we-work/policy/tropical-forest-conservation-act/>

29 CCICED (2020) *Global Green Value Chains – Greening China’s ‘Soft Commodity’ Value Chains*. Available at: <https://cciced.eco/wp-content/uploads/2020/09/SPS-4-2-Global-Green-Value-Chains-1.pdf>

30 Hansen, M. H., Li, H. Svarverud R. (2018) Ecological civilization: Interpreting the Chinese past, projecting the global future, *Global Environmental Change*, volume 53, pp. 195–203. <https://doi.org/10.1016/j.gloenvcha.2018.09.014>.

31 Such as the Guiding Opinions on Promoting a Green Belt and Road Initiative (2017), Belt and Road Initiative Green Supply Chain Cooperation Platform (2018), Notice on Supply Chain Innovation and Application Pilot (2018), and other relevant documents and guidelines released in 2019.

32 *ibid*

latest revision of the China Forest Law,³³ that prohibit the use of illegal timber. Similar regulations could expand gradually to cover other soft commodities.

8.4.4 Private sector commitments

International companies made commitments to move towards Zero Net Deforestation (ZND) through the Consumer Goods Forum (CGF) in 2010. The objective was to eliminate net deforestation from their value chains by 2020. These commitments were reinforced in 2014 by the New York Declaration on Forests (NYDF), through which 190 organizations including 57 multinationals committed to eliminate deforestation from their production and supply chains by 2020.

In the cocoa sector, NGO pressure has stimulated companies to avoid risk, take collective action and mitigate negative publicity. NGOs pressured major traders buying from the region such as Cargill, Olam and Barry Callebaut and the chocolate manufacturers they supply to, to adopt corporate pledges and sustainability programs, and to engage in public-private partnerships, such as landscape approach embodied in a Framework for Action for the Roadmap to Deforestation-free Cocoa in Cameroon³⁴ led by the Dutch Initiative for Sustainable Trade (IDH) in 2019. In 2021 companies operating in Cameroon joined the World Cocoa Foundation's (an alliance of major cocoa and chocolate companies worldwide) Cocoa & Forests Initiative between private and public sector in 2021.

The private sector, as part of corporate social responsibility or sustainability commitments, has made public commitments to sustainable development and, specifically concerning biodiversity, human rights, deforestation and climate change. Many multinational industrial agribusinesses operating in Central Africa have committed to eliminate deforestation from their supply chains, either through certification or through their internal sustainability policies. For example, the Cargill Group, alongside its Cameroonian partner Telcar Cocoa Ltd, has committed to, among other things, reduce greenhouse gas emissions from its supply chains by 30 percent by 2030.³⁵ Similarly, the Olam Group, which has a major presence in Gabon's palm oil sector and Cameroon's cocoa sector, has set itself the objective to develop responsible and sustainable agricultural supply chains, in which prosperous farmers and producers, flourishing rural communities and healthy ecosystems can coexist.³⁶ Halcyon, the parent company of SudCam and Hevecam, has committed in its sustainability policy to avoid deforestation in all its operations by applying the High Conservation Value (HCV) and the High Carbon Stock (HCS) approaches.³⁷ Many multinationals operating in the Congo Basin have committed to combat deforestation, mainly in response to the anti-deforestation regulations and campaigns implemented by governments, international environmental NGOs and consumers in those countries importing the commodities. In a similar vein, private sector companies are also engaging in multi-stakeholder platforms aimed at protecting natural ecosystems and promoting sustainability in the production and marketing of agricultural commodities, among other things. This is the case for several companies that have joined the TFA (e.g. Olam, Socfin, Feronia, Cargill, Nestlé).³⁸ In committing to this initiative, companies undertake, among other things, to reduce

33 <https://www.atibt.org/wp-content/uploads/2020/01/China-Forest-Law-Amendment-2020-20191228.pdf>

34 <https://www.tropicalforestalliance.org/en/news-and-events/news/press-release-Camerounian-cocoa-stakeholders-sign-a-roadmap-towards-sustainable-and-deforestation-free-cocoa>

35 <https://www.cargill.com/sustainability/priorities/climate-change>

36 <https://www.olamgroup.com/sustainability.html>

37 <https://www.halcyonagri.com/publication/sustainable-natural-rubber-supply-chain-policy-snrscp/> (1 November 2020)

38 <https://www.tropicalforestalliance.org/> (21 October 2020)

deforestation in their supply chains. However, it is still too early to assess how effective this commitment has been when it comes to reducing deforestation in practice.

8.4.5 Voluntary sustainability certification standards for commodities

Voluntary sustainability standards are used to demonstrate commitments and sustainable production processes to suppliers and consumers. The Central Africa region has lower coverage of sustainability certification both in terms of volume and hectares certified than other major commodity-producing regions.

There are a number of certification schemes for **wood** that could impact forest conservation. They have emerged on the market in response to increasing pressure from consumers concerned about the environmental credentials of products entering their markets. This is the case for the FSC, PEFC and other certificates of legality (OLB, LegalSource, etc.) for wood and RSPO for palm oil. At present, 3,653,948 ha of forest are FSC certified in the Congo Basin (in Cameroon, RoC and Gabon), while 596,822 ha³⁹ are PEFC certified and 9,543,857 ha⁴⁰ have a certificate of legality. The FSC and PEFC certification systems are also championed by Fair&Precious, a collective and collaborative brand created by the International Tropical Timber Technical Association (ATIBT) and its members, whose objectives include the sustainable management and protection of tropical forests.⁴¹ As regards the certification of other agricultural products, currently only Olam Palm Gabon has an RSPO-certified palm oil plantation (112,455 ha) and the company plans to certify all its operations in Gabon by 2021.⁴² In Cameroon, the Socapalm (around 70,000 ha) and Safacam (around 9,000 ha) plantations are in the process of obtaining RSPO certification. In DRC, Feronia (Plantations et Huileries du Congo S.A., with 107,301 ha)⁴³ has stated that it is also undertaking RSPO certification.⁴⁴ Current debates centre on the sustainability and legality of tropical timber and the slow growth in demand for certified tropical hardwood (Tropenbos International 2014).

For **rubber**, only Hevecam (21,140 ha planted), a subsidiary of the multinational Halcyon, is undertaking the FSC certification process. There are no other similar initiatives for rubber in the Congo Basin, but it should be noted that Olam Rubber Gabon (11,000 hectares planted) is working to combat deforestation at its plantation in northern Gabon, in particular by protecting nearly 25,000 ha of HCV land.⁴⁵

For **cocoa** in the Congo Basin, 11 producer groups have been certified by UTZ/Rainforest Alliance,⁴⁶ with the support of several buyers/exporters (Olam, Telcar/Cargill, Sic Cacaos/Barry Callebaut, Agroproduce Management Services LTD (AMS)/Theobroma, Ferrero). Certification gives these growers access to a niche market offering premium prices to stakeholders in these value chains. Certification should also enable them to maintain their access to consumer markets where anti-

39 <http://pafc-certification.org/gabon/pafc-gabon-intro>

40 Programme for the Promotion of Certified Forests (PPECF), Personal communication (Cameroon 3,609,931 ha; Republic of the Congo 3,211,003 ha; Gabon 2,033,627 ha; DRC 689,296 ha)

41 <https://www.fair-and-precious.org/en/p/10/managing-and-protecting-forests-to-combat-global-warming> (1 November 2020)

42 <https://www.olamgroup.com/sustainability/sustainable-supply-chains/sustainable-palm-oil.html>

43 <https://www.feronia.com/plantations> (1 November 2020)

44 <https://www.feronia.com/sustainability/view/sustainability-strategy> (1 November 2020)

45 <https://www.olamgroup.com/locations/west-and-central-africa/gabon.html> (1 November 2020)

46 <https://utz.org/>

deforestation requirements apply. No Rainforest Alliance certified **coffee** is produced, but organic and Fairtrade certified coffee is grown in the Kivu region of DRC.

8.4.6 Voluntary sustainability certification standards: Compatibility with efforts to combat imported deforestation

Existing private certification systems have enabled several sectors to make significant progress towards deforestation-free production. This is the case for timber, for which the PEFC and FSC standards meet most of the demands of France's National Strategy to Combat Imported Deforestation (SNDI), although the application of certain criteria could be improved. The RSPO certification for palm oil is also largely compatible with the SNDI criteria, but there are still issues around product traceability and the treatment of forest degradation. These two shortcomings are also found in the Rainforest Alliance standard for cocoa, but most of the SNDI criteria are covered.

Despite the mixed performance of these standards across these sectors, they share several weaknesses when it comes to compliance with public policies aimed at preventing imported deforestation:

- These sustainability standards are still ill equipped to estimate deforestation, forest degradation or impacts on peatlands;
- The HCS approach is still not used to full effect, unlike the more common approach of identifying HCV areas, although monitoring of HCV areas is still inadequate;
- Most of the social criteria included in the SNDI are also included in most of the standards, but they are poorly monitored in practice, according to NGOs, among other stakeholders;
- Product traceability is almost always a challenge, because it is rarely possible to trace products back to where they were grown;
- The independence and transparency of certification audits are often questioned;
- Small-scale producers in the global South still struggle to access certification.

Private sustainability standards, in their current form, are not therefore able to take a leading role in efforts to stop imported deforestation. Two aspects must be addressed to better equip them to support the implementation of the SNDI policy. On the one hand, in the short term, the content and implementation arrangements must be revised, and many standards are currently in the process of doing this. On the other, their linkages with other approaches that could complement the implementation of this policy should be considered. These approaches could include the negotiation of bilateral or multilateral agreements between producer and consumer countries, the management of geographic risk in production areas, or the territory-level certification of areas that are firmly committed to sustainable development.

8.4.7 NGO actions

Globally, international, national and local NGOs such as Global Witness, Forests 500, Supply Change by Forests Trends, Tropical Forest Alliance 2020 (TFA 2020), CDP Disclosure Insight Action, the Accountability Framework, WWF's Collaboration for Forests and Agriculture (CFA) and SPOTT have developed traceability mechanisms to spotlight and assess negative environmental and social impacts, show legality and forest-risk along value chains and demonstrate the (lack of) exercise of due diligence in commodity value chains. Third-party campaigns and investigations have sought to reveal the (lack of) due diligence at corporate, chain and sector scale (Ingram et al. 2018)

disclosing practices based on field research which are published in reports, via the media and on interactive websites.

Specifically focusing on the Congo Basin moist forests, NGO investigations into timber related deforestation have been the most common, often with a focus on illegal logging, such as Global Forest Watch and Obster. In the cocoa sector, the Cocoa Barometers (Fountain and Hütz-Adams 2018) campaign by Mighty Earth (Higonnet et al. 2018) have created negative publicity about the deforestation due to cocoa production in West and Central Africa generally. Campaigns, reports and websites directed at consumers and companies on illegal expansion and deforestation due to palm oil plantations in Cameroon by Greenpeace,⁴⁷ CED,⁴⁸ Réseau de Lutte contre la Faim (Fight Against Hunger Network – RELUFA)⁴⁹ and ICENECDEV⁵⁰, and on the rubber sector in Cameroon and Republic of the Congo (Seale 2019, Orozco and Salber 2019) have led to disinvestment, free, prior and informed consent processes and changes to corporate policy.

Conclusions

There appears to be consensus around the need to combat deforestation among different direct and indirect stakeholders involved in land management in Central Africa. Nevertheless, the policies and approaches adopted and implemented to this end can have serious social and economic consequences for producer and exporting countries in this region.

Importing countries in Europe and America adopt binding consumer-side policies under the influence of activist civil society organizations. By the end of 2021, the EU is expected to adopt binding legislation prohibiting the importation of products suspected of contributing to deforestation, the underlying assumption being that deforestation is only a tropical phenomenon, linked to the production of commodities traded on international markets. The products most affected in Central Africa are palm oil, cocoa, rubber, wood and, to a lesser extent, coffee. The technical arrangements for implementing these policies and measures to combat imported deforestation in importing countries are still unclear or not yet defined. Barriers to the development of credible implementation strategies include the lack of consensus on how to define forests and, therefore, deforestation. Nevertheless, the certification approach has been applied to timber products for around 20 years and is increasingly applied to palm oil and cocoa. It offers a technical solution, both in respect of the production units and the territorial entities that have made commitments.

Central African producers and exporters are increasingly aware of and compliant with the new requirements of zero-deforestation policies and measures to combat imported deforestation adopted by developed importing countries. This is all the more relevant, given that Central African countries understand the threat that such policies pose to their national economies. Central African stakeholders have responded in two ways:

1) by diversifying their markets to export more to less demanding markets, and 2) by adopting sustainable management practices for the production of the commodities concerned, by increasing efforts to eliminate deforestation from production chains. Central African approaches are led not just by governments, but also by private sector and civil society actors.

47 <https://www.greenpeace.org/usa/wp-content/uploads/legacy/Global/usa/planet3/PDFs/HeraklesCrimeFile.pdf>

48 <http://www.cedcameroun.org/projets/reducing-footprint-of-palm-oil-on-forests/>

49 <https://news.mongabay.com/2020/06/if-they-take-our-lands-well-be-dead-Cameroun-village-battles-palm-oil-giant/>

50 <https://www.icenecdev.org/Land-Grabbing-in-Cameroun.pdf>

To limit the negative economic impacts of the adoption and implementation of policies on imported deforestation, particularly in Europe, Central African governments should prioritize negotiation activities, possibly as part of discussions between ECCAS and the EU. Such negotiations should encourage the adoption of more realistic implementation schedules and relevant support measures both for governments and other stakeholders in these commodity chains. The experience of FLEGT in Central Africa could serve as a model (with room for improvement). Given that they share similar ecosystems, Central African countries could, as a starting point, seek to harmonize their technical approaches, for example, by agreeing a definition of forest and how to monitor deforestation.

