



environmental  
investigation  
agency

# POACHED TIMBER

Forest Crimes, Corruption, and  
Ivory Trafficking in the Malian  
Rosewood Trade with China

May 2022





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## ACKNOWLEDGEMENT

The document has been produced with financial assistance from the Tilia Fund, Good Energies Foundation, and the Cox Family Fund. The contents of this publication are the sole responsibility of EIA-US and do not necessarily reflect the positions of any donors.

## ABOUT EIA

We investigate and campaign against environmental crime and abuse. Our undercover investigations expose transnational wildlife crime, with a focus on elephants and tigers, and forest crimes such as illegal logging and deforestation for cash crops like palm oil. We work to safeguard global marine ecosystems by addressing the threats posed by plastic pollution, bycatch and commercial exploitation of whales, dolphins and porpoises. Finally, we reduce the impact of climate change by campaigning to eliminate powerful refrigerant greenhouse gases, exposing related illicit trade and improving energy efficiency in the cooling sector

### EIA US

PO Box 53343  
Washington DC 20009  
USA

T: +1 202 483-6621


E: [info@eia-global.org](mailto:info@eia-global.org)

[eia-global.org](http://eia-global.org)

Design: [www.designsolutions.me.uk](http://www.designsolutions.me.uk)

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Malian activists who have raised their voices against rosewood traffic have received death threats and have been forced to hide themselves and their families.

## EXECUTIVE SUMMARY

Since 2018, Mali has suffered two military coups, while the country has become one of the largest suppliers of rosewood to China, through the export of *Pterocarpus erinaceus* - commonly identified as “kosso,” “keno,” or “bois de vène,” a species the trade of which is regulated by the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), since January 2017.

The Environmental Investigation Agency (EIA)’s findings indicate that China has imported the equivalent of half a million kosso trees from Mali - worth approximately US\$220 million, between January 2017 and January 2022, a large portion of it being the product of illegal harvesting or illegal export. The relentless timber poaching in the Southern forests of Mali has resulted in a significant decline of the species.

According to EIA’s new investigation, the international trade in kosso from Mali is rigged with illegalities, including illegal harvest, illegal export, and frequent CITES frauds such as invalid permitting and misdeclaration. EIA’s research indicates that the international trade in kosso in its current form has continuously been prohibited in Mali since May 2020, via an harvest ban in effect from May 2020 to March 2021 and a log export ban regulation effective since February 2021. From May 2020 to March 2022, EIA estimates that

China imported over 148,000 tons of kosso – equivalent to approximately 5,500 containers, 440,000 logs, or approximately 220,000 trees. EIA investigators learned that the rosewood traders have exported most of the Malian kosso from the port of Dakar, seemingly relying on the shipping services from AP Moller-Maersk (Maersk), Compagnie Maritime d’Affrètement-Compagnie Générale Maritime (CMA-CGM), and Mediterranean Shipping Company (MSC). The companies’ responses to EIA’s written inquiries about their alleged role in the rosewood trafficking are available on p.10 and p.14.

The trade has reportedly led to the decline in kosso populations in various southern forest regions in Mali. The Chinese trader known locally as “Frank” and his business partner, who carry out the largest rosewood trading operation in the country, have also allegedly been involved in ivory smuggling between Mali and China, starting in 2017 until at least 2020. Several tons of ivory

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## From May 2020 to March 2022, EIA estimates that China imported over 5,500 containers or approximately 220,000 trees, in breach of Malian laws.

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have been smuggled out of Africa each year, hidden in rosewood squared logs, including tusks from poached Gourma elephants (*Loxodonta africana*), Africa's northernmost population. The Gourma elephant, described as on the edge of annihilation, is one of the last remaining populations of desert-adapted elephants in the world. EIA's investigation offers an unprecedented look into the convergence of organized nature crimes in Africa, a problem still largely undocumented.

According to EIA's findings, the illegal trade in kosso from Mali and the longstanding export monopoly granted to the company Générale Industrie du Bois SARL (GIB), controlled by the Malian entrepreneur Aboubacrine Sidick Cissé, has allegedly relied on deeply entrenched corruption schemes. EIA investigators learned about a well-oiled bribery circuit in the capital Bamako, where people sent by the company have seemingly been responsible for distributing the equivalent of US\$20,000+ in cash bundles to members of the Ministry of Environment, Sanitation, and Sustainable Development, the Direction of the Forestry Administration (Water and Forests Service), and the Direction of Commerce, Consumption, and Competition. EIA did not receive a response to its multiple inquiries from Aboubacrine Sidick Cissé nor Mamadou Gackou, the former National Director of the Forestry Administration (Water and Forests Service) and currently General Secretary of the Ministry of the Environment, Sanitation, and Sustainable Development.

The rosewood traffic in the fragile Malian state is yet another example of a well-documented crisis that has devastated West Africa for a decade. However, there is hope that this crisis could come to an end soon. At the 74th meeting of the CITES Standing Committee, which took place in March 2022, Parties agreed on unprecedented measures to tackle the violation of the Convention across West Africa. According to the Secretariat's Notification to the Parties, the West African range States had until April 27, 2022 to demonstrate that the international trade complies with the Convention by providing a non-detriment finding (NDF) and legal acquisition finding (LAF) or formally stopping the trade by requesting the Secretariat to publish a voluntary zero export quota for kosso. It is worth noting that as of the

25th Meeting of the Plants Committee in June 2021, none of the range States had produced a scientifically robust NDF.

At the time of publication the deadline for countries to submit information had passed and information submitted is under review. Any range States requesting a zero export quota should be commended for their cooperative engagement. Few, if any, of the range States have both a NDF and LAF to demonstrate trade in *Pterocarpus erinaceus* is in full compliance with the Convention. It is therefore essential that a recommendation to suspend trade be established for the remaining countries not able to demonstrate the scientific and legal basis for their exports.

Given their alleged role in transporting shipments of square logs of *Pterocarpus erinaceus* in breach of Malian laws, shipping lines have a unique opportunity to combat illegal logging and related trade in Mali and across the region. Alerted by EIA on the systemic illegalities in Mali, Maersk committed to immediately block acceptance of rosewood shipments from Mali. The company also committed to fully support a potential regional suspension of the trade in *Pterocarpus erinaceus* under CITES and said it would stop accepting bookings of rosewood from all concerned countries.

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### EIA recommends that:

- Mali stops exporting *Pterocarpus erinaceus* and requests the Secretariat to issue a voluntary zero export quota, until Mali provides both a science-based non-detriment finding (NDF) and legal acquisition finding (LAF) to the CITES Secretariat and Chairs of the Standing Committee and Plants Committee.
- Senegal, Togo, and other re-exporting Parties undertake due diligence in compliance with the CITES rules before issuing any re-export permits.
- China and Vietnam stop importing *Pterocarpus erinaceus*, based on concerns related to the sustainability and legality of international trade.
- China strengthens its collaboration with West Africa States in the combat illegal timber trade and wildlife, using appropriate mechanisms under CITES or leveraging other international agreements such as the US-China Joint Glasgow Declaration on Enhancing Climate Action in the 2020s.
- Secretariat issue a notification suspending the trade in *Pterocarpus erinaceus* from countries that have not provided a robust science-based NDF and LAF, or requested a zero export quota.
- CMA-CGM, Maersk, and MSC immediately suspend any timber shipments from Mali and increase the due diligence requirements for the timber trade between West Africa and Asia.

# CITES CONTEXT: A PERSISTENT REGIONAL ROSEWOOD CRISIS

The insatiable demand for hongmu or “red wood,” a rare and valuable category of rosewood used primarily for antique-style furniture in China, has resulted in a sharp decrease in wild rosewood populations globally.<sup>1</sup> Primarily sourced from Southeast Asia prior to 2010, the exhaustion of these forests has led to the rapid expansion of trafficking networks into new frontiers in Africa and Central America.<sup>2</sup> Since 2015, West Africa has become the world’s top hongmu producing region, accounting for the majority of all hongmu log imports to China by volume between January 2015 and December 2021 (Figure 1).<sup>3</sup> According to EIA’s supply chain investigation and intelligence gathering, *Pterocarpus erinaceus*, also known in the region as “kosso,” “keno,” or “bois de vène,” has been by far the primary target of the hongmu trade between West Africa and China.<sup>4,5,6</sup>

In an attempt to curb the fast growing and largely informal international trade in kosso, African governments – in addition to instituting domestic measures like harvest and transport bans – joined forces in 2016 and collectively obtained the listing of the species on Appendix II of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), which took effect in January 2017.<sup>7</sup> The lack of implementation of the listing

requirements in Nigeria, where the CITES permitting process had been turned into a mere “paper exercise,” led to the suspension of the trade in kosso from this country, which took effect in November 2018.<sup>8</sup> The suspension has had a direct impact on international trade (Figure 2). While massive export of the species persists in Sierra Leone, The Gambia, Mali, and Ghana, the four principal exporters of kosso to China between January 2019 and December 2021.

At the 74th meeting of the Standing Committee in March 2022, Parties agreed on unprecedented measures to tackle the violation of the Convention across West Africa. According to the Secretariat’s Notification to the Parties, the West African range States had until April 27, 2022 to demonstrate the international trade complies with the Convention by providing a NDF and LAF or formally stopping the trade by requesting the Secretariat to publish a voluntary zero export quota for kosso. As summarized in a communique by the CITES Secretariat: “*Pterocarpus erinaceus* is listed in Appendix II of CITES, which means its international trade is strictly controlled to prevent it becoming a threat to its survival. Recent studies have shown that illegal harvesting and trade have further reduced numbers of the trees in the wild and this triggered the extra measures.

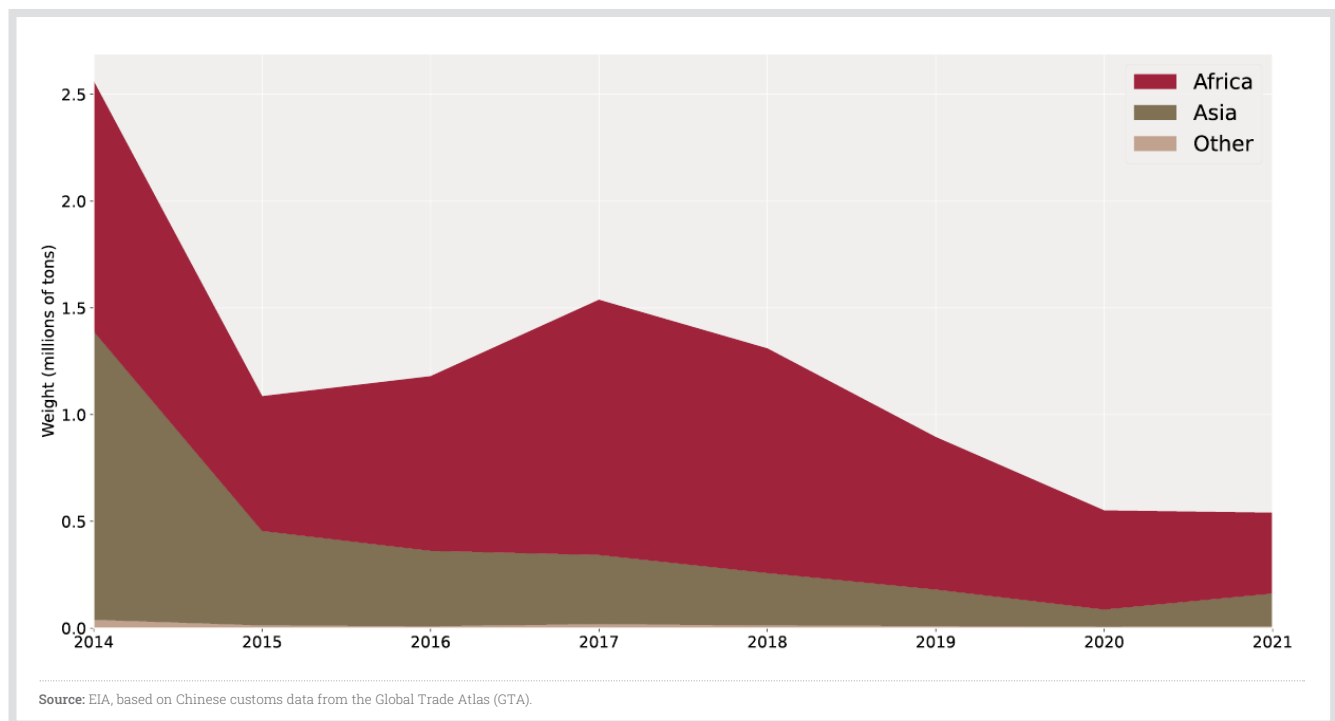
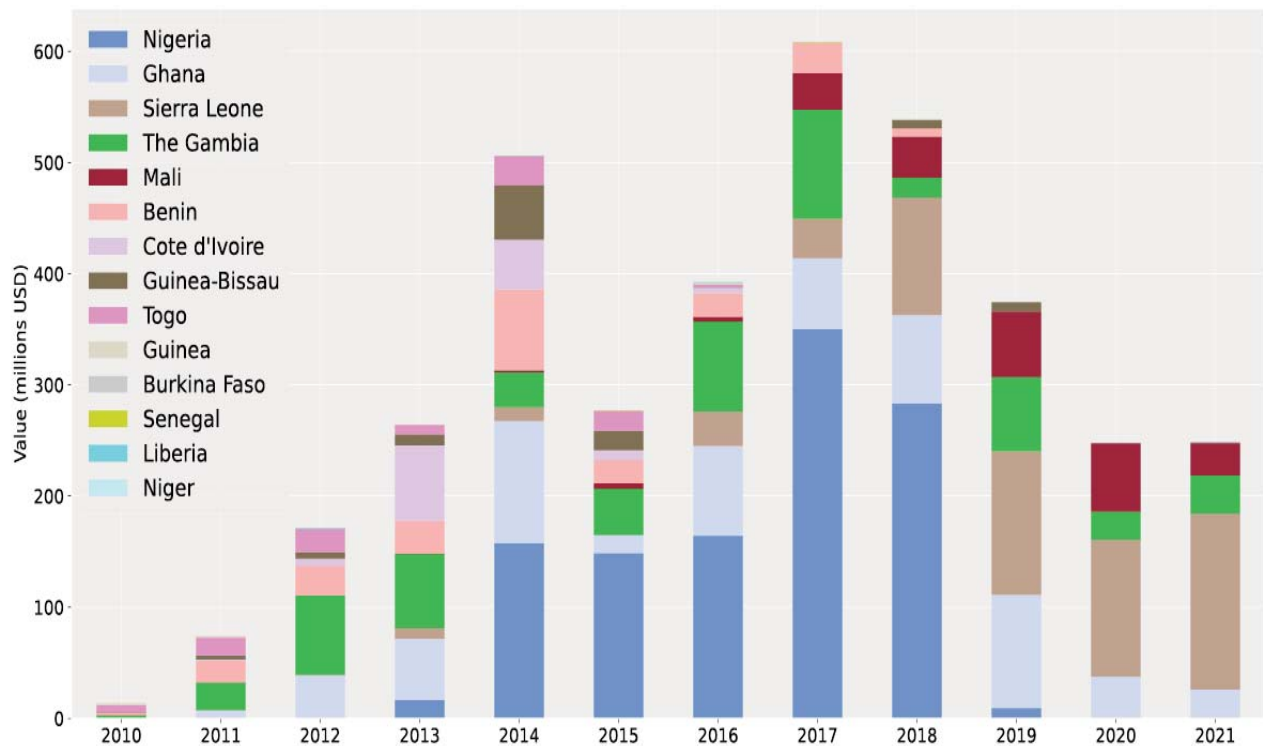


Figure 1  
China imports of hongmu from the world, in value (US\$)



Source: EIA, 2022 based on Chinese customs data from the Global Trade Atlas (GTA).

Figure 2  
China imports of hongmu from West Africa (in US\$)

**Any range States requesting a zero export quota should be commended for their cooperative engagement.**

Unless there are any objections, a complete trade suspension will come into force on the 27th of April to ensure the sustainability and viability of the remaining trees. In the meantime, all states that import *Pterocarpus erinaceus* are being urged to reject any export permits for shipments arriving at their borders and stop any further trade in this species.<sup>9</sup>

At the time of publication the deadline for countries to submit information had passed and information submitted is under review. Any range States requesting a zero export quota should be commended for their cooperative engagement. Few, if any, of the range States have both a Non-Detriment Finding (NDF) and Legal Acquisition Finding (LAF) to demonstrate trade in *Pterocarpus erinaceus* is in full compliance with the Convention. It is therefore essential that a recommendation to suspend trade be established for the remaining countries not able to demonstrate the scientific and legal basis for their exports.

This report, which complements EIA's prior investigative work in Nigeria, Guinea-Bissau, Ghana, Senegal, and The Gambia, focuses on the illegal trade from Mali, where the international trade in kosso has prospered in breach of national laws and CITES rules, to the detriment of local populations.<sup>10,11,12,13</sup>

# JOURNEY FROM THE MALIAN FORESTS TO THE PORTS IN CHINA

Mali's export of kosso to China accelerated in the first quarter of 2017, when the Appendix II listing of the species came into force (Figure 3). Traders told EIA investigators that the exploitation of kosso in Mali started sporadically in 2012-2013 and took hold in the country in 2014-2015, when neighboring countries started to combat the illegal trade.

The forests where kosso naturally grows in Mali are located in the three southern regions, Kayes, Koulikoro, and Sikasso. According to EIA's findings (Figure 4), logging teams first ransacked the forests (Sikasso, Bougouni, and Yanfolila areas) at the border with Burkina Faso and Côte d'Ivoire in the Sikasso province, between 2013 and 2015. Once commercial trees became scarce, the exploitation moved north toward Koulikoro, Kita and Kangaba forest areas (Koulikoro region) from 2015 to 2018. Since 2018, logging squads have focused on the last remaining wild populations of kosso located in the

Malian regions neighboring Guinea and Senegal, specifically Keniéba, Didjan, and Fadougou forest areas.

According to EIA's investigation, the loggers are in most cases not native to the forest areas where they operate. Very often, logging teams include foreign individuals coming from Côte d'Ivoire. Communities who live in the areas where the exploitation takes place are usually not directly involved in the logging. Once felled, each tree is usually cut, on average, into two logs (2 to 2.4 meters long), frequently squared on site before being loaded into trucks (Figure 5).

The trucks bring the freshly cut squared logs to depots located near the capital Bamako and commonly referred to as "sawmills" (Figure 6). Between 2017 and 2020, only one Malian group was allowed to exploit, transport, containerize, and export kosso.<sup>14</sup> This group reportedly includes the logging company Société de gestion

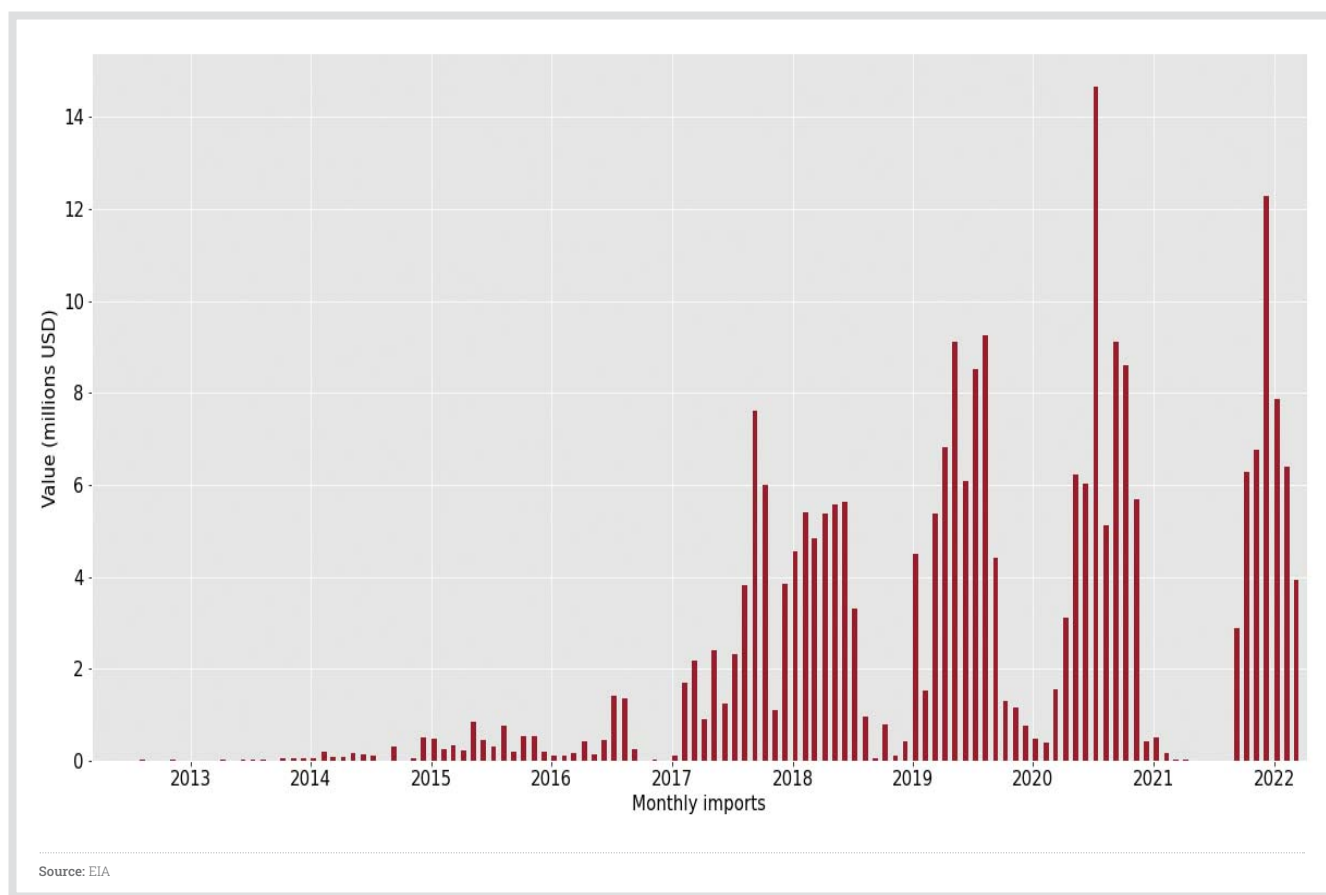
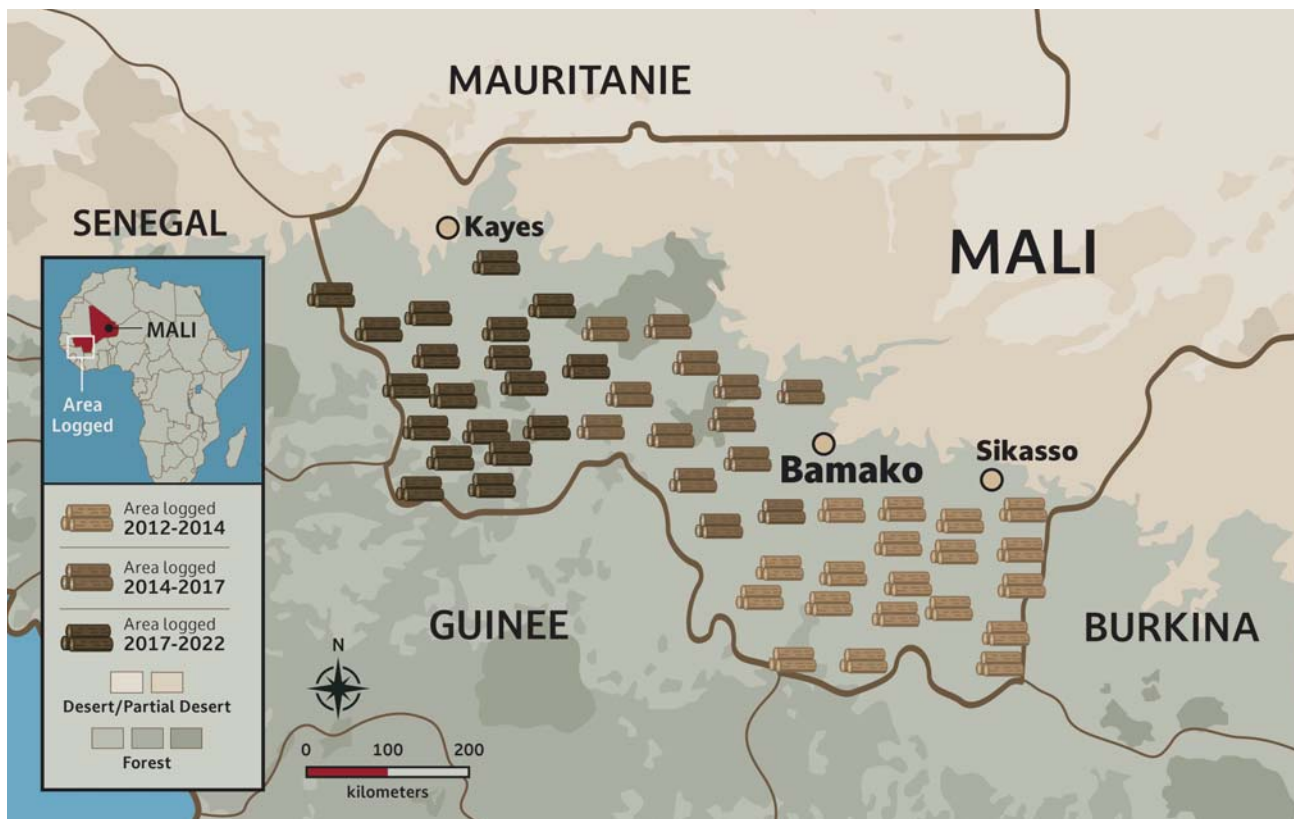


Figure 3  
China imports of hongmu from Mali (in US\$)



Source: EIA

Figure 4  
Displacement of the logging hotspots in southern Mali



Figure 5  
Chainsaw squaring of a kosso log after felling



Figure 6  
Kosso depot near Bamako

forestière Abdoulaye Halidou Cissé (SGFAHC) and the export-oriented company the Générale Industrie du Bois SARL (GIB) that was previously a publicly-owned furniture manufacturer, and is controlled by the Malian entrepreneur Cissé Aboubacrine Sidick.<sup>15,16</sup> GIB is the largest timber producer in Mali and has been by far the largest Malian company involved in the rosewood trade, with a large number of employees and a depot usually packed with dozens of containers during the logging season (Figure 7).<sup>17</sup> According to EIA's investigation and available public sources, during the seasonal peak, in the dry season from October to June, up to 100 chainsaw loggers could be working for GIB in the forest, alongside 300 loaders divided between the forest areas and the depot.<sup>18</sup>

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**During the logging peak season up to 100 chainsaw loggers could be working in the forest for the largest Malian company.**

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Following the coup in August 2020 (cf. Section 4), GIB's monopoly was broken in October 2020. Since then it appears that four other companies, Société Boiserie Farota owned by Mamadou Farota, Société de Gestion de Massif Forestier de BAI SARL owned by Yacouba Diamouténé, Société Africaine du Bois owned by Souleymane Coulibaly, and Societe Albarka Mali owned by Mohamed Elbacary Cisse, have emerged in the rosewood sector. These companies are following GIB's



Figure 7  
GIB's depot



Figure 8  
Locations of the five main kosso depots in Mali



Figure 9  
A container fully loaded by workers



Figure 10  
Trader posing with large kosso logs in GIB's depot

business model by allegedly organizing the logging, transport of the squared logs to the depots, loading into containers, and transport of the containers to Dakar port for their clients. Each of these companies has established its own depot (Figure 8) where the squared logs are loaded into containers (Figure 9).

Larger depots are usually divided into several loading yards where Chinese traders supervise in person the loading of their shipment (Figure 10). The Malian companies involved in the kosso trade take care of the entire exploitation, transport, loading, and export process for their foreign clients who pre-finance the operations. According to EIA's investigation, the largest Chinese traders would pay up to US\$1.7 million per year in down-payments in order to secure their supply. The Malian companies are also responsible for providing their clients with all the necessary documents including the CITES export permits.

Once loaded, the twenty-foot containers are transported via road to the port of Dakar in Senegal, crossing the border at Kidira or Moussala (Figure 11). It usually takes three days for the convoys of trucks to reach the port of Dakar from the depots near Bamako. According to EIA's investigation, major shipping lines, including AP Moller-Maersk (Maersk), Compagnie Maritime d'Affrètement-



Source: EIA

Figure 11  
Three-day journey between the kosso depots in the outskirts of Bamako and the port of Dakar

**Major shipping lines including CMA-CGM, Maersk, and MSC have been involved in the shipping of rosewood between Mali and China.**

Compagnie Générale Maritime (CMA-CGM), and Mediterranean Shipping Company (MSC), have been involved in the transport of the kosso logs between the port of Dakar and Chinese ports. Details about the journey and the processing stages of the kosso logs in China are available in EIA's previous reports.<sup>20,21</sup>

In response to EIA's inquiries, Maersk confirmed that they have transported shipments of *Pterocarpus erinaceus* out of Mali and clarifies that they have relied on Malian customs authority to clear the shipments transported by the company.

EIA did not receive any response to its specific questions to CMA-CGM. The company stated: "Your warning is seriously taken in our Group and we are going to carry out investigations in West Africa and specifically in our agency in Mali."

MSC stated they have a zero-tolerance policy for the carriage of illicit cargoes. However, they did not respond to the investigation's specific findings and stated that they were not in a position to comment "on the details of the report."

# FELLING, TRANSPORTING, AND EXPORTING IN VIOLATION OF THE LAW

The exploitation, transportation, and export of kosso from Mali to China, via Senegal, is rife with illegalities, as detailed in the following paragraphs. EIA's analysis establishes that all exports of squared kosso logs from Mali have been in violation of Malian law since May 2020, as the consequence of a harvest ban (in effect from May 2020 to March 2021) followed by a log export ban regulation (in effect from February 2021 to date) that reaffirms the principles of the Malian forest code in place since 2010.<sup>22</sup> From May 2020 to March 2022, EIA estimates that China has imported over 5,500 containers of kosso in breach of Malian law.

As presented in the previous section, GIB and SGFAHC, both companies controlled by the wealthy entrepreneur Cissé Aboubacrine Sidick, have allegedly been responsible for the the majority of the exploitation and export of *Pterocarpus erinaceus* from Mali. As presented in the paragraphs that follow, it seems that a significant portion of these logging and export operations have taken place in breach of the Malian law. EIA did not receive a response to its multiple inquiries from Aboubacrine Sidick Cissé.

## Illegally Harvested

The decree 10-287/P-RM (July 26, 2010) designates kosso as a "partially protected" species in Mali. As such the species is subject to the legal framework that regulates forest exploitation nationally, the forest code (law 10/028 of July 10, 2010).

According to EIA's findings, a significant share of the volume of kosso felled in Mali is the product of logging operations that have not abided by the national forest code. According to its Article 23, the exploitation can only take place after the Forestry Administration has carried out and updated the inventory of the forest resources, which determines the location and distribution of tree populations intended for exploitation. It appears that logging operations have been carried out based upon an obsolete inventory of the kosso populations, which dates from 2013-2014, the early years of the boom in the selective exploitation of the species in Mali.<sup>23</sup>

Per Article 9 and 22 of the forest code, logging operations must be conducted in accordance with an approved forest management plan ("simplified" for forest areas between 25 and 500 hectares) and exploitation permit. According to EIA's investigation, even though the Malian companies involved in the forest exploitation, transport, and container loading have obtained a management plan and exploitation permit from the competent authority

(Figure 12), multiple reports indicate that logging activities have occurred outside of the authorized areas. Illegal exploitation of kosso has reportedly taken place in protected areas, as the wild populations became scarce, in particular in the Monts Manding and the Keniéba-Baoulé forest reserves.<sup>24</sup> These forested areas were intentionally set aside several decades ago, with the support from local populations, for preservation and controlled use. Reports also indicate illegal logging taking place in cemeteries, against the will of local communities.<sup>25</sup>

In recent years, Kayes provinces has been the hotspot of rosewood logging in the country (cf. Figure 4). Multiple communities have raised their voice denouncing the negative impact of logging on their livelihoods, including during day-long multi-stakeholder meetings organized by local civil society, where community leaders have taken the floor to describe in detail the increase in illegal rosewood logging and gold mining.<sup>26</sup> Wassa-Ton association, in particular, announced that their last resort

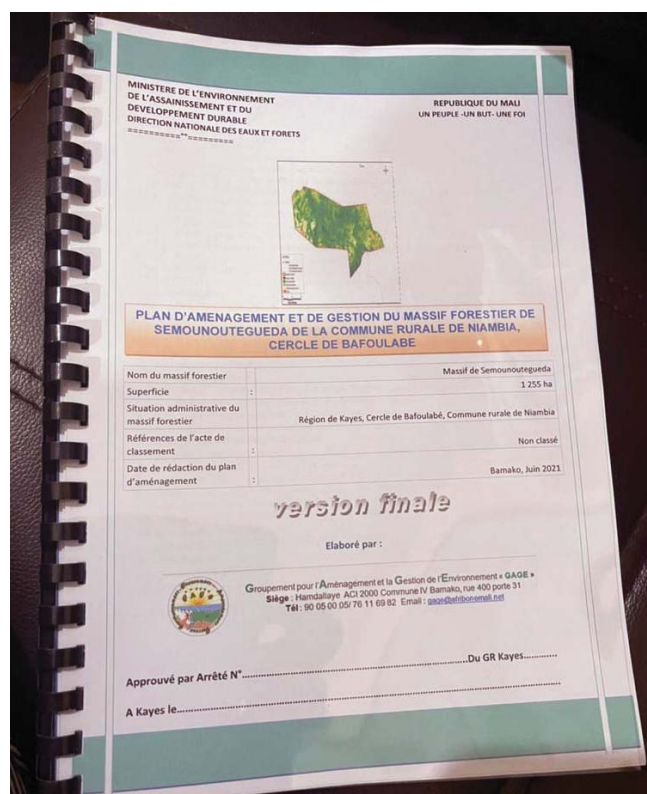


Figure 12  
Example of a forest management plan used for rosewood exploitation

Source: Ministry of Environment, Sanitation and Sustainable Development and Ministry of Industry and Commerce



Figure 13  
Communities in Kayes rise against kosso logging



Figure 14  
National prohibition of lumber and sawn wood exploitation

Source: Ministry of Environment, Sanitation and Sustainable Development and Ministry of Industry and Commerce

to protect their forest was to create local brigades that would be patrolling the areas where the exploitation is the most intense. As communities are taking the protection of the forests into their own hands, the risks of conflict between community members and teams of loggers are increasing in the southern forested provinces (Figure 13).<sup>27</sup>

In May 2020, in order to regain control over the chaotic exploitation of the southern forests, the former Malian Minister of Environment, Sanitation and Sustainable Development, officially suspended the commercial exploitation of kosso.<sup>29</sup> As stated by the Ministry "All lumber and sawn wood exploitation



Figure 15  
Transport authorization issued by the Forestry Administration in October 2020 despite the ongoing harvest ban



Figure 16  
Regulation re-affirming the national log export ban and the prohibition to export square logs from Mali  
Source: Ministry of Environment, Sanitation and Sustainable Development , 2021

activities are suspended in all their forms until further notice, on all national territory.” (Figure 14). The decision was reportedly widely popular.<sup>30</sup> Despite the harvest ban the kosso trees kept being logged and transported widely, frequently covered by invalid documents issued by the Malian Forestry Administration (Figure 15).

The suspension remained valid until Bernadette Keïta, then Minister of Environment, Sanitation, and Sustainable Development, lifted it in March 2021.<sup>31</sup> The decision was criticized by multiple local associations from Kayes, Koulikoro, and Sikasso provinces.<sup>32,33</sup>

## Illegally Exported

Since 2018, Malian civil society organizations, whistleblowers, and local artisans have publicly denounced the legal loophole used by international traders to export squared kosso logs in breach of the national log export ban.<sup>34,35</sup> The Malian forest code prohibits the export of “non processed timber,” per article 39 (provision reinforced by the interministerial decree 2015-1535/CI/MEF-SG of June 5, 2015). However, the lack of definition regarding what does and does not constitute processed timber was used for several years by entrepreneurs to defend the legality of the export of squared logs. The loophole was eventually closed in February 2021 when an interministerial decree established that square logs are not sufficiently processed products and therefore are not allowed for export (Figure 16).<sup>36</sup>

World leading shipping lines, including Maersk and MSC, have been allegedly involved in the transportation

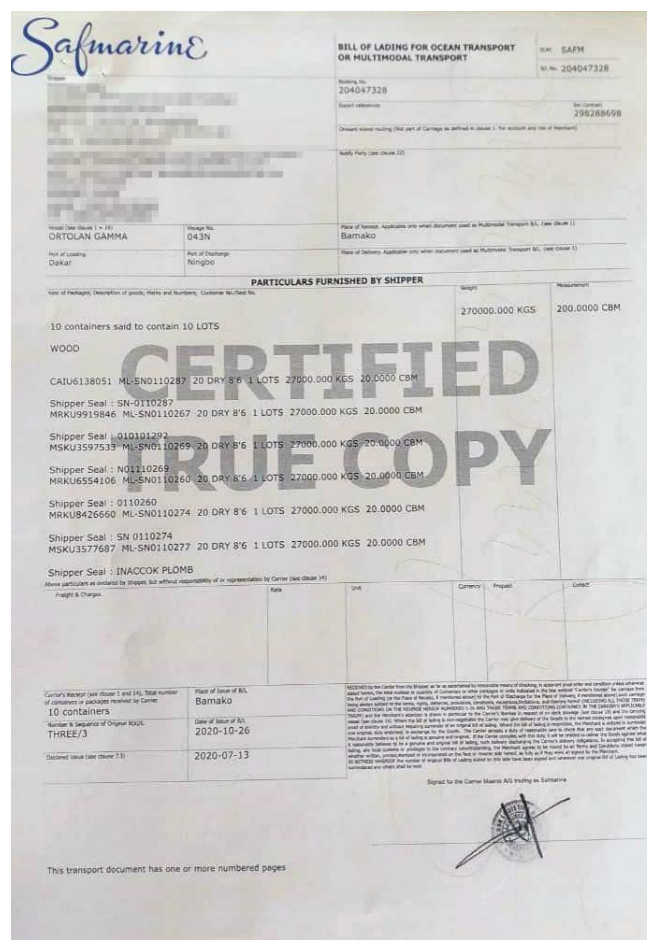
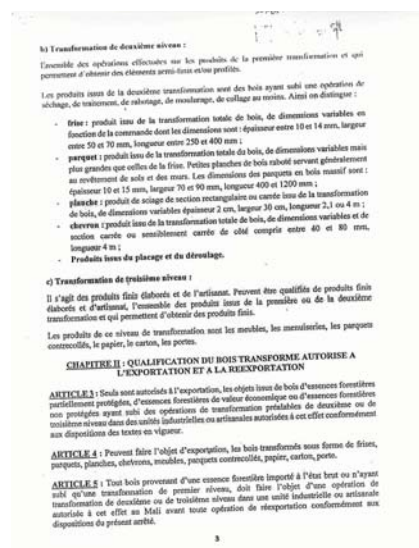
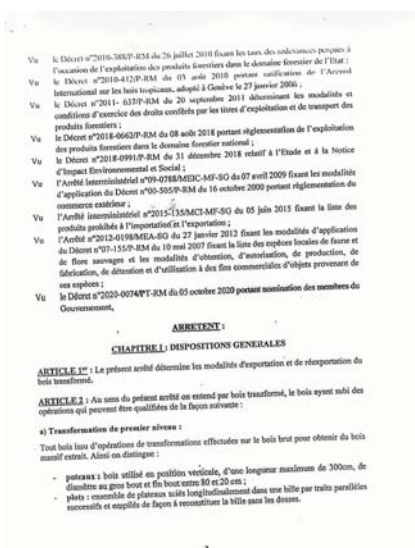


Figure 17  
Bill of lading from the Maersk Group for the transport of kosso between Mali and China

of illegal kosso between Mali and China, after the prohibition on squared log export was made public in February 2021 (Figure 17).

In response to EIA's inquiries, Maersk stated that they cannot comment on whether the shipments that the company transported were squared logs or not (and therefore if it was in breach of the log export ban or not). The company added that, according to their records, they have not had any shipments during the bans in place, as authority approval could not be obtained.

EIA did not receive specific responses to its questions to CMA-CGM. The company nevertheless clarified that "Because our activities can have an impact on biodiversity and unfortunately, may be attractive for some corruption networks, CMA CGM Group has a duty to act for a more responsible international trade.[...] Wherever the Group is present, it operates in compliance with the regulations in force. In addition, we are particularly vigilant in complying with regulations relating to the transport of protected species."

MSC did not respond to the investigation's specific findings and stated that they were not in a position to comment "on the details of the report." They also stated that: "MSC is a responsible and ethical company and has a zero-tolerance policy for the carriage of illicit cargoes, including rosewood, or other CITES-protected flora and fauna, and ivory. MSC would blacklist any shipper or shipping agent discovered to be intentionally abusing its services by trafficking illicit goods in containers. MSC abides by government export-control rules and continuously invests in and updates its cargo screening systems for exports from West Africa."

## Multiple Breaches to the Convention

EIA's research indicates that the international trade in kosso has continuously been prohibited in Mali since May 2020, via an harvest ban in effect from May 2020 to March 2021 and a log export ban regulation effective since February 2021. During this same period, EIA estimates that China has imported over 123,400 tons of kosso - equivalent to approximately 4,500 containers, 365,900 logs, or approximately 182,900 trees.<sup>37</sup> This massive commerce of kosso between Mali and China in breach of domestic bans, while the international trade in this species is supposedly controlled by CITES in order to guarantee its legality and sustainability, raises serious concerns about the implementation of the Convention. According to EIA's findings, this is just one of the problems associated with the implementation of CITES in Mali.

EIA's research indicates that between January 2017 and January 2022, China has imported the equivalent of approximately 543,000 kosso trees from Mali.<sup>38</sup> EIA is not aware that Mali has produced an updated inventory of the kosso populations in the Kayes, Koulikoro, and Sikasso regions for the period 2017-2022, when exploitation and international exports skyrocketed. It is therefore unlikely that the country has a robust science-based determination of the volume that can sustainably be traded internationally under the Convention since 2017. According to the Article IV of CITES, export permits for species included in Appendix II shall be granted only when a Scientific Authority of the State of export has advised that such export will not be detrimental to the survival of the species (a determination known as a "non-detriment finding" or NDF).<sup>39</sup> According to EIA's

### BOX 1.

## VIOLATION OF CITES ARTICLE IV: A REGIONAL PROBLEM

The August 2019 report commissioned by the CITES Secretariat, and prepared by the United Nations Office on Drugs and Crime (UNODC), establishes that "very few countries in West and Central Africa have the capacity for making robust scientific-based non-detriment findings, no range State of *Pterocarpus erinaceus* demonstrated that the provisions of Article IV were being met."<sup>43</sup>

The report provides key insight into the context of the trade in kosso across the region, in particular: "... an important characteristic of the illegal rosewood market is the significant amount of money involved. The report notes that the profits generated are far greater than in the case of most other illegal wildlife markets. It also states that with the increase in gains comes a greater tendency for illegal loggers and traders to use violence to protect their illegal industries. The report notes that forestry officials are generally unarmed, and that in some regions those interviewed indicated that

enforcement in the field is often simply too dangerous for them to undertake."

Furthermore, the report recommends that Parties in West and Central Africa "with domestic legislation in place prohibiting the export of timber and timber products, including from *Pterocarpus erinaceus*, establish a voluntary 'zero export quota' for *Pterocarpus erinaceus* in accordance with Resolution Conf. 14.7 (Rev. CoP15) on Management of nationally established export quotas." This recommendation was supported by the CoP18 Decision 18.88.

Building on these findings and further research, the September 2020 report prepared by WCMC-UNEP for the Secretariat and the Plants Committee, recommends that the seven countries categorized as "Action is Needed" are encouraged "to implement zero quotas in order to strengthen their export controls."<sup>44</sup>



Figure 18  
Invalid CITES export permits

research, it is highly likely the international trade in kosso between Mali and China, since 2017, has taken place in violation of the Convention.

The concerns regarding non-compliance of the international trade in kosso between Mali and China are shared by multiple experts, including the United Nations Environment Programme (UNEP) and the World Conservation Monitoring Centre (WCMC). A study commissioned by the Secretariat and carried out by UNEP-WCMC indicates that in Mali "it is unclear how harvest quotas are set and whether there is any scientific basis for non-detriment findings; therefore categorized as "Action is Needed." Other issues not related to the implementation of Article IV include illegal trade and exports of timber.<sup>40</sup>

Mali is one of seven countries (with Benin, Gambia, Ghana, Guinea Bissau, Mali, Nigeria and Sierra Leone) that were categorized as "Action is needed" on the basis that available information suggests that the provisions of Article IV are not being implemented. This appears to be the rule rather than the exception in West Africa (Box 1).<sup>41</sup> As of the 25th Meeting of the Plants Committee in June 2021, none of these countries had produced a scientifically robust non-detriment finding.<sup>42</sup>

According to EIA's investigation, invalid CITES permits have been used to export kosso from Mali to China, via Senegal. In July 2021, CITES certificates without Malian customs' seal were used to export kosso from Mali. The pictures presented in Figure 18 were taken in Senegal. They show three different CITES permits, respectively numbered 3205, 3183, and 3185, which were used for the international trade in kosso. As shown in Figure 18, block number 14 in the form was left blank, despite the fact that this permit was accompanying a shipment that had left Mali and was en route to the Dakar port. Per CITES rules, block number 14 is supposed "To be completed by the official who inspects the shipment at the time of export or re-export. Enter the quantities of specimens actually exported or re-exported. Strike out the unused blocks." The same goes for block number 15, reserved for the bill of lading number, which was left blank.

According to the EIA's investigation, there was also a discrepancy between the volume of kosso officially stated in the documents and the volume actually transported that day. EIA's source estimated that the discrepancy was equivalent to approximately 15-20 percent of the volume stated in the permit. This apparent misdeclaration scheme could be one of the factors that explain the discrepancy between the volume of kosso exported from Mali as declared by Malian authorities under CITES versus the volume imported into China/Vietnam as declared by Chinese and Vietnamese authorities under CITES. As shown in Figure 19 between 2017 and 2021, China and Vietnam have reported the import of 40 percent more kosso than Mali's reported export under the Convention.

According to information collected by EIA, it appears that in February 2022, the use of invalid CITES permits for the international trade in kosso from Mali was identified and questioned by Togolese authorities during the transshipment of containers filled with kosso in the port of Lomé. According to information obtained by EIA, Togolese authorities stopped 157 containers for several days. It is unclear what happened with these containers.

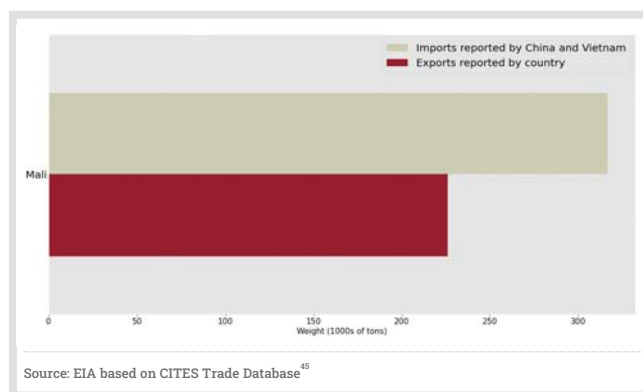


Figure 19  
China imports of hongmu from Mali (in US\$)



## CONDUIT FOR OTHER CRIMES



Figure 20  
Ivory tusk offered for placement in a rosewood log

The findings presented in the previous sections are just a fraction of the illegalities associated with the trade in kosso between Mali and China, as presented in the following paragraphs.

### Ivory Trafficking

EIA investigators learned that the kosso trade has also been a conduit for ivory trafficking between West Africa and China. According to an EIA well-placed source, Chinese rosewood trader “Frank” and his business partner have allegedly been involved in a multi-year ivory smuggling operation between Mali and China. According to an ivory trafficker who spoke to EIA investigators, “Frank” and his partner started hiding ivory in kosso logs in Mali in 2015 (Figure 20). EIA investigators were told that the majority of the ivory, up to three quarters according to a trafficker, comes from Southern Malian regions (Sikasso, Bougouni, Yanfolila, Kangaba, Kolondieba, Manankoro) and neighboring countries (Côte d’Ivoire, Ghana, Burkina, Faso, Benin, and Guinea), via a well-established regional trafficking network. The remaining tusks originate from the Center region of Mali, where remnant populations of desert-adapted African elephants (*Loxodonta africana*) are targeted by poachers.<sup>46</sup> The so-called Gourma elephants are Africa’s northernmost population, known for their annual circular migration that crosses Mali and represents the longest known elephant migration circuit in the world (Figure 21).<sup>47,48</sup> These desert elephants have been described as “on the edge of annihilation.”<sup>49</sup>



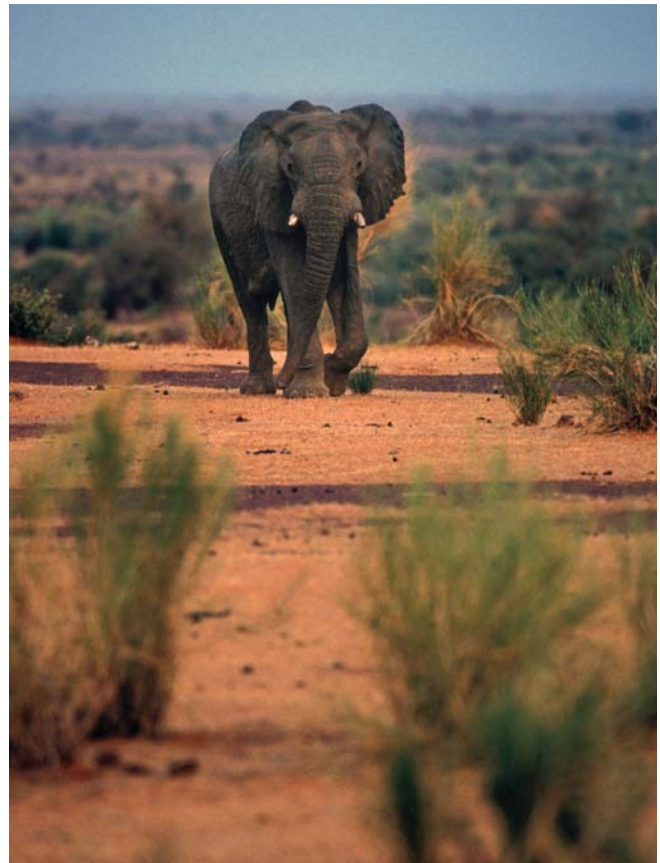
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## BOX 2.

### MULTI-TRAFFICKERS' PROFILE

"Frank"'s business partner told EIA investigators that he originates from Fujian province in China, now living in both Guinea and Mali. He claims to be the largest kosso trader in Mali, with operations dating 2013. He explained to investigators that in order to meet the skyrocketing domestic demand in China, he has worked with all Malian kosso suppliers he could find. He is one of GIB's largest clients, if not the largest. He and his partner are allegedly responsible for the export of over 60 containers monthly, on average. According to a well-informed EIA source, he is also allegedly involved in donkey skin trafficking from Mali to China, in violation of Malian laws.<sup>50</sup>

His father, who is not accused of any wrongdoing, is a prominent figure of the Overseas Chinese Federation of Guinea and of the Sino-Guinean Agricultural Cooperation and Development Company (SIGUICODA). SIGUICODA is a joint venture between China National Agricultural Reclamation Corporation - a State-owned company - and the Guinean government.



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Figure 21  
Gourma elephants



Figure 22  
An ivory cache covered with clay in a marked kosso log, at the back of a container

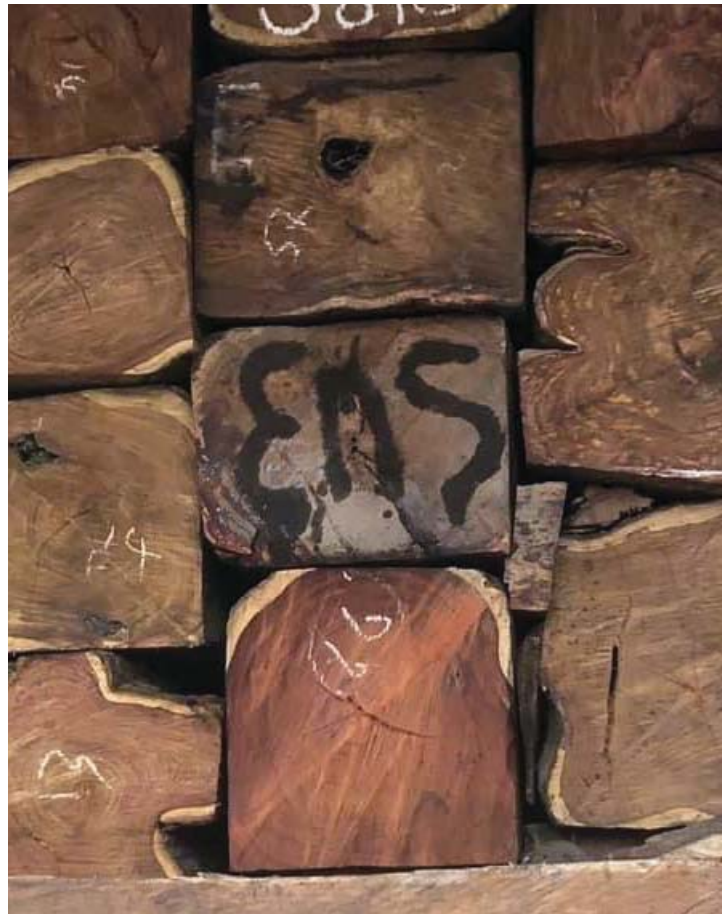


Figure 23  
Check allegedly offered by GIB to the Civil Society of Keniëba association

Poachers transport the ivory in small batches into Mali, usually hidden in cars that travel to Bamako. Poachers are responsible for inserting the ivory in the kosso logs, which usually takes place into a reserved yard that "Frank" and his business partner control within the GIB depot (cf. Figure 7). The insertion of the ivory occurs according to two modalities. "Small pieces" (no bigger than ten centimeters) are buried in holes drilled in the

hardwood. Larger lots of ivory, up to ten tusks, are inserted in split kosso logs. A mixture of clay and kosso sawdust is applied in order to hide holes and splits. According to someone involved in the operation, "When it is done, it is impossible for you to see it." (Figure 22). Each shipment of ivory would be up to one ton, with an average price of ivory paid by Chinese traffickers of 300,000 CFA (~\$US 500) per kilogram. According to traffickers who spoke to EIA investigators, the same timber cache stratagem is also used to smuggle ivory from Ghana and Côte d'Ivoire to China.

Multiple recent reports from West African journalists and non-profit organizations corroborate the information obtained by EIA investigators.<sup>51,52,53</sup> The existence of a regional ivory trafficking network that connects Côte d'Ivoire, Ghana, and Mali, has raised concerns across the region and has led to several seizures and arrests.<sup>54,55,56</sup>

## Silencing Communities

In Mali, resistance from local communities has been one of the main limiting factors of the rosewood illegal trade. Community leaders have repeatedly raised awareness about the accelerated destruction and degradation of their forests. Aliou Diallo, the president of Wassa-Ton

association in the Kayes region stood up in April 2021: "No tree will be cut this year in the municipality of Keniéba. In the last three years, more than 800 billion FCFA [US\$13.8 million] have been made in the exploitation of timber in the municipality. Despite this colossal sum, we see no school, no health center for the community." (Figure 13)<sup>57</sup>

Frequent reports from communities, covered by local and national media, have led Malian government delegations to carry out official visits in the areas plundered by traffickers, in order to witness the extent of the forest destruction and hear communities' grievances.<sup>58</sup> EIA investigators learned that, as the growing public attention paid to the recurrent problem started to pose a serious challenge for the business, GIB offered to support the Civil Society of Keniéba association with the unsolicited sum of US\$5,200 (equivalent to 3 million FCFA) (Figure 23). EIA contacted the Civil Society of Keniéba association for comment, but they did not confirm that they were offered this unsolicited payment.



Figure 24  
Front page of Malian newspaper denouncing GIB's monopoly over international kosso trade

Source: Screenshot from L'investigateur<sup>60</sup>

## Corruption and Collusion

Corruption and collusion practices have contaminated a large portion of the kosso supply chain in Mali. It starts at the local level, where according to reports by community leaders, local Forestry Administration agents look the other way when forests are destroyed, in spite of the recurrent complaints filed by community members. In 2018, the president of the association Kotronani Sanès publicly accused forest agents located in Siby, Naréna, and Sobra municipalities, of complicity in the illegal harvest.<sup>59</sup>

Bribing schemes also appear to involve much more powerful public servants and large systemic issues in the Malian forest sector. The longstanding monopoly of the kosso trade held by GIB until October 2020 has been publicly criticized (Figure 24). According to EIA's information, GIB's monopoly and business model based on the alleged violation of Malian laws has relied on a web of apparent collusion and corrupt officials. A well-placed source explained to EIA investigators that a multi-administration bribing operation has allegedly been going on for years, following a well organized pattern. This source alleges that several times a year, a specific employee from GIB allegedly distributes bundles of cash around the city of Bamako, stopping by the offices of key civil servants, one after another, and following a determined circuit that is usually completed over 4-5 hours. Although the total amount distributed over the years is difficult to estimate, in one particular instance, 40 million FCFA (equivalent to US\$69,400) were allegedly distributed among members of the Ministry of the Environment, Sanitation and Sustainable Development and Forestry Administration (Water and Forests Service). The former National Director of water and forests - currently General Secretary of the Ministry of the Environment, Sanitation and Sustainable Development, Mamadou Gackou, allegedly received 15 million FCFA (US\$26,000) that day. It appears that GIB has also recruited several relatives of well-placed decision

**GIB's monopoly and business model based on the alleged violation of Malian laws has relied on a web of apparent collusion and corrupt officials**



Common way containers are packed with kosso squared logs in Mali for their export to China

makers, including the nephew of the current director of the Forestry Administration (Water and Forests service) Ousmane Sidibé.

EIA did not receive a response to its multiple inquiries from Mamadou Gackou or Hamadi Sidibé.

## In Service of Jihadists' Propaganda

The rosewood crisis in Mali is not happening in a vacuum. Since 2012, Mali has faced a succession of violent conflicts, with three coups in a decade (two of them since June 2020) and a jihadist insurgency. Rebels captured large areas of northern Mali in 2012, triggering an insurgency that has now spread to neighboring Sahelian countries.<sup>61</sup> Jihadists are in control of the north of the country and are currently fighting to extend their territory to the center of Mali.<sup>62</sup>

The national socio-economic imbalance is striking in Mali. In 2018, 75 percent of civil servants (including teachers and nurses) were in the capital, where the government spends on average about 80 percent of its annual budget, even though it is home to roughly 13 percent of the population.<sup>63</sup> The turmoil in Mali is notably

rooted in wide-spread loss of faith by citizens in their institutions and decision makers. In 2020, after the government claimed victory in a questionable legislative election, thousands of people took to the streets in protest. They were protesting not just about the election but also about corruption. It appears that a large part of the population supported the coup in August 2020.<sup>64</sup> "Elections have given us what for 30 years? Endemic corruption, lethargy and nepotism," says Oumarou Diarra, a former Imam who is now in the government.<sup>65</sup>

Many Malians believe that talks with jihadists are the way forward for the country. Supporters of the rebels have exploited the forest crisis and the frustration among the population in the Southern provinces as a way to promote their cause. They frequently allege that only the strict discipline of the jihadist can put an end to the rosewood crisis and the circles of grand corruption it has fueled. These allegations are frequent on social media platforms, with narratives that read like these: "The forests today are well protected by the jihadists otherwise all the rest is blah blah." or "ISLAM ALONE PROTECTS LIFE. These prerogatives [fight against corrupt ministers] must be given to the jihadists. [...]. They prohibit the cutting of trees and everyone is required to respect the rule."<sup>66</sup>

## CONCLUSION AND RECOMMENDATIONS

According to EIA's new investigation, the international trade in kosso is riddled with illegalities, including illegal harvest, illegal export, and frequent CITES frauds. The massive trade has reportedly led to a significant decline of the species in various Southern forest regions in Mali. It has also been exploited by traffickers to routinely smuggle tons of ivory between Mali and China.

EIA has previously documented illegal logging and trade of kosso rosewood in various countries across West Africa, including Senegal, Gambia, Guinea Bissau, Ghana, and Nigeria. The rosewood crisis is a regional problem and needs to be addressed as such. The state of affairs in Mali and more broadly in West Africa therefore calls for an urgent comprehensive and meaningful response to the rosewood crisis.

Unprecedented action was taken by the CITES Standing Committee at their 74th meeting in March 2022 in response to calls from range States.. Due to ongoing and pervasive illegal trade in *Pterocarpus erinaceus*, the Standing Committee requested the Secretariat undertake an expedited compliance procedure under Article XIII. Countries were given 30 days to either demonstrate that their exports are legal and sustainable or set a zero export quota. If countries fail to do so, they will face a trade suspension.

At the time of publication the deadline for countries to submit information had passed and information submitted is under review. Any range States requesting a zero export quota should be commended for their cooperative engagement. Few, if any, of the range States have both a Non-Detriment Finding (NDF) and Legal Acquisition Finding (LAF) to demonstrate trade in *Pterocarpus erinaceus* is in full compliance with the Convention. It is therefore essential that a recommendation to suspend trade be established for the remaining countries not able to demonstrate the scientific and legal basis for their exports.

### **EIA recommends that:**

- Mali stops exporting *Pterocarpus erinaceus* and requests the Secretariat to issue a voluntary zero export quota, until Mali provides both a science-based non-detriment finding (NDF) and legal acquisition finding (LAF) to the CITES Secretariat and Chairs of the Standing Committee and Plants Committee.
- Senegal, Togo, and other re-exporting Parties undertake due diligence in compliance with the CITES rules before issuing any re-export permits.
- China and Vietnam stop importing *Pterocarpus erinaceus*, based on concerns related to the sustainability and legality of international trade.
- China strengthens its collaboration with West Africa States in the combat illegal timber trade and wildlife, using appropriate mechanisms under CITES or leveraging other international agreements such as the US-China Joint Glasgow Declaration on Enhancing Climate Action in the 2020s.
- Secretariat issue a notification suspending the trade in *Pterocarpus erinaceus* from countries that have not provided a robust science-based NDF and LAF, or requested a zero export quota.
- CMA-CGM, Maersk, and MSC immediately suspend any timber shipments from Mali and increase the due diligence requirements for the timber trade between West Africa and Asia.

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**EIA US**

PO Box 53343  
Washington DC 20009 USA

**T:** +1 202 483-6621

**E:** [info@eia-global.org](mailto:info@eia-global.org)

**[eia-global.org](http://eia-global.org)**