

TRAFFICKERS AT THE STARTING BLOCKS

Consequences of a Premature
Lifting of the Zero Export Quota
for *Pterocarpus erinaceus* in
Sierra Leone and its Impacts on
Neighboring Countries

July 2024

EIA RECOMMENDS:

- **Plants Committee:** recommend to extend zero export quotas for range states where they are currently in place, until at least the proposed NDF and LAF workshop for range states, and until stockpiles are reliably and transparently inventoried and secured.
- **Government of Sierra Leone:** document the legal status, including the location of harvest, of the stockpiles and conduct a technology-based inventory allowing full traceability and transparency of the “controlled” stockpile using technologies that are known to EIA to exist and be adapted to the situation; maintain a voluntary zero export quota until stocks have been reliably and transparently inventoried and secured and an adequate Legal Acquisition Finding has been completed.

SUMMARY AND RECOMMENDATIONS

EIA supports the concerns raised in PC27 Doc. 15.3 by the Plants Committee’s North American and European representative regarding non-detriment findings submitted by Ghana and Sierra Leone, in particular regarding Sierra Leone’s stockpiles. As the review notes, the “legal status and disposition of the ‘pre zero export quota harvested stocks’ of *P. erinaceus*...is not clear,”¹ due for instance to the lack of information about volume, timing, and location of harvest. EIA’s investigation indicates that these concerns are well-founded, in light of new evidence of laundering of freshly-cut timber from Guinea through Sierra Leone’s stockpile in preparation for an expected lifting of the zero export quota. Given the findings of EIA’s investigation and ongoing concerns related to regional trafficking of the species, lifting the zero export quota in Sierra Leone would have consequences far beyond its borders. Inventorying, securing, and ensuring transparency of the outstanding rosewood stockpile should be a condition sine qua non for the lifting of the export quota and the disposal process in Sierra Leone.

REGIONAL CONTEXT: GOOD NEWS FOR TRAFFICKERS

Trade in *Pterocarpus erinaceus*, an endangered species of rosewood found in the dry savannahs of western and central Africa, has been effectively suspended under CITES since Parties were notified in March, 2022 to “reject all export permits concerning *Pterocarpus erinaceus*, based on concerns related to the sustainability and legality of the international trade in specimens of that species.”² A full trade suspension came into effect in June, 2022.³ However, since the implementation of the regional suspension, several countries with documented trafficking and trade in the species⁴ have been working to prematurely reopen trade without having the necessary conditions in place.⁵ These efforts have led to the partial lifting of the trade suspension for Mali in April, 2024.⁶ Non-detriment findings submitted by Sierra Leone and Ghana are on the agenda to be considered at the meeting of the Plants Committee in July, 2024.⁷

EIA supports the concerns raised by the Plants Committee’s North American and European representative regarding the non-detriment findings submitted by Ghana and Sierra Leone. The review notes the “legal status and disposition” of these stockpiles is unclear, and that the NDF submitted by Sierra Leone “does not provide information about the harvested wood in question such as the volume, timing, and location of

harvest.”⁸ EIA’s investigation indicates that these concerns are well-founded, as timber traffickers are already laundering freshly-cut timber through Sierra Leone’s stockpiles.

These concerns are particularly urgent because the regional nature of the trade suspension has been largely effective in stemming the illegal regional trade in *Pterocarpus erinaceus*, with China’s imports of the species at by far their lowest level since 2011 (Figure 1). Yet trafficking and smuggling of the species have persisted. As EIA noted in its November 2023 report *Opening the Rosewood Pandora’s Box*, the notification from the CITES Secretariat of a full suspension of trade in June, 2022 appeared to trigger a rush for exports, in violation of the provisional suspension that had already been in force for three months prior to this Notification.⁹ In July and August of 2022 alone, China imported more than 62,000 metric tons of rosewood from Sierra Leone and more than 15,000 metric tons from the Gambia.¹⁰ Regional trafficking networks also persisted in exporting the species - albeit in much smaller volumes - despite the suspension.¹¹ Notably, a report emerged as recently as June of 2024 of 422 containers shipped from Guinea to Malaysia, allegedly in breach of the current trade suspension.¹² In this context, the trade suspension plays a vital role in stemming the tide of illegal trafficking and laundering of the species - a role that would be undermined entirely by the lifting of the zero export quota for Sierra Leone’s stockpiles.

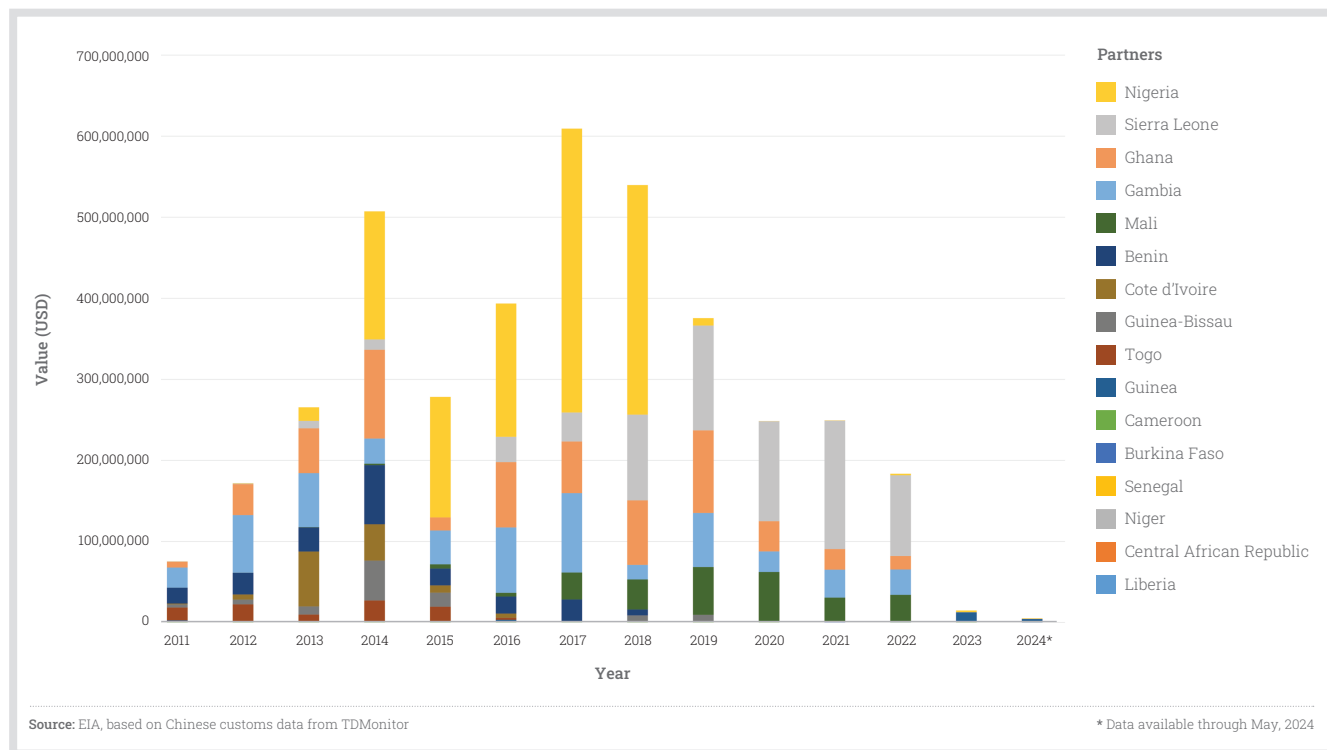


Figure 1
China’s annual imports of hongmu from *P. erinaceus* range states by value.

TRAFFICKERS ARE GEARING UP FOR THE REOPENING OF THE ROSEWOOD TRADE FROM SIERRA LEONE

New evidence obtained by EIA indicates that timber traffickers in Guinea and Sierra Leone are using the expected decisions to lift the zero export quota for certain countries to smuggle freshly cut trees in violation of the ban and the larger Convention. A source explained to EIA investigators that wood has been cut in Guinea and transported by pickup trucks into Sierra Leone, before being unloaded at temporary unloading points on the Sierra Leone side of the border, where six-wheel trucks come to collect the wood. These trucks then transport the wood to one of three depots in Sierra Leone, in Kono, Kabala, and Kamakwie. From there, the rosewood is loaded into trailers and transported to Freetown, where, if trade reopens, the wood would be loaded into containers bound for China.

EIA investigators also learned that after the logging and transport of rosewood in Sierra Leone had mostly died down two years ago, it had recently resumed, due to the perception that a lifting of the suspension was imminent:

EIA: Has it [the demand for rosewood] kept up, or did it stop two years ago?

Trafficker: Until now, it had stopped here. But they gave the order to work, that the wood must come again. Association people [from the Timber Association of Sierra Leone], they said that the work is starting, we can make the wood come to Sierra Leone.

EIA: I don't understand.

Trafficker: I spoke with association people, high-level people, who say that we can send new wood.

EIA: In Sierra Leone or in Guinea?

Trafficker: Sierra Leone, Guinea, both countries work. I'll take the wood, load it, and bring it to Sierra Leone."

These explanations from rosewood traffickers indicate that the trade in the species has picked up in recent months due to the perception that the zero export quota will be lifted, despite the fact that the lifting of the suspension would theoretically only apply to Sierra Leone's stockpiles of *P. erinaceus*. While on paper Sierra Leone's proposed resumption of trade in *P. erinaceus* would restrict it to exporting only its existing stockpiles, in practice these stockpiles are not secured and are highly vulnerable to laundering. Indeed, multiple sources confirmed to EIA investigators that some of the original stockpile has since rotted. One source explained that due to the rotting of the stockpile, timber laundering of newly cut wood from Guinea as well as Sierra Leone would be necessary in order to meet demand:

EIA: If the exporting starts now, will they only export the old wood? Or will they be obliged to fill it out with new wood?

Trafficker: They come with new wood. In Guinea, I have to get out good quality rosewood."

MISMANAGEMENT AND TRAFFICKING OF ROSEWOOD STOCKPILES: LESSONS FROM MADAGASCAR

The premature reopening of the trade is highly problematic in the West African regional context, where stockpiles are vulnerable to laundering of wood from within the same country or indeed from across the region. This situation recalls the case of Malagasy rosewoods (*Dalbergia spp.*) in the 2010s. As with *Pterocarpus erinaceus* from West Africa, Malagasy rosewoods were initially listed in Appendix II, before being subject to a zero export quota due to concerns over implementation of that listing.¹³ As with Sierra Leone's stockpiles of *P. erinaceus*, EIA provided robust evidence of timber laundering via loosely controlled rosewood stockpiles in Madagascar despite the existence of a zero export quota.¹⁴ And as with ongoing trade of *P. erinaceus* despite the trade suspension for the region, EIA documented ongoing trade of Malagasy rosewoods while the country had a zero export quota in place for those species.¹⁵

The precedent of Malagasy rosewoods suggests that lifting the zero export quota for *P. erinaceus* and further opening trade would be a disaster for the remaining wild populations of the species. Given the historical parallels, Madagascar's experience of a poorly-secured rosewood stockpile being used to launder freshly cut trees is a cautionary tale for the management of *P. erinaceus*. Indeed, the situation for *P. erinaceus* is even more perilous because range States have contiguous and largely porous borders, across which EIA and others have documented trafficking of *P. erinaceus*.¹⁶

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