

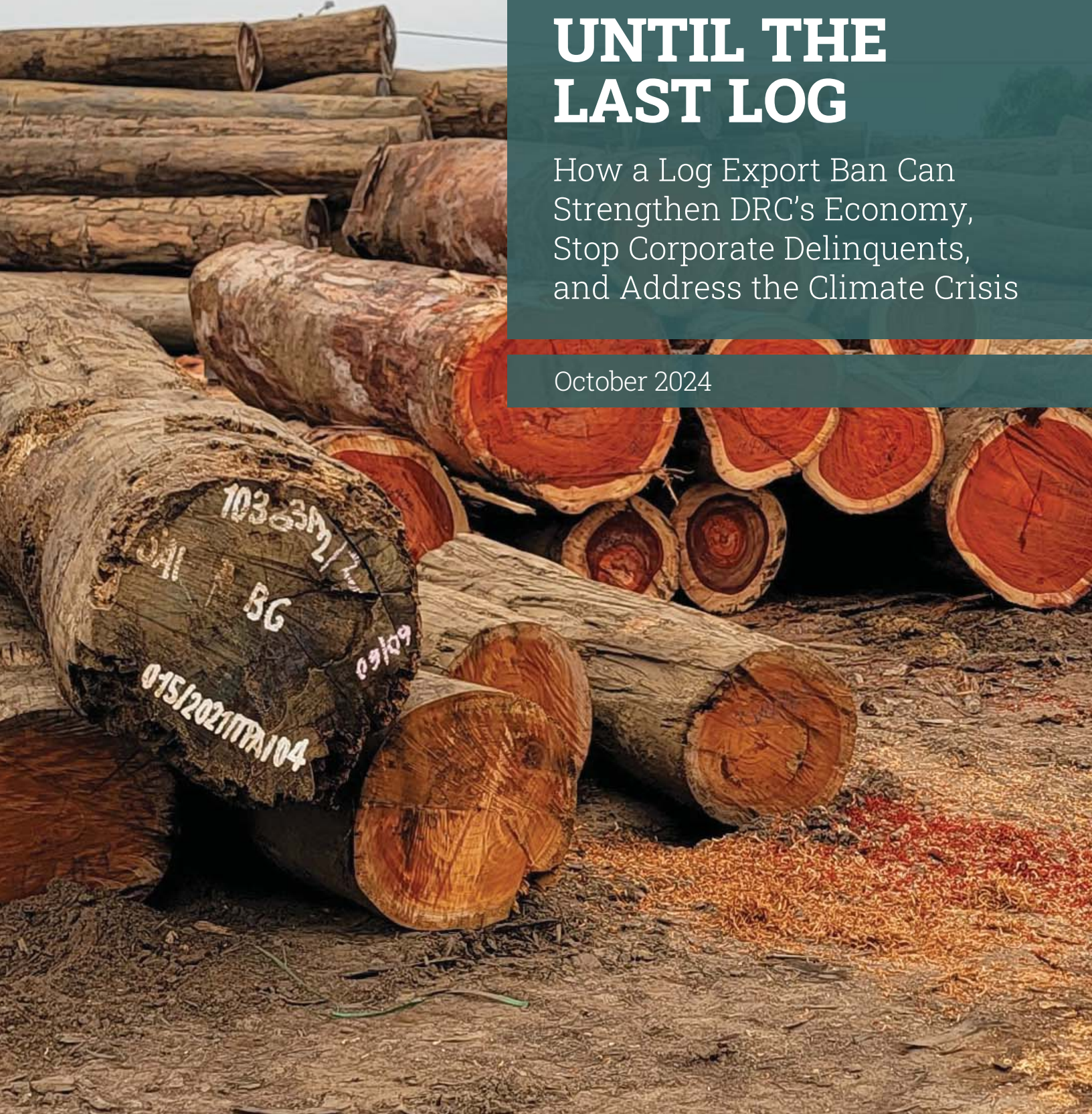


environmental  
investigation  
agency

# UNTIL THE LAST LOG

How a Log Export Ban Can  
Strengthen DRC's Economy,  
Stop Corporate Delinquents,  
and Address the Climate Crisis

October 2024





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## 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.

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Unless otherwise noted, the sources for the report are EIA's internal investigative notes, photos, audio and video evidence collected during the investigation.



## EXECUTIVE SUMMARY

Analysis from the Environmental Investigation Agency (EIA) indicates that the largest industrial logging companies operating in the Democratic Republic of the Congo (DRC), Wan Peng and Booming Green, are engaged in apparent forest crimes and corruption to meet their clients' demand for unprocessed logs.

The practices employed by Wan Peng and Booming Green indicate that - in the absence of an enforced ban on the export of unprocessed logs - industrial logging is contributing little to the economy, imperiling the DRC's status as a climate "solution" country, and undermining regional efforts to address governance challenges in the forestry sector.

DRC is home to approximately 60% of the Congo Basin rainforest, the second-largest tropical forest in the world. The conservation of this rainforest - which absorbs some 1.5 billion tons of CO<sub>2</sub> every year, equal to roughly 3.75% of global emissions in 2022 - is critical to addressing the global climate crisis. Yet these critical ecosystems are threatened by deforestation and forest degradation: one recent estimate suggests that at the current rate of deforestation, more than a quarter of undisturbed forestlands in the Congo Basin could be deforested by 2050.

Logging is a key driver and catalyst of deforestation and forest degradation in the region and threatens to create more lasting impacts on forest landscapes than other informal drivers. The environmental impacts of logging are exacerbated by governance challenges in DRC's industrial logging sector, which has for years been characterized by significant and systemic reported illegalities. These apparent illegalities have been fueled by sustained demand from China's wood processing industry for unprocessed logs, which is increasingly turning to the DRC as the exporter of last resort in the Congo Basin.

In recent years, two Chinese-owned industrial logging giants that export almost exclusively to China - Wan Peng and Booming Green - have acquired significant holdings in the country's forestry sector. These two

companies, the largest industrial loggers in DRC by area of their holdings, control over 3 million hectares of forest concessions, an area greater than the size of Belgium. EIA's investigation into these two companies has revealed that their practices - and indeed their business model - are emblematic of the worst tendencies in DRC's industrial logging sector. Company representatives described practices which involve routinely breaking DRC's forestry laws. They also explained that there is one respect in which DRC is a standout destination for tropical logs: the fact that companies have the freedom there to export any and all timber in the form of raw, unprocessed logs.

Managers from these companies described to EIA investigators how they engage in a wide array of activities that constitute forest crimes and corruption in order to meet their clients' demand for unprocessed logs. These include the routine violation of both companies' harvesting quotas; the misdeclaration of species to facilitate overharvesting in order to satisfy clients in China; and the routine payment of bribes to cover up illegalities. A manager at Wan Peng also admitted that the company obtained a concession in DRC by paying a bribe to "the General," an apparent reference to General Gabriel Amisi Kumba, who has been sanctioned by the U.S. and EU for human rights abuses. Wan Peng employees also showed EIA investigators piles of logs freshly smuggled from the neighboring Republic of Congo, where a log export ban has recently been adopted. (EIA reached out to Wan Peng, Booming Green, and the government of DRC for comment, but had not received a response at the time of publication.)

EIA's investigation further revealed that the ability of forestry operators to export logs plays a significant role in making their forest crimes profitable. Managers from

Wan Peng and Booming Green explained that they export “100%” logs, and that doing so is critical to meeting their clients’ demand. These findings paint a picture of a business model that exports the country’s raw materials with scant investment or oversight, leaving behind destruction of the forest rather than economic development.

One largely overlooked lever for addressing the governance and economic challenges presented by industrial logging in DRC is the implementation of a ban on the export of unprocessed logs. Evidence from Gabon, which implemented a log export ban in 2011, indicates that, correctly implemented, a log export ban can stimulate growth and employment. Cameroon, the Central African Republic, Equatorial Guinea, and the Republic of Congo have followed Gabon’s example in adopting or progressively implementing log export bans to boost the economic contribution of their logging sectors. DRC has joined the states of the Central African Monetary and Economic Community (CEMAC) in announcing its intention to adopt a log export ban as of 2028.

Indeed, the DRC already has a log export ban on its books from its 2002 Forest Code. However, there is a partial exception to this law which allows 30% of total production to be exported as logs during the first 10 years a concession is operated. Even under this exemption, a minimum of 70% of volume logged should be exported as processed timber. However, the government of DRC has not issued any implementing regulations since the 2002 Forest Code was enacted, and this critical law - which governs all forest concessions and logging operations throughout DRC - remains unimplemented.

As a result, DRC is at risk of becoming the last safe haven for forest looters in the Congo Basin region. Import data analyzed by EIA indicates that, for almost every year between 2002 and 2023, well over the 30% threshold - and indeed for many years analyzed well over 50% - of the country’s production was exported in the form of logs. DRC has become a significant exporter of Congo Basin logs to China and one of the largest exporters of logs in the Congo Basin relative to their overall production volume. While China’s wood imports from the other five countries in the Congo Basin consist of approximately 70% logs and 31% sawn wood over the period 2015-2023, for the DRC these figures are 97% and 3% for the same period, respectively.

In order to combat major threats to some of the last intact forest landscapes in the world, multilateral and bilateral donors contributed U.S. \$2.7 billion between 2000 and 2020, with further commitments in the pipeline. Yet these commitments seemingly do not address the fundamental economic and governance challenges associated with the country’s industrial logging sector. A status quo of regulatory free-for-all for logging companies is particularly pernicious in the context of rapidly growing log exports to China from the DRC over the last five years, and the risk that the

country’s longstanding moratorium on the awarding of new industrial logging concessions could be lifted. Enforcement of the DRC’s log export ban would help the country avoid attracting the worst kind of logging company, whose only interest is in exporting the country’s - and the region’s - natural resources as quickly as possible, while also spurring employment and growth by encouraging the industrialization of the sector.

## Recommendations:

### DRC government:

- Issue a national log export ban through implementing regulations directing the relevant organs of the civil service to enforce Paragraph 109 of the 2002 Forest Code;
- Institute policies to industrialize the country’s industrial logging sector, create jobs in the wood processing sector, and train workers to work in skilled roles in this sector; and maintain the moratorium on the allocation of new logging concessions until such time as these goals are achieved and the industrial logging sector is abiding by the country’s Forest Code;
- Cooperate with the government of the Republic of Congo and other CEMAC member states to ensure proper enforcement of their log export bans and prevent trafficking of their natural resources through DRC;
- Investigate and prosecute Wan Peng and Booming Group and their subsidiaries operating in DRC’s forestry sector, as well as public officials that have enabled them;
- Maintain the moratorium on the allocation of new concessions until the log export ban policies are implemented and have significantly improved the sector’s contribution to the national economy;

### European Union member states:

- Ensure that no wood is being imported that originates from concessions owned by Wan Peng, Booming Group, or their subsidiaries in the DRC, due to concerns over corruption and alleged illegalities associated with their operations;

### China:

- Adopt regulations to implement the amended Article 65 of the national forest code, clarifying its application to imported timber;
- Stop the import of logs exported from DRC in breach of the log export ban;

### Bilateral and multilateral organizations:

- Include the implementation of log export ban policies, in particular implementing regulations for Paragraph 109 of the 2002 Forest Code, as a precondition for all future climate- and forest-related investments in DRC.

# 1. A FOREST AT A CROSSROADS

## 1.1 DRC and the Congo Basin: Logging the Second Lungs of the Earth

The conservation of the Congo Basin rainforest - often referred to as the "second lungs of the earth" - is critical to addressing the global climate and biodiversity crises.<sup>1</sup> The forests of the Congo Basin are home to 10,000 tropical plant species and hundreds of species of mammals, birds, and fish, including many endangered species.<sup>2</sup> These forest- and peatlands collectively absorb some 1.5 billion tons of CO<sub>2</sub> every year,<sup>3</sup> equal to roughly 3.75% of global emissions in 2022.<sup>4</sup> These forestlands are also home to some 80 million people,<sup>5</sup> including Indigenous Peoples and forest communities whose livelihoods depend on the forest.<sup>6</sup> Yet these critical ecosystems are threatened by deforestation and forest degradation: one recent estimate suggests that at the current rate of deforestation, more than a quarter of undisturbed forestlands in the Congo Basin could be deforested by 2050.<sup>7</sup> One of the main drivers of deforestation and forest degradation in the region is logging, which also threatens to create more lasting impacts on forest landscapes than other, informal drivers.<sup>8</sup>

The majority of the Congo Basin rainforest is located within the Democratic Republic of the Congo (DRC).<sup>9</sup> Because of its vast areas of rainforest, the DRC is increasingly positioned as a "solution" country for the climate crisis.<sup>10</sup> However, the country's forests are not immune from the pressures that affect the rest of the Congo Basin rainforest: drivers of deforestation in DRC include agriculture, urbanization, mining, and forestry, including both artisanal and industrial logging.<sup>11</sup> When it comes to logging, two distinct but related realities coexist in DRC. The majority of logging in DRC by volume produced is artisanal logging, that is, logging that is driven by small groups of locals operating with limited resources.<sup>12</sup> Upwards of 80% of the wood that results from artisanal logging and milling is used domestically, with a small percentage exported to neighboring states such as Uganda.<sup>13</sup> Artisanal logging thus represents a significant driver of deforestation and forest degradation in DRC and across the Congo Basin.<sup>14</sup> When it comes to industrial logging, while DRC is by far the largest country by land area and forest area in the Congo Basin,<sup>15</sup> it is only the third country in the Congo Basin region - after Gabon and the Republic of Congo - for the amount of its national territory under forestry concession (Figure 2), and also exports less timber by volume and value than these countries.<sup>16</sup> Of these forests, 10% of the national forest is under concession and 22% of



Figure 1  
Congo Basin forest

	Forest area (2020) (in ha)	Area under forest concession (in ha)	Percentage of the national forest under concession	Percentage of the Congo Basin forest under concession
Cameroon	20,340,480	6,281,212	31%	13%
Central African Republic	22,303,000	3,698,531	17%	8%
Democratic Republic of Congo	126,155,240	10,762,055	9%	22%
Equatorial Guinea	2,448,420	740,122	30%	2%
Gabon	23,530,600	14,197,038	60%	29%
Republic of Congo	21,946,000	13,913,699	63%	28%
<b>TOTAL</b>		<b>49,174,876</b>		

Source: OFAC, 2018; UNFAO 2020

Figure 2  
National forest areas under concession.<sup>19,20</sup>

### BOX 1.

## MORATORIUM ON FOREST CONCESSIONS AND ILLEGALITY

The level of corruption and illegality in the industrial logging sector led the government of DRC to introduce a moratorium on new logging concessions in 2002, which has remained in place ever since.<sup>21</sup> This moratorium means that, in principle, industrial operators cannot obtain new forestry concessions. The moratorium is part of the reason that, while between 33 and 65% of the national forests of the other five Congo Basin countries are under forest concession, only 10% of DRC's forests are under concession.<sup>22</sup>

However, enforcement of the moratorium has been lax, and recent reports suggest it has slowed but not stopped the awarding of forest concessions. A report from the government of DRC found that six consecutive environmental ministers had violated the moratorium, with 18 titles illegally awarded since 2002.<sup>23</sup> A separate audit financed by the European Union and carried out by a Bulgarian consulting firm found that 54 out of 81 forestry titles in the country were illegal.<sup>24</sup> Despite these irregularities, recent reporting suggests at the time of writing that the government of DRC is considering lifting the moratorium on the awarding of new forestry concessions,<sup>25</sup> a policy change that would likely expand the presence of industrial logging concessions across the country in the coming years.<sup>26</sup>

the Congo Basin forests that are under concession are in DRC.<sup>17</sup> These forestlands under concession nonetheless span some 11 million hectares,<sup>18</sup> an area larger than Portugal.

## 1.2 Industrial Logging in DRC: A Lawless Sector

While official documentation of concession ownership in DRC is murky, most expert estimates suggest that between 4-6 operators are responsible for the vast majority of industrial logging in the country.<sup>27</sup> In recent years, Chinese operators - most notably Booming Group and Wan Peng - have obtained a number of large concessions in Mai-Ndombe, Equateur, Mongala, Tshuapa, Tshopo, and Bas-Uele provinces,<sup>28</sup> reflecting DRC's shift towards exporting significant portions of its industrial log production to China (see Section 3.2). A 2024 DRC government audit of the legality of these concessions found that Booming Green (the DRC subsidiary of Booming Group) had engaged in "fraudulent acquisition of a forest concession contract" for a concession in Mai-Ndombe province, while noting that the company had for some years failed to pay the requisite area taxes in several provinces.<sup>29</sup> The same report documented several illegalities associated with the acquisition and management of concessions belonging to Congo King Baisheng Forestry Development and Congo Sunflower Forestry Development, two Wan Peng subsidiaries operating in DRC.<sup>30</sup> These included acquisition through influence peddling; acquisition of a contract through violation of the relevant regulations; and non-payment of taxes due to the state.<sup>31</sup>

Estimates suggest that the forest sector accounts for between a meager .2%<sup>32</sup> and 1%<sup>33</sup> of DRC's GDP.<sup>34</sup> However, research from DRC<sup>35</sup> and elsewhere in the Congo Basin<sup>36</sup>

## BOX 2.

### DONORS' DARLING

In order to combat these major threats to some of the last intact forest landscapes in the world, sizable amounts of multilateral and bilateral funds have been funneled to DRC over the past 20 years. Donor contributions to climate-related development finance amounted to U.S. \$2.7 billion between 2000 and 2020, including from multilateral donors such as the World Bank, the European Union, and the African Development Bank as well as bilateral donors such as France, Germany, and the United States.<sup>40</sup> The investments in DRC's forests as a climate solution

show no sign of slowing, as donors at COP26 in 2021 pledged U.S. \$1.5 billion towards the preservation of Congo Basin forests,<sup>41</sup> while the Central African Forest Initiative committed U.S. \$500 million to DRC from 2021-2031 to prevent forest loss.<sup>42</sup> Yet these commitments have been variously called into question for not being commensurate with the scale of the challenges facing DRC's forests, as well as failing to address fundamental threats to forests in DRC such as a potential lifting of the moratorium on logging concessions.<sup>43</sup>

has shown that the distribution of forestry revenues is generally highly unequal, and disproportionately benefits local elites as opposed to forest communities.

Furthermore, the sector only directly and formally employs approximately 5,000 workers in a country of nearly 100 million people.<sup>37</sup> Revenues from surface taxes - already imposed at rates of U.S. \$0.50 per hectare - were, as of 2012, only 10% of what they should have been.<sup>38</sup> Recent reporting indicates that failure to properly collect taxes on forestry concessions resulted in the loss of more than US \$10 million in state revenues between 2014 and 2020.<sup>39</sup> As it stands, DRC's logging sector is failing to benefit either the state, forest communities, or workers in the forestry sector.

The challenges to maximizing the environmental and economic benefits of these forests are exacerbated by significant and systemic reported illegalities that have characterized the country's forest sector for years.<sup>44</sup> Despite the presence of independent monitoring (Box 3), these illegalities are in turn facilitated by a level of opacity that makes it difficult to monitor the sector and hold forest offenders accountable.<sup>45</sup> As a result, the country's forests are being in practice decimated by illegal logging,<sup>46</sup> both artisanal and industrial.

Defenders of industrial logging in DRC argue that, despite concerns over governance, the sector makes important contributions to the country's economy and the state's revenues, and that a certain level of informality has to be tolerated to support the growth of the sector. As employees of the Directorate of Forest Management explained to EIA investigators, "the state allows producers to export 100% logs, although the law does not authorize it. These [companies] are partners, they want to transform here." Yet EIA's investigation of two industrial logging giants in DRC - Wan Peng and Booming Green - paints a different picture. Their practices, and indeed their business model, indicate that the industrial logging sector more broadly is contributing little to the country's economy and development, while imperiling the DRC's status as a "solution" country for the climate crisis.



## BOX 3.

### INDEPENDENT MONITORING IN DRC

Independent forest monitoring is an approach to forest governance that seeks to ensure accountability, inclusion of civil society and forest communities, and adherence to forest laws by empowering independent third parties to monitor forest governance on the ground. In DRC, independent monitoring of forest concessions is mandated by agreement between the Ministry of Environment and Sustainable Development (MEDD) and the Observatory for Forest Governance (OGF), which acts as the Independent Monitor of Forest Law Enforcement and Governance.<sup>47</sup> There are also numerous non-mandated independent monitors active across DRC. The promise of this approach led to the development of the National Network of Independent Observers - DRC (RENOI-RDC), launched in 2021, to provide a formal platform for independent monitors across the forestry, mining, and oil and gas sectors to share knowledge, collaborate, and campaign collectively for better natural resource governance.



## 2. TWO LOGGING GIANTS, ONE BUSINESS MODEL: FOREST CRIMES

### 2.1 Two new actors enter DRC's logging sector

This report presents the findings of EIA's investigation into the industrial logging sector in DRC, and specifically two Chinese-owned logging companies, Wan Peng and Booming Green, which are two of the largest - and, due to pervasive alleged illegalities and corruption in their supply chain, most notorious - industrial logging companies currently operating in the country.

**Wan Peng** is a Chinese logging company active throughout Africa and Southeast Asia, which claims to log "as much as 200,000 cubic meters abroad each year."<sup>48</sup> The company has been accused of benefiting from an illegally traded timber license sold by a high-ranking Congolese military leader sanctioned by the European Union and US for human rights abuses.<sup>49</sup> According to Global Witness, Wan Peng "appears to have extensive logging and timber trading operations in DRC, however almost no trace of the company exists on official records for DRC's timber sector or export records seen by Global Witness."<sup>50</sup> While records about Wan Peng's official holdings are difficult to locate, a company representative told EIA investigators that the company had nine concessions (of which seven were operational) spanning more than 1.5 million hectares (while official records indicate the reality is closer to 1.7 million hectares).<sup>51</sup>

Five concessions are operated by Congo King Baisheng Forestry Development, one of Wan Peng's subsidiaries in the country, which span some 792,000 hectares. The 2002 Forest Code, however, stipulates that no entity can own more than 500,000 hectares of land, whether in one plot or across several plots.<sup>52</sup> Four concessions spanning more than 1.1 million hectares have been allocated to Congo Sunflower Forestry Development, also seemingly a violation of the Forest Code. Congo Sunflower is also alleged to have carried out violent reprisals against community members.<sup>53</sup>

**Booming Green** is a subsidiary of Hong Kong-registered Booming Group active in both DRC and Liberia. In DRC, the company operates six concessions spanning more than 1.3 million hectares,<sup>54</sup> in apparent violation of Article 92 of the 2002 Forest Code which stipulates that no entity can own more than 500,000 hectares of land.<sup>55</sup> In 2022, an investigative journalist found that Booming Green was harvesting and exporting *Afromosia* well in excess of DRC's entire CITES export quota for the species, representing a violation of DRC law as well as the trade convention.<sup>56</sup> The company has also been accused by the government of DRC of owing more than US \$2.5 million in unpaid acquisition fees and taxes.<sup>57</sup>

By their own characterization, Wan Peng and Booming Green operate on a model that takes advantage of DRC's legal framework and lax enforcement of its laws. As the



following section shows, this model in turn both relies on and facilitates corruption and illegality. Company insiders confirmed to EIA investigators that these two companies - which collectively control some 3 million hectares of forestland in the country - are engaging in an array of apparent forest crimes, and where necessary covering their steps through bribery and corruption.

## 2.2 Forest Crimes and Corruption: Business As Usual

Insiders within Wan Peng and Booming Green in DRC with whom EIA investigators spoke described an environment in which they had almost complete autonomy over their operations with no enforcement from local authorities. A source from Wan Peng explained to EIA investigators that they routinely ignored their harvesting quotas, which are meant - in theory - to help provide a basis for sustainable forest management:

**“EIA:** Will the AAC [Assiette Annuelle de Coupe] specify what tree species you can harvest? Or just the area where you can harvest?

**WP:** No, it's a logging area. The AAC specifies the logging area in the first year, including the boundaries, the range, and the tree species. There's a quota of how many trees and how many cubic meters that you can harvest.

**EIA:** Will they [the government] know how much you harvest?

**WP:** We basically don't follow the quota.”

The admission that annual quotas are flouted confirms the findings of an independent monitoring mission carried out to a concession operated by Wan Peng's subsidiary Congo King Baisheng in 2023, which noted the company carrying out “unauthorized felling” outside the area allowed by its permit and concluded that the company was “illegally logging without a cutting permit for fiscal year 2023.”<sup>58</sup> The actions described by both Wan Peng officials and DRC's independent monitor would undermine the very basis of forest governance, as timber harvest quotas are - at least in theory - designed to ensure a sustainable balance between wood production and ecosystem preservation.

An insider from Booming Green confirmed that they also deliberately circumvented their annual quotas, which in their case included restrictions on species. In response to a question from EIA investigators about their ability to harvest species that were not included in their quotas, a source from Booming Green explained that they commonly harvest species that are not listed in their quotas, and then cover their steps by bribing officials:

**“EIA:** Adding new species is not allowed there [overseas] so people just harvest the trees regardless.

**Booming Green:** We also just harvest the trees and give the tree species a new name.

**EIA:** So all these [species] are doable?

**Booming Green:** Yeah, but not if someone reports it.

**EIA:** So if you are approved to harvest one hundred thousand cubic meters and twenty species for one year, it's ok that you harvest more of the popular species?



Figure 3  
Logs at a Wan Peng mill, transported from Republic of Congo and stamped with CEMAC, for export out of DRC.

**Booming Green:** Not really. If your yearly plan is to harvest ninety or one hundred thousand cubic meters and you over harvest, you need to give them money for an additional number. I can use the same number on three different kinds of timber to export. You have to add it if you overharvest. But it's ok if you don't harvest as many as your plan.

**EIA:** Do you just need to pay the inspector, or all the people in the process including the customs?

**Booming Green:** The fewer people know, the better."

This manager explained that their ability to launder species - declare one species as another in order to circumvent their quota or restrictions on endangered species - was contingent on their ability to bribe local officials. Such practices fundamentally undermine the most basic principles of forest governance and sustainability for the benefit of a small number of exporters and clients.

The use of bribery and corruption to facilitate illegalities emerged as a common theme in EIA's conversations with logging insiders in DRC. A source from Wan Peng explained to EIA how the company had acquired a concession during the moratorium on the allocation of new forest concessions by bribing officials:

**"Wan Peng:** Now no new forest concessions are allowed for sale, but many companies own old forest concessions. You can purchase from them, just make sure you go through the Ministry of Environment for the transfer. There are certain routines that everyone here needs to go through, companies like ours also need to use money to get things done sometimes. You need to use money to get things done, that's how you do business in Africa.

**EIA:** So you need to bribe the leaders, right?

**Wan Peng:** Yeah, we have bribed the General, equivalent to the military chairman in China. [...] In this country, if you don't bribe the leaders, you can't do anything."

The source's reference to "the General" is an apparent reference to General Gabriel Amisi Kumba, who has been sanctioned by the European Union and US for human rights abuses. Global Witness in a 2019 report alleged that General Amisi had obtained five forestry licenses, and transferred them to a Wan Peng subsidiary. A source from Booming Green also told EIA investigators that Wan Peng had acquired its concessions illegally:

**"Booming Green:** Wan Peng in general is a large and strong company since they have ships.

**EIA:** It's so bad that their concession is confiscated.

**Booming Green:** I think they are going to sell the company.

**EIA:** How can they sell such a big company?

**Booming Green:** Their concession is illegally-owned, unlike us. Our boss came here and bought a French company in 2017. We have about a million and four hundred thousand hectares of forest land, so we can do this business forever if we want."

These insider explanations point to a model of illegality throughout the cycle of operations, from illegal acquisition of a concession to illegal operation of that concession, to illegal export of logs (see Section 3).

Company insiders also alluded to the use of subsidiary companies for "tax purposes." As a source from Wan Peng explained to EIA investigators:

**"EIA:** [indicating labels on timber] What's this? Is this your company name?

**Wan Peng:** It may be the one of the names our company has registered, for ease of transportation, or for tax purposes. Our products are not all labeled as the same company name."

This explanation, together with previous reporting that has indicated that the company is nearly untraceable in official records,<sup>59</sup> suggests Wan Peng used multiple corporate names and entities to make it more difficult for authorities to trace wood back to a particular company or concession of origin.

Conversations between EIA investigators and employees at Wan Peng indicated that this environment of impunity for forest crimes and enforcement is not only undermining forest governance in DRC, but also in neighboring countries. Notably, DRC's lax enforcement is allowing logs from Republic of Congo to be laundered through DRC, undermining the Republic of Congo's ban on the export of unprocessed logs:

**"Wan Peng:** This timber is just transported here from Congo Brazzaville.

**EIA:** Can you transport timber from Congo Brazzaville?

**WP:** It is transported by boat from the other side of the river. The permits overlap recently, and some documents are still pending, so the timber gets stuck here.

**EIA:** I remember that you said they can't export logs anymore in Congo Brazzaville.

**WP:** [...]They are rushing to ship the logs here [DRC]. They try to ship as much as they can."

The "rush" to ship logs out of the Republic of Congo - where a ban on the export of unprocessed logs was enacted in January, 2023<sup>60</sup> - points to the critical role that exports of unprocessed logs play for some of the Congo Basin's most notorious logging companies.

In fact, the DRC has had a log export ban on its books since January 2002, but the ban has not been implemented and includes a 10-year grace period allowing newly operating concessions to export a maximum of 30% of production in the form of logs. As the next section shows, log exports are critical to sustaining the dubious business model of Wan Peng and Booming Green - suggesting that fully implementing the country's log export ban could be an overlooked lever for transforming the DRC's forest governance.



## 3. THE LINCHPIN OF FOREST CRIME: LOG EXPORTS

In principle, the government of DRC has banned the export of logs, with the aim of making logging companies build sawmills and create jobs within the country. There is a partial and temporary exemption that allows 30% of total production to be exported as logs during the first 10 years that a concession is operated. However, trade data analyzed by EIA and insider explanations from forestry operators in DRC indicate that this theory is very different from the reality on the ground. In practice, a large majority of DRC's wood exports by volume and value take the form of logs. With other governments in the region tightening their regulations around log exports in order to create jobs and tax revenues in their forestry sectors, DRC is at risk of becoming the last safe haven for forest looters in the region.

### 3.1 Theory: No Logs Allowed for Export, With Some Exceptions

In recent years, the government of DRC has billed itself as a solution country in international climate fora. At COP26 in Glasgow, the government signed the Glasgow Leaders' Declaration on Forests and Land Use, committing it to policies "that promote sustainable development, and sustainable commodity production and consumption, that work to countries' mutual benefit, and that do not drive deforestation and land degradation."<sup>61</sup> In the runup to the 2021 climate COP, the Environment Ministry of DRC committed to banning log exports in order to slow the rate of deforestation and meet DRC's climate commitments, while also creating greater added value for the country's economy.<sup>62</sup>

In fact, the country already has a log export ban on the books: DRC's Forest Code bans the export of logs, with partial exceptions. Paragraph 109 of the Forest Code notes that the state "encourages the promotion of the

local processing industry in order to guarantee the added value of wood and other forest products," and as such provides that:

"Only the owners of operational processing units and duly authorized national operators may, for a maximum period of 10 years from the date of commencement of operations, export timber in the form of logs, subject to a quota not exceeding 30% of their total annual production."<sup>63</sup>

In this instance, both the letter and the spirit of the law are quite clear: the Forestry Code aims to encourage the development and added value of local industry, and as such provides strict limits on log exports. While operators of forestry concessions can, with the express authorization of the relevant authority, benefit from a 10-year grace period to legally export a maximum of 30% of their production in the form of logs, companies are still legally required to transform the remaining 70% or more of their production into sawn timber. Furthermore, operators of forestry concessions without such authorization are unable to legally export logs. As such, the full implementation of this law should - in theory - result at the national level in robust exports of processed timber, equivalent to at least 70% of national timber production.

Notably, however, the relevant implementing regulations that would bring Paragraph 109 of the Forest Code into force have never been put in place.<sup>64</sup> An independent expert consulted by EIA confirmed that there are no "texte d'application" ("implementing text"), for instance an arrêté (Ministerial Order) for this provision of the Forest Code. As a result, there is no regulatory framework to hold companies to account by the law - a reality that is reflected in how these companies conduct their operations.

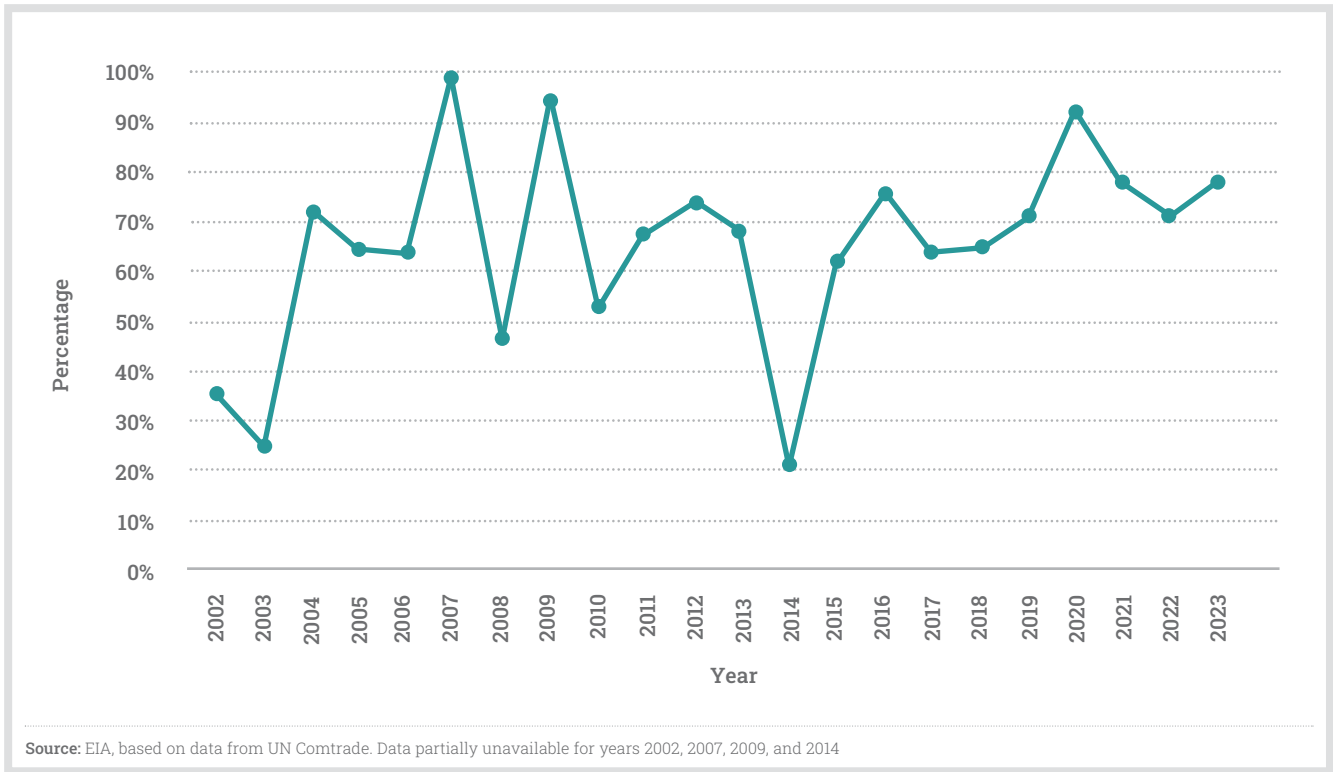


Figure 4  
Percentage of China and EU wood imports from DRC produced as logs, 2002-2023.

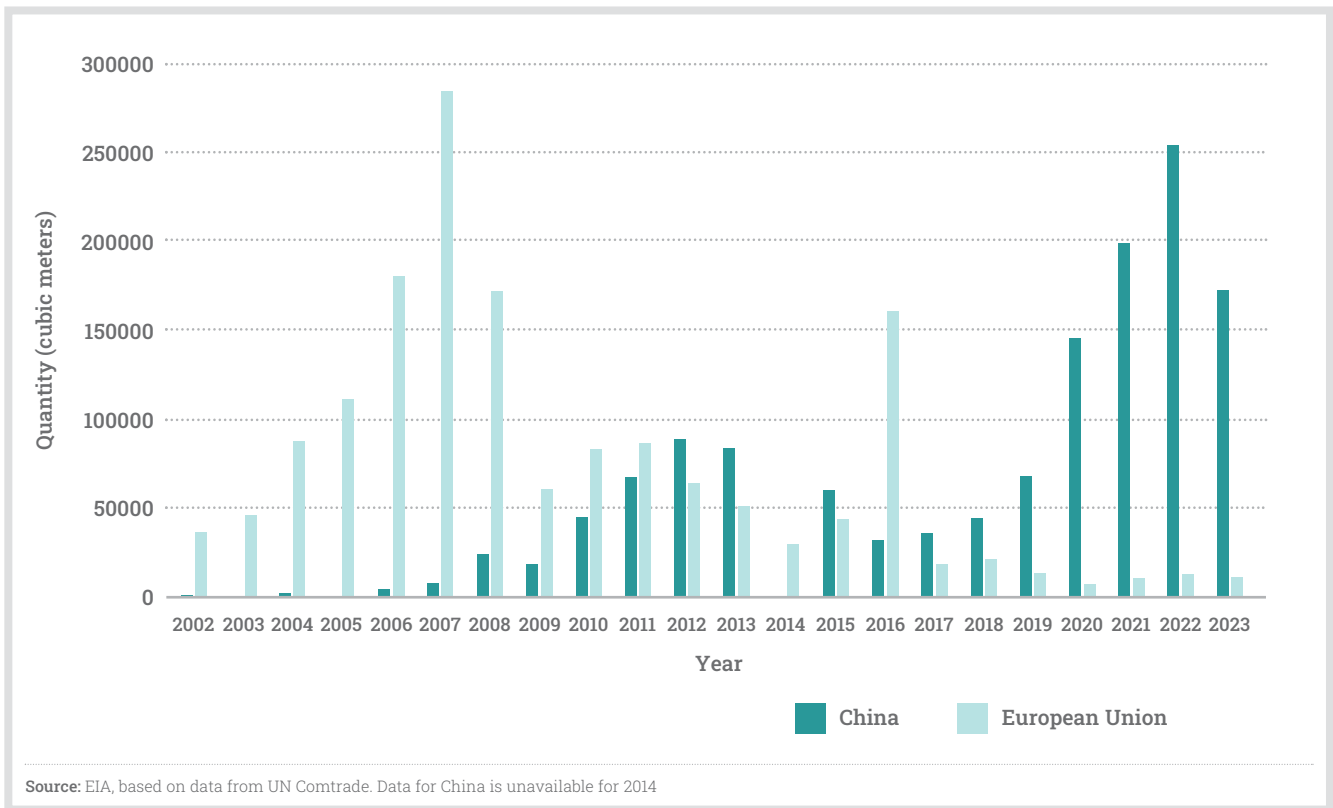


Figure 5  
China and EU imports of logs from DRC, 2002-2023.

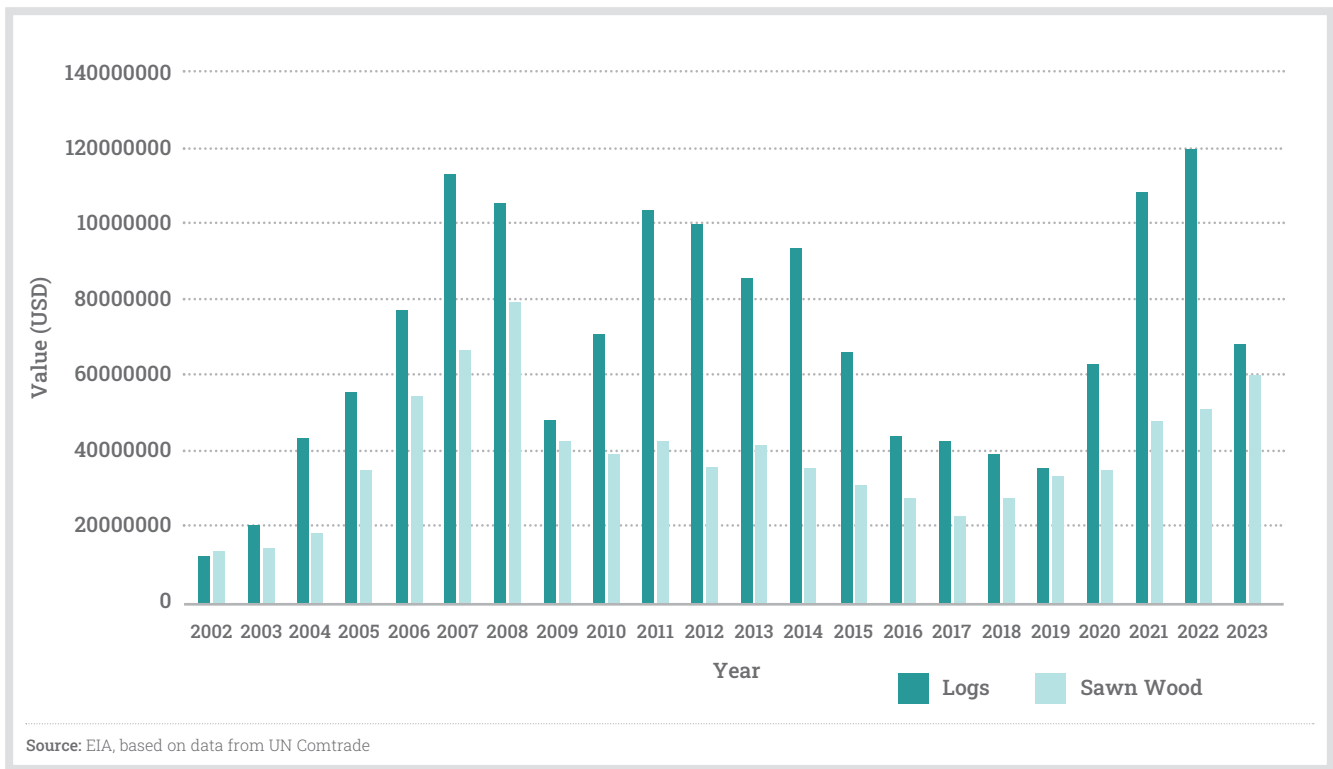


Figure 6  
Global imports of logs and sawn wood from DRC by all importers by value, 2002-2023.

### 3.2 Practice: No Processed Timber Exported With Some Exceptions

While DRC's Forest Code is designed to favor processed timber while phasing out log exports, the lack of implementing regulations has impaired its implementation. Indeed, trade data reported by importing countries indicates the opposite: log exports are favored to the near exclusion of processed timber. Data on wood imports by the EU and China from DRC suggest that over the period of 2002-2023, 66% of industrial production was exported in the form of logs.<sup>66</sup> This trend has become more pronounced in recent years: from 2015-2023, 74% of EU and Chinese wood imports from DRC were produced as logs. These figures make it plain that logging companies widely disregard DRC's legal measures on log exports.

The trajectory of the trade data indicates that the demand for logs from DRC was driven by the EU in the early 2000s, but in recent years has been driven by Chinese demand (Figure 5). While the EU imported significantly greater volumes of logs in the 2000s, this began to change in the 2010s, to a point where China's imports of logs from DRC are now roughly equal to peak imports by the EU from 2006-2008. Conversely, EU imports of logs in recent years have decreased to relatively small volumes.

While global import data by volume is not reliable enough to evaluate,<sup>66</sup> global import data by value shows

a trend towards logs as the dominant form of wood imported from DRC (Figure 6). Indeed, after a dip in the value of log imports from DRC from 2016-2018 - driven in large part by the dip in Chinese imports during those same years - the data indicate that imports of DRC logs by value rose steadily from 2020-2022. Much of this growth in log imports is driven by China, which for the years 2020-2023 accounted for 91% of global log imports from DRC by value.

### 3.3 Insiders Explain the Theory vs Reality Gap

Conversations with insiders in DRC's forestry sector - including multiple conversations with managers from both Wan Peng and Booming Green - confirm that they are operating with little regard for the log export ban or even the 30% exemption on log exports. Sources from both Wan Peng and Booming Green explained to EIA investigators that an important reason they choose to operate in DRC is the "flexibility" of the 30% maximum in DRC's log export ban, in contrast to total bans on log exports in Gabon and the Republic of Congo. Indeed, sources from Wan Peng and Booming Green both confirmed, in separate conversations with EIA investigators, that they were able to export only logs:

"EIA: What portion of logs can you export?  
Wan Peng: One hundred percent."



Source: EIA



Source: EIA

Figure 7  
Machinery at a Booming Green mill in DRC.

"EIA: Can you export 100 percent logs from this country now?"

**Booming Green:** Yeah, we can."

Insiders also explained to EIA investigators that the persistence of log exports is due in large part to the fact that the business model for Chinese firms operating in DRC appears to be largely dependent on selling logs rather than processed wood. As a source from Wan Peng explained to EIA investigators:

"EIA: What percentage of your shipments are logs now?"

**Wan Peng:** I haven't counted it, but our boss prefers to sell logs. Logs are easy to sell because our clients [in China] can take them back and decide how they want to process, while planks are not like that."

While in theory DRC's forest code should be leading logging companies to phase out log exports, in practice these companies appear to be exporting logs whenever it is economically convenient for them to do so - which is almost always.

Insider sources also confirmed their clients' preference for logs, and noted that DRC has become a favored source for firms looking to substitute for the declining supply of logs coming from other countries. A source from Wan Peng explained to EIA investigators that the enactment and enforcement of log export bans in other countries in the Congo Basin has made DRC more attractive, due to its permissive environment for logging companies:

"**Wan Peng:** The export of logs from Congo Brazzaville will be banned soon, as one of the six Central African



Source: EIA

Figure 8  
Logs being shipped out of a Wan Peng mill in DRC.

countries. The export of logs from Gabon is totally banned. The export from Cameroon has a combination of logs and boards, and there's a quota. But that kind of thing is not heard of here."

This explanation from a forestry insider speaks to a log export ban that exists only on paper - and that two of the largest industrial loggers in DRC systematically ignore.

While these companies - by their own account - choose to mostly export logs, EIA investigators also visited sawmills operated by both Booming Green and Wan Peng in DRC. Sophisticated technology for processing plywood and veneer exists at these sites (Figure 12). However, a Booming Green manager explained that they process very little timber to export themselves, and instead lease their sawmills out to clients:

"EIA: So the majority of your sawn timber is sold to Europe?"

**Booming Green:** No. For sawn timber, our buyers come and stay here to choose whichever timber they want. And they harvest the trees all by themselves. None of our people are involved in the production and management. At the end they pay us according to the quantity.

EIA: So they buy logs from you?

**Booming Green:** The equipment is ours. [...] The raw material is ours, the clients buy the timber according to their production standards, and we ship it to them and charge by the unit.

EIA: So all your exports are logs?

**Booming Green:** Yeah, on our side."

Investigators also noted large stockpiles of logs, including logs being loaded onto trucks for overland shipping, and near the company's equipment on the river which would be used to ship logs (Figure 8, Figure 9). EIA investigators' trips to processing mills in Gabon, DRC, and China over the last several years indicate that the facilities operated in DRC are likely not significantly less efficient in terms of processing ratio than processing mills in China, but rather that companies are not choosing - or being required - to use sawmills in DRC for processing most of their timber.

Furthermore, EIA's investigation indicated that managers for these companies were aware of the existence of the ban, but are opting to disregard it. A manager for Wan Peng explained to EIA investigators that the 30% quota for log exports was "not enough" to meet their clients' demand for logs. Another manager from Wan Peng confirmed the use of bribery to circumvent the country's log export ban:

"EIA: There's a rule that you can't ship 100% logs. So the rule just doesn't matter?"

**Wan Peng:** Money always works in this country. There is a limitation in Congo Brazzaville that your shipments can't contain more than 45% of logs, but you can still ship as many as you want after bribing with money. Money always works in Africa. Someone beat people to death in the day but can go home at night. With money, law has no bottom line.

EIA: Although it sounds complicated, it's simple sometimes.

**Wan Peng:** The so-called law here doesn't matter, money can fix everything."

A source from Booming Green explained in detail their perception of the policy context of the log export ban and lack of implementing regulations, and explained the importance of the so-called "flexibility" of the 30% quota in allowing them to export logs:

**Booming Green:** The government keeps changing. However, the law that logs can't be exported is not decided by a minister or even the president. The law is decided by the National Assembly, which means that the proposal has to be submitted and get approved there. Who would do that to offend the timber companies? Also, to pass the bill, all the people in the Congress have to be paid, imagine how much money that would be. So the logs can always be exported here.

EIA: You can only export 30% logs according to the law, right?"

**Booming Green:** That's why the export is totally banned in Congo Brazzaville and Gabon. We can operate as long as there's such flexibility."

The trade data and insider perspectives presented in this section confirm that the ability to export logs is fundamental to the business model of DRC's most notorious timber barons, and often goes hand-in-hand with illegal logging practices, tax avoidance, and bribery. The business model of raw log exports to China



Source: EIA



Source: EIA

Figure 9  
Logs being shipped out of a Wan Peng mill in DRC.

allows industrial logging companies to export the country's raw materials for processing elsewhere while investing almost nothing in terms of employment, infrastructure, or the wellbeing of forest communities affected by forestry operations. As the next section shows, this is a dynamic that has affected the entire Congo Basin and indeed many countries across Africa -

and one to which African governments are increasingly responding with log export bans. In this context, a largely overlooked lever for transformative change of the sector resides in the enforcement and strengthening of the DRC's log export ban - aligning the DRC's forestry policy with that of most of its neighbors and indeed much of the African continent.



# 4. THE POLICY POTENTIAL OF A LOG EXPORT BAN

## 4.1 African Log Export Ban 101

The rise of African log export bans over the last two decades can be understood in the context of the global timber trade, in particular the dependence of China's timber processing industry on the mass import of tropical logs, making the country the largest - by far - importer of tropical logs in the world.<sup>67</sup> Since China's implementation of its Natural Forest Protection Program in 1998, its domestic timber production from natural forests has decreased dramatically, and the country has increasingly shifted its sourcing of tropical wood from domestic forests to overseas.<sup>68</sup> Raw material from plantations in China cannot meet the specific needs of the massive timber-based industries, in particular the furniture and plywood sectors; therefore the Chinese processing sector relies on large-scale log imports. As a result, Africa has grown as a major sourcing continent for tropical logs processed in China, drawing Southeast Asia and the Americas and now rivaling Oceania (Figure 10).<sup>69</sup>

A growing number of African countries have prohibited the export of logs, in an attempt to break a pattern reminiscent of the European colonization of Africa whereby African countries provide raw materials for processing in another continent. Of 52 countries' legal frameworks analyzed in Africa,<sup>71</sup> EIA analysis indicates that 15 have implemented full log export bans. A further 15 countries have implemented partial log export bans or are progressively implementing full bans (see Figure 11). Countries with total log export bans account for 44% of African forests, while countries with partial log export bans account for a further 40% - meaning that 84% of the continent's forests are covered by either a total or partial log export ban.<sup>72</sup>

Proponents of log export bans advance two key arguments. First, they argue that such bans help local, provincial, and national authorities economies by stimulating investment in local processing and encourage the export of "value-added" products rather than raw logs.<sup>73</sup> These advocates point to the significantly greater added value of exporting processed wood - which the African Development Bank estimates

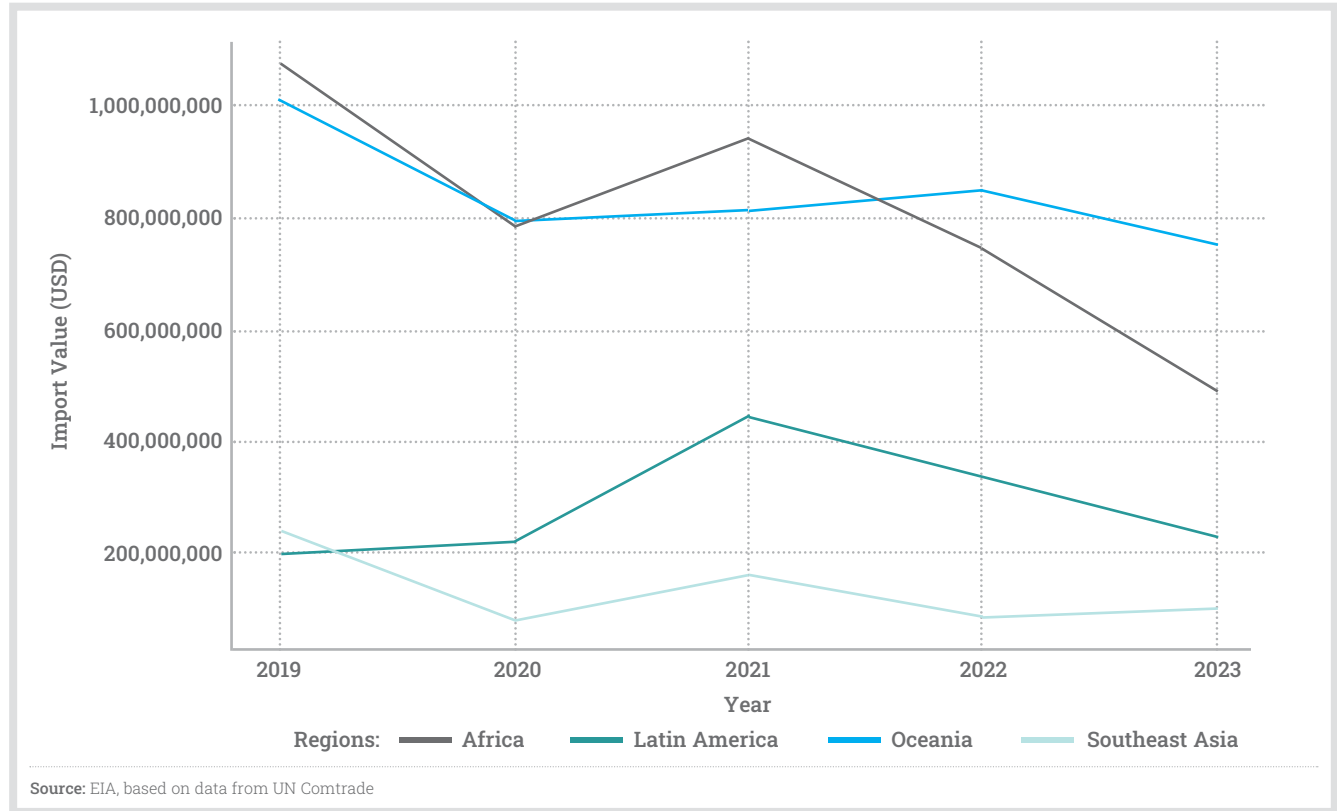


Figure 10  
China's Imports of Tropical Logs by Region by Volume, 2019-2023.



Figure 11  
Map of log export bans in Africa.<sup>70</sup>

#### BOX 4.

### INDONESIA'S LOG EXPORT BAN: GROWTH OF FINISHED EXPORTS

One of the first log export bans to be implemented was in Indonesia, which in the 1980s was grappling with some of the highest levels of deforestation in the world. The government of Indonesia phased in a log export ban from 1981-1985, after which point log exports from the country were fully banned.<sup>82</sup> (The ban was lifted in the 1990s,<sup>83</sup> only to be reinstated in 2001.<sup>84</sup>) The policy was remarkably effective at catalyzing the development of the wood processing industry in the country: as of 1996, processed forest products had become the country's second-greatest foreign exchange earner behind hydrocarbons, accounting for some US \$3 billion annually in revenues and leading to the direct employment of some 3.7 million people.<sup>85</sup> As the country emerged from the Suharto era, the log export ban became a cornerstone of the country's forest governance - and one that has survived a number of domestic and international challenges.<sup>86</sup>

would generate 3-10 times greater economic margins and 4-12 times more employment relative to primary products.<sup>74</sup> Research from Indonesia and Gabon has shown that, correctly implemented, log export bans can be a significant boon to GDP and employment at the national level (see Box 4 and Section 4.2).

Second, proponents argue that log export bans give governments greater oversight over timber exports and make illegal logging less lucrative. Indeed, research by EIA and others has shown that the market for illegal timber is heavily contingent on a supply of unprocessed or minimally processed logs to manufacturing hubs (see Section 3.3 of this report). Vietnamese timber traders in Cameroon explained to EIA investigators that the enforcement of a full log export ban would completely disrupt the supply chain for illegally sourced wood,<sup>75</sup> while EIA reports on illegalities on the industrial logging sectors in Equatorial Guinea and the Republic of Congo have demonstrated that log exports play a key role in facilitating forest crimes in those countries.<sup>76</sup> Addressing governance issues in the forestry sector is critically important to tropical forest countries' economies and environments, given that 50-90% of tropical wood is illegally logged.<sup>77</sup> These issues are particularly pronounced in the Congo Basin, where previous EIA reports have documented significant legality concerns in the forestry sector in Cameroon,<sup>78</sup> Equatorial Guinea,<sup>79</sup> Gabon,<sup>80</sup> and the Republic of Congo.<sup>81</sup>

## 4.2 State of Play of Log Export Bans in the Congo Basin

Gabon became one of the first countries in the region to implement a log export ban in 2011.<sup>87</sup> According to available information, the log export ban has created significant value for the country in economic terms, having quadrupled the forestry sector's contribution to national GDP while tripling the value of exports.<sup>88</sup> Industry data indicates that from 2010 to 2022 the forestry sector's contribution to GDP increased from 54 billion XAF to 168 billion XAF (U.S. \$88 million to U.S. \$274 million), while the wood processing industry's contribution over the same period increased from 62 billion XAF to 322 billion XAF (U.S. \$101 million to U.S. \$525 million).<sup>89</sup> The policy is reportedly responsible for the generation of some 17,000 jobs across the forestry and processing sectors,<sup>90</sup> a substantial increase in a country of just over 2.3 million people where unemployment hovers around 20%.<sup>91</sup> At the same time, the export ban appears to have led to a *lower* rate of deforestation when compared with both Gabon's pre-export-ban trajectory, and comparable countries in the Congo Basin. By one estimate, the ban has led to 2100 square kilometers of avoided deforestation.<sup>92</sup>

The log export ban has not been a silver bullet for forestry governance. EIA's 2019 report *Toxic Trade* documented systemic corruption and irregularities in Gabon's forestry sector.<sup>93</sup> Indeed, neither the Republic of Congo<sup>94</sup> nor Gabon<sup>95</sup> has a mandated independent forest

monitor, which presents an elevated risk of illegality and makes it more difficult to obtain up-to-date information on forestry companies' level of compliance with relevant legislation. Evidence from recent years further suggests that, absent traceability and transparency for exported timber, illegal trade will remain a threat to forestry governance in Gabon.<sup>96</sup> However, trade data suggests that the export of logs in violation of national laws represents an increasingly negligible portion of the timber sector in the country: roundwood trade from 2015-2019 never exceeded 1.5% of 2009 levels from 2015-2019 (Figure 12). The trajectory of Gabon's timber sector since 2011 suggests that the log export ban is a crucial tool for policymakers in the Congo Basin looking to balance economic growth and job creation with the conservation of critical forest landscapes, while supporting initiatives that would strengthen the country's forest governance such as a national-level transparency and traceability system (Box 5).

In recent years, Gabon's experience has generated regional momentum for log export bans, most notably at the regional level through the Economic and Monetary Community of Central Africa (CEMAC). To date, the Republic of Congo has joined Gabon in implementing a full export ban as of 2023, while Central African Republic and Cameroon have opted instead for progressive implementation of a full ban, scheduled to come into effect in 2025 and 2026, respectively.<sup>97</sup> Equatorial Guinea

BOX 5.

## TOWARDS TRANSPARENT LOGGING AND ASSOCIATED TRADE IN GABON

Following EIA's 2019 *Toxic Trade* report, EIA and the tech nonprofit Code4Nature (C4N) have collaborated with Gabon's Ministry of Water and Forests to build and implement a national timber traceability system, the Systeme Nationale de Traçabilité du Bois du Gabon (SNTBG). This system is a digitization of Gabon's forest sector, with a smartphone mobile application replacing paper permits for each transaction from the inventory of standing trees, through to export of finished products. Ministry and company officials can access data via an online geoportal. When fully implemented, the geoportal should provide transparent access to key supply chain data to civil society monitors and forest communities. International timber buyers will be able to independently conduct due diligence and obtain verifiable origin information as required under the EUDR.

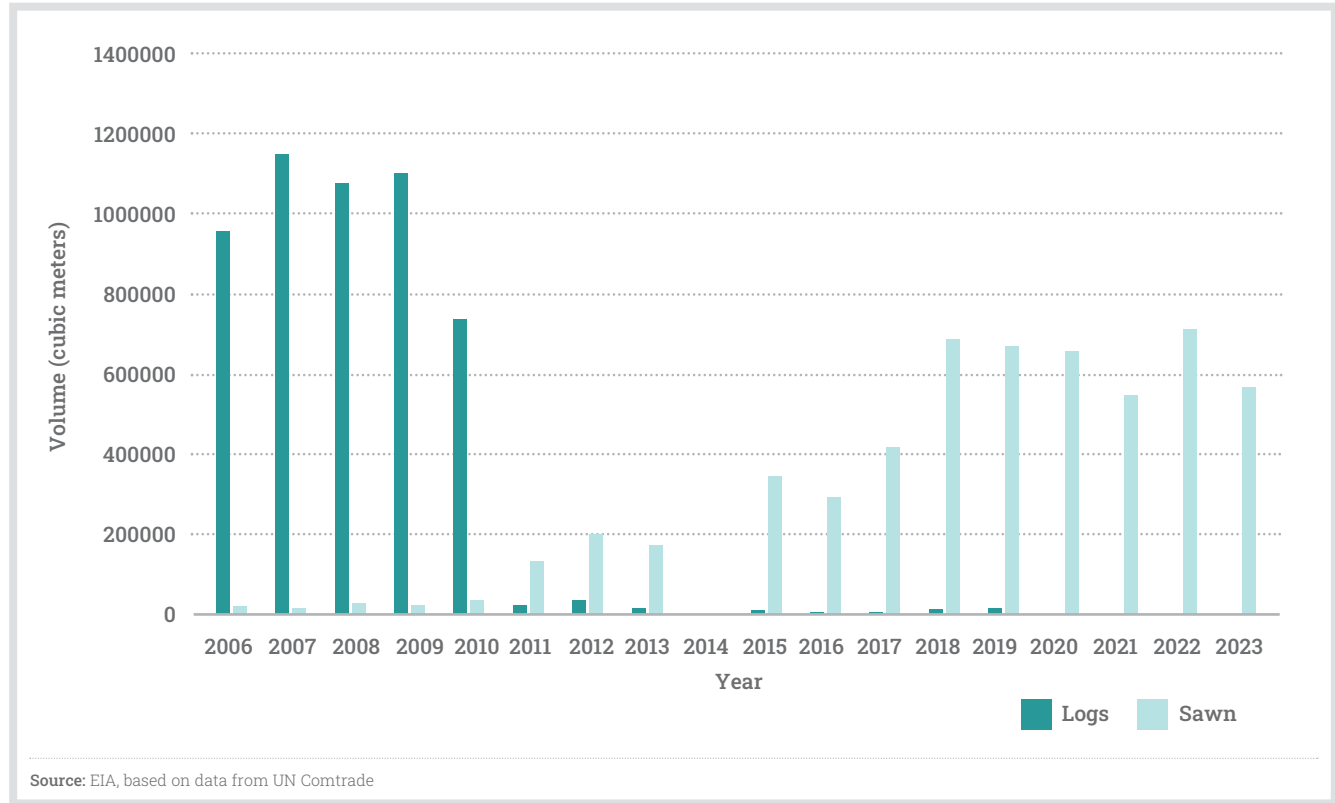


Figure 12  
China's imports of roundwood and processed wood from Gabon, 2009-2020.

had also indicated it would reinstate a full ban as of July, 2024, though the status of this ban was unclear at the time of publication.<sup>98</sup>

In February, 2024, CEMAC released a decision that DRC would join its six member states in implementing such a measure as of 2028. The decision further calls for states to begin progressive implementation of such a ban in 2025.<sup>99</sup> This regional approach would ensure that DRC does not become a safe haven for forest looters - or a site of timber laundering that would undermine the efficacy of its neighbors' policy.

### 4.3 DRC: The Congo Basin's Safe Haven for Forest Looters and Log Smugglers?

The CEMAC announcement in February, 2024 that DRC will join CEMAC countries in implementing a log export ban by 2028 represents a significant positive step towards improving forest governance in the region. However, DRC still lags behind its neighbors in implementing such a ban. This trend risks making DRC not only a safe haven for forest looters, but a site of timber laundering that would undermine regional efforts to crack down on the trade in unprocessed logs.

DRC's status as an outlier in the region is borne out by trade data. Furthermore, data shows that log export bans

do not appear to have harmed the timber trade in Gabon and the Republic of Congo, which both outstrip DRC in terms of exports.<sup>100</sup> Other countries in the Congo basin have, after a peak in exports from 2015-2018, exported progressively smaller volumes of logs to China (Figure 14). These countries have also, in contrast to DRC, exported significantly greater volumes of processed wood.<sup>101</sup> Conversely, while other countries in the region have clamped down on log exports, in DRC they are booming. Trade data shows that logs exports from DRC to China exploded from around 70,000 m<sup>3</sup> in 2019 to over 250,000 m<sup>3</sup> in 2022.<sup>102</sup> Given that the number of logging concessions did not greatly expand in DRC during that time period, one explanation for this increase could be that – as our investigators were told by insiders from Chinese logging giants – DRC is being used to launder logs from neighboring countries.

Data also shows that the tendency to export raw unprocessed logs means that DRC is getting left behind other countries in the region in terms of its tax revenues from the logging industry, and in the number of jobs created by the sector. A report commissioned in 2014 by the Agence Française de Développement (AFD) estimated the number of jobs created by the timber industry in DRC at just over 5000.<sup>103</sup> This compares unfavorably with an estimated 7,000 jobs created in Republic of Congo<sup>104</sup> and 17,000 in Gabon,<sup>105</sup> two neighboring countries with far smaller populations and less forestland than DRC. The same AFD report stated that in DRC the industry

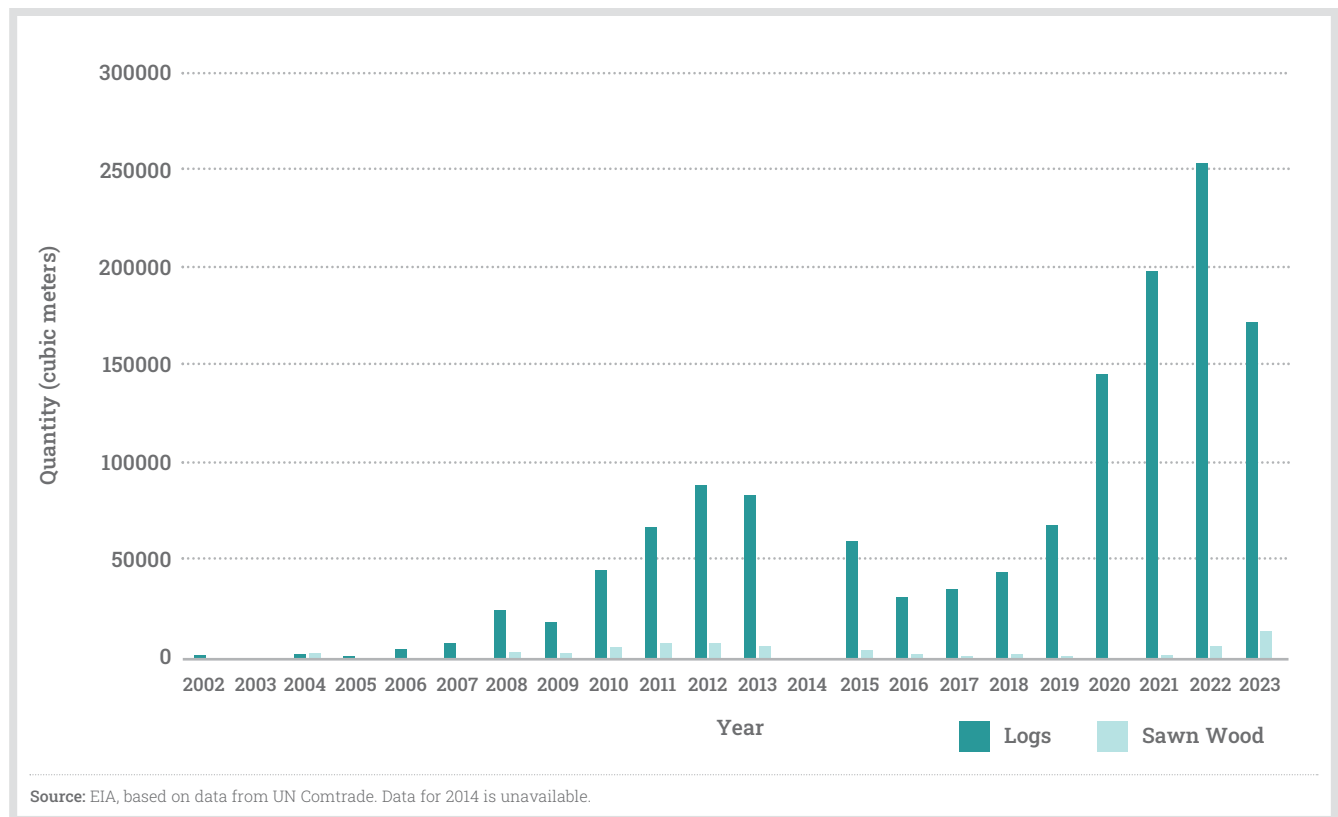


Figure 13  
Chinese imports of logs and sawn wood from DRC by volume, 2002-2022.

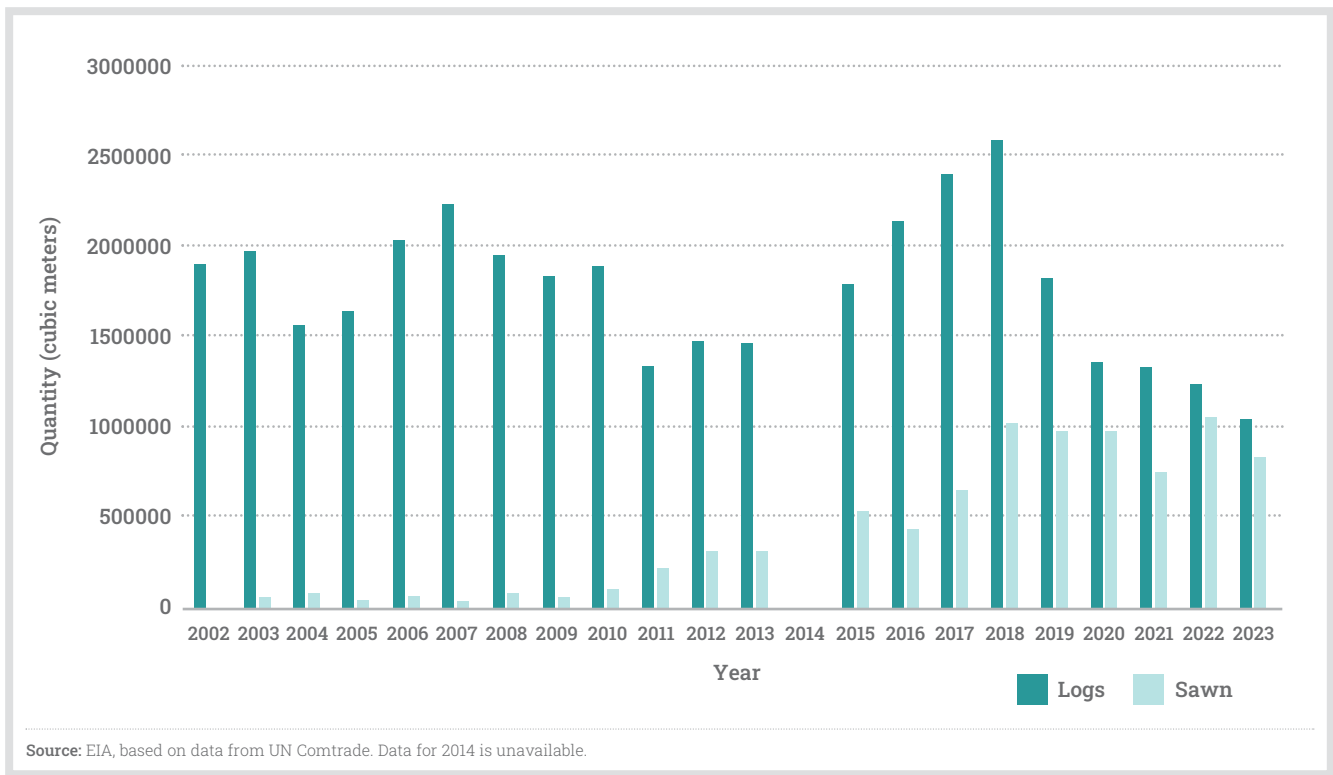


Figure 14  
Chinese imports of logs and sawn wood from other Congo Basin countries by volume, 2002-2022.<sup>108</sup>

contributed a paltry US\$2.5 million per year in taxes on average between 2018 and 2022, despite the country having some 11 million hectares of forest under logging concessions.<sup>106</sup> By contrast, Gabon’s tax take from forestry could be in the region of US \$200 million.<sup>107</sup> DRC’s tendency to attract unscrupulous companies who are permitted to export huge quantities of unprocessed logs rather than building up local sawmill operations could be seen as one reason why DRC’s tax revenues from forestry are languishing.

Thus, while increases in volume of log exports from DRC have not yet kept pace with decreasing exports from other Congo Basin countries, the enormous growth in China’s imports of logs from DRC in recent years suggests that logs from DRC - and, according to EIA’s investigation, logs from the Republic of Congo laundered through DRC via the Congo river - are being used to make up the shortfall in Congo Basin exports of logs.

The possibility of DRC joining CEMAC countries in implementing a blanket regional log export ban raises the possibility that the export of Congo Basin logs could become a thing of the past - forcing business models to adapt and giving governments a tool to crack down on forest looters. EIA’s conversations with forestry operators in DRC more generally underscore the prospect of implementing a log export ban and the need to crack down on violators, who would otherwise undermine the letter and spirit of such a ban.

**“The so-called law here doesn't matter, money can fix everything.”**

## CONCLUSION AND RECOMMENDATIONS

**Previous research and investigations have indicated that the industrial logging sector in DRC is contributing little to the country's economy or wellbeing of forest communities, while actively undermining sustainable forest management and DRC's efforts to position itself as a solution country for the climate crisis.**

EIA's investigation provides further evidence that two of the largest industrial loggers in the country are also two of its worst actors. The findings presented here strongly suggest that Wan Peng and Booming Green are engaging in forest crimes and corruption to sustain a model that allows them to export the country's resources for as little return as possible - and that this model is contingent on the wholesale export of unprocessed logs.

While not a silver bullet, evidence from across the region, as well as insider perspectives from the industrial logging sector, suggests that a log export ban could be a significantly positive step in terms of disrupting the business model of the worst actors while encouraging greater investment in the sector and better forest management. The example of Gabon demonstrates that, when correctly enforced and implemented, a log export ban can have significant positive effects on the industrialization and environmental impact of a country's forestry sector. Following this lead, the other CEMAC countries are set to implement log export bans of their own in the coming years. If the DRC is to avoid becoming the last safe haven for forest looters in the region, the government must take urgent action to address the governance of the sector - including by implementing a log export ban.

### Recommendations

#### DRC government:

- Issue a national log export ban through implementing regulations directing the relevant organs of the civil service to enforce Paragraph 109 of the 2002 Forest Code;
- Institute policies to industrialize the country's industrial logging sector, create jobs in the wood processing sector, and train workers to work in skilled roles in this sector; and maintain the moratorium on the allocation of new logging concessions until such time as these goals are achieved and the industrial logging sector is abiding by the country's Forest Code;
- Cooperate with the government of the Republic of Congo and other CEMAC member states to ensure proper enforcement of their log export bans and prevent trafficking of their natural resources through DRC;
- Investigate and prosecute Wan Peng and Booming Group and their subsidiaries operating in DRC's forestry sector, as well as public officials that have enabled them;
- Maintain the moratorium on the allocation of new concessions until the log export ban policies are implemented and have significantly improved the sector's contribution to the national economy;

#### European Union member states:

- Ensure that no wood is being imported that originates from concessions owned by Wan Peng, Booming Group, or their subsidiaries in the DRC, due to concerns over corruption and alleged illegalities associated with their operations;

#### China:

- Adopt regulations to implement the amended Article 65 of the national forest code, clarifying its application to imported timber;
- Investigate Chinese citizens involved in timber trafficking in Mozambique and enforce Article 164 of the National Criminal Law that criminalizes bribes given to non-Chinese public officials.

#### Bilateral and multilateral organizations:

- Include the implementation of log export ban policies, in particular implementing regulations for Paragraph 109 of the 2002 Forest Code, as a precondition for all future climate- and forest-related investments in DRC.



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