



# BOOTLEGGERS, BROKERS AND BUYERS

Rampant illegal logging on Indigenous land in Brazil's Amazon and the continued flow of tainted timber to EU and U.S. markets

January 2026





Source: Coletivo Áudio Visual Wakoborũn

A patrol of Munduruku Indigenous people hang signs to demarcate their territory.

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## ACKNOWLEDGMENT

This document has been produced with financial assistance from Norway's International Climate and Forest Initiative (NICFI), The Tilia Fund, Cox Foundation and Roaring Brooks foundation. 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.

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Front cover: Satellite imagery (© 2024 CNES) showing illegal logging sites in Munduruku Indigenous Territory; markers added by EIA.

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Unless otherwise stated, the sources for this report include EIA's internal investigative notes, photographs, audio and video recordings collected during the investigation, as well as publicly available data and satellite imagery.

# EXECUTIVE SUMMARY

As the 30th UN climate summit (“Conference of the Parties,” COP30) has concluded in Pará – Brazil’s top timber-producing state and an illegal logging hotspot – a new Environmental Investigation Agency (EIA) report reveals ongoing timber crime in the Brazilian Amazon and the continued flow of tainted wood products into European and U.S. markets. EIA’s April 2025 *Tricks, Traders and Trees* report exposed how 53,000 m<sup>3</sup> of lumber in Pará – enough for 1,828 shipping containers – was claimed to come from five licensed harvest sites where satellite imagery revealed no logging, or insufficient harvest levels, or other illegal activities. Timber from those operations then entered the supply chains of 19 sawmills, 16 exporters – many fined by Brazil’s environmental agency IBAMA – and 30 EU and U.S. importers. Acting on evidence from EIA’s previous report, Dutch authorities confirmed a breach of the EU Timber Regulation (EUTR), which obliges companies to keep illegal wood off the EU market, leading to enforcement action against the importer. EIA’s follow-up investigation now uncovers further evidence of extensive illegal logging in an Indigenous Territory, more tainted timber and laundering feeding EU and U.S. markets – involving three logging sites and some of the same exporters and importers. Taken together, the findings indicate widespread non-compliance with the EUTR and the Lacey Act, the latter of which prohibits imports of illegal timber into the U.S. The investigation also highlights why the more stringent due diligence

requirements of the EU Deforestation Regulation (EUDR), which will replace the EUTR, are urgently needed to stop the flow of illegal Amazon timber into the EU market.

Following EIA’s earlier investigation, the Pará State Prosecutor’s Office (MPPA) convened a workshop with the state environmental secretariat (SEMAS), the federal environmental agency (IBAMA), federal prosecutors, experts, and civil society – including EIA – to discuss solutions. The outcome confirmed Pará’s timber-tracking system (SISFLORA 2.0) still allows falsified inventories and self-declared data to mask large-scale illegality and laundering, undermining compliance with the EUDR and U.S. Lacey Act. The Prosecutor [recommended](#) creating a real-time digital traceability system integrated with IBAMA’s federal platform – combining GPS tracking, geolocated verification, satellite monitoring, and open-data transparency – with SEMAS responsible for implementation. This new investigation shows why those reforms cannot wait: the Amazon’s forests and Indigenous peoples are paying the price while illegal timber continues to feed EU and U.S. markets. Turning the Prosecutor’s recommendations into national policy would send a powerful signal that Brazil is serious about ending timber crime at its roots. It would also challenge the EU and the U.S. to match that commitment by fully implementing and enforcing the EUDR and Lacey Act, to ensure their timber imports do not drive crime and environmental destruction in the Amazon.

## Key findings include:

- EIA uncovered a massive illegal logging operation in the Munduruku Indigenous Territory in Pará, with roughly 5,000 hectares of pristine forest (or 7,000 soccer fields) accessed by 60 km of roads and high-resolution satellite imagery showing an estimated 1,200 m<sup>3</sup> of logs piled along them.
- The investigation reveals how this kind of timber is ‘legalised,’ documenting three licensed logging sites in Pará with evidence of laundering or illegal harvesting of over 25,000 m<sup>3</sup> of lumber - about 830 shipping containers. Combined with findings from EIA’s previous report, the total volume of tainted timber identified exceeds 78,000 m<sup>3</sup>, or 31 Olympic pools of logs.
- Eleven sawmills, 10 of which had been fined by enforcement agencies in other cases, received timber from two of those operations and supplied some of it to eight exporters, many of them also fined in other instances and exposed in EIA’s previous report. Together, these links show a pattern of trading products with a high risk of illegality.
- The exporters then sold Ipê and Cumaru decking products claimed to be from those operations to 11 importers in the U.S., Portugal, France and Germany - several also exposed in EIA’s earlier investigation - with strong evidence suggesting breaches of the EUTR and Lacey Act bans on imports of illegal timber, as well as both laws’ requirements for importers to verify legal origin.
- One U.S. importer was found to have supplied products made from the same species to luxury clients including Marriott, Hyatt, and Formula One VIP stands.
- Links were also found between major EU importers of Ipê and Cumaru – both protected by the Convention on International Trade in Endangered Species of Flora and Fauna (CITES) – and decking and flooring companies that trade the same species for projects in popular tourist spots in Italy, Austria and France.
- In one instance, EU public funds have supported a timber company that later imported wood products from the illegal logging operations identified in this report.
- Finally, the investigation underscores the urgency of fully implementing the EUDR, showing why the law’s more rigorous due diligence requirements and enforcement regime are necessary to prevent illegal timber, such as that identified by EIA’s investigations, from entering the EU market.



Source: Marizilda Cruppe / Greenpeace

# INTRODUCTION

Illegal logging wreaks havoc on forests, violates the rights of Indigenous peoples, devastates ecosystems, and fuels organized crime, all while eroding the rule of law. Brazil, the world’s fourth-largest supplier of tropical wood, exports vast amounts of Amazon timber, primarily to the U.S. and EU.<sup>2</sup> Yet, alarmingly, 35% of the timber harvested from the Amazon is thought to be illegal – likely an understatement.<sup>3</sup> In the state of Pará, the extent of illegal logging is conservatively estimated to cover almost half of the total area subject to logging<sup>4</sup> and is often followed by land-grabbing and deforestation for cattle and agriculture.<sup>5</sup> EIA’s new investigation shows

that among the areas impacted by illegal logging are Indigenous territories, while the sawmills and traders whose demand drives this timber bootlegging move their products into domestic, EU, and U.S. markets under a veneer of legality. American and European importers frequently do light-touch due diligence, feeding a global appetite for luxury decking in hotels and resorts, backyard decks and city boardwalks – leaving unwitting consumers complicit in the Amazon’s undoing. It all starts with illegal logging, and in the next section, we illustrate its impact on the Munduruku Indigenous Territory in Pará.

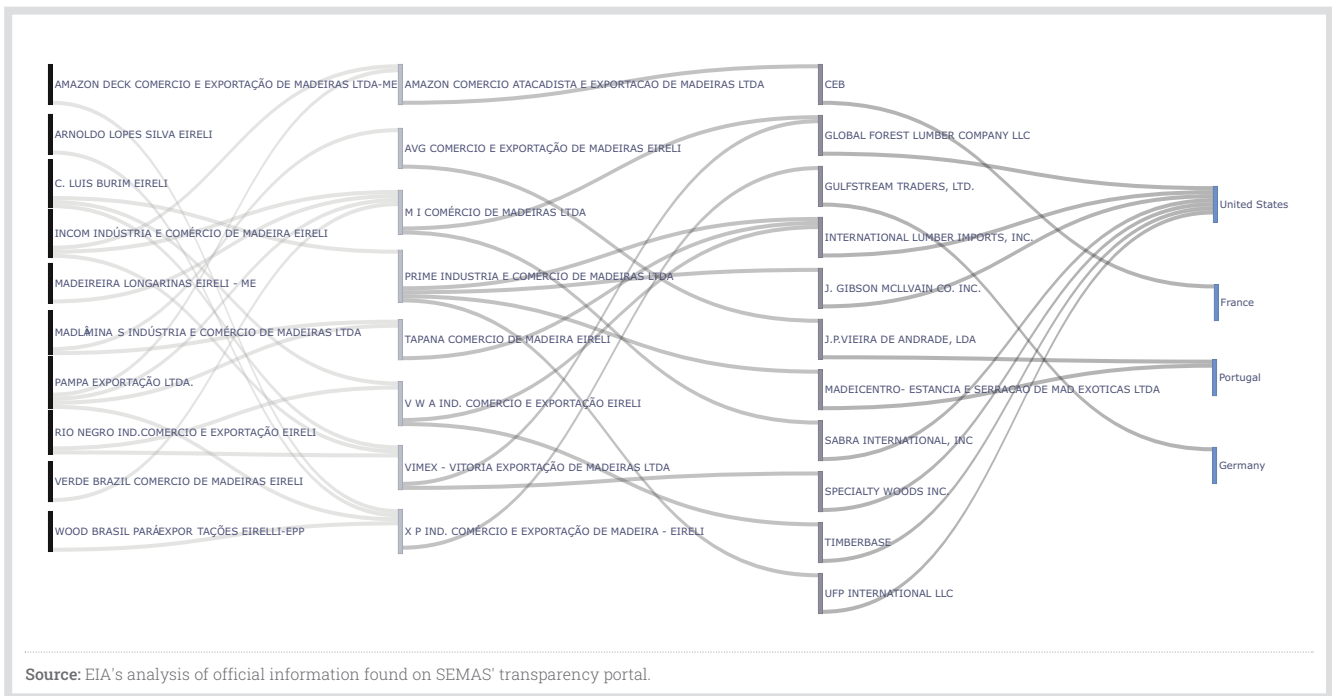


Figure 1  
Supply chains revealed in this report, showing timber flows from logging sites Fazenda Odila and Fazenda Pinheiros 2 in Pará, Brazil, through to sawmills, exporters and importers in the U.S., Portugal, Germany and France between 2022 and 2025.<sup>1</sup>



Photo: EIA

Munduruku Indigenous people discuss strategies for monitoring their territories against illegal invasions.

## CASE STUDY 1: Illegal Logging in Munduruku Indigenous Territory

EIA investigations and other recent analyses<sup>6</sup> show that large volumes of timber from Pará do not originate from the areas claimed in logging permits. Identifying the true extraction sites is challenging without real-time field data. A 2024 study from civil society initiative Sistema de Monitoramento da Exploração Madeireira (SIMEX), using low-resolution satellite imagery and a conservative methodology, found that 35% of logging detected in the Brazilian Amazon between August 2022 and July 2023 occurred without authorization; 16% or about 20,000 hectares (ha) of this was in Indigenous Territories (Territórios Indígenas, or TIs).<sup>7</sup> A more recent SIMEX analysis for Pará places unauthorized logging even higher – at 47% of the total logged area between August 2023 and July 2024.<sup>8</sup>

EIA and its Munduruku partner organization, the Wakoborün Women’s Association, recently uncovered a massive, previously unreported illegal logging operation in the Munduruku TI that took place in 2023 and 2024. The Munduruku people, numbering approximately 16,000, have lived for centuries along the Tapajós River and its tributaries in what is now Pará and Mato Grosso. For decades they have struggled for official recognition of their traditional lands. In 2004, the legal process for recognizing the Munduruku TI, covering approximately 2.4 million ha – one of the largest in the Amazon – was completed. Seven TIs within the Munduruku’s traditional lands in the Tapajós region have been legally recognized or are being formalized, totalling over 3.7 million ha<sup>9</sup> – an area the size of Belgium. In 2024 the government completed a key step towards establishing the 178,173 ha Sawré Muybu TI, which is now awaiting President Lula’s final approval.<sup>10</sup>

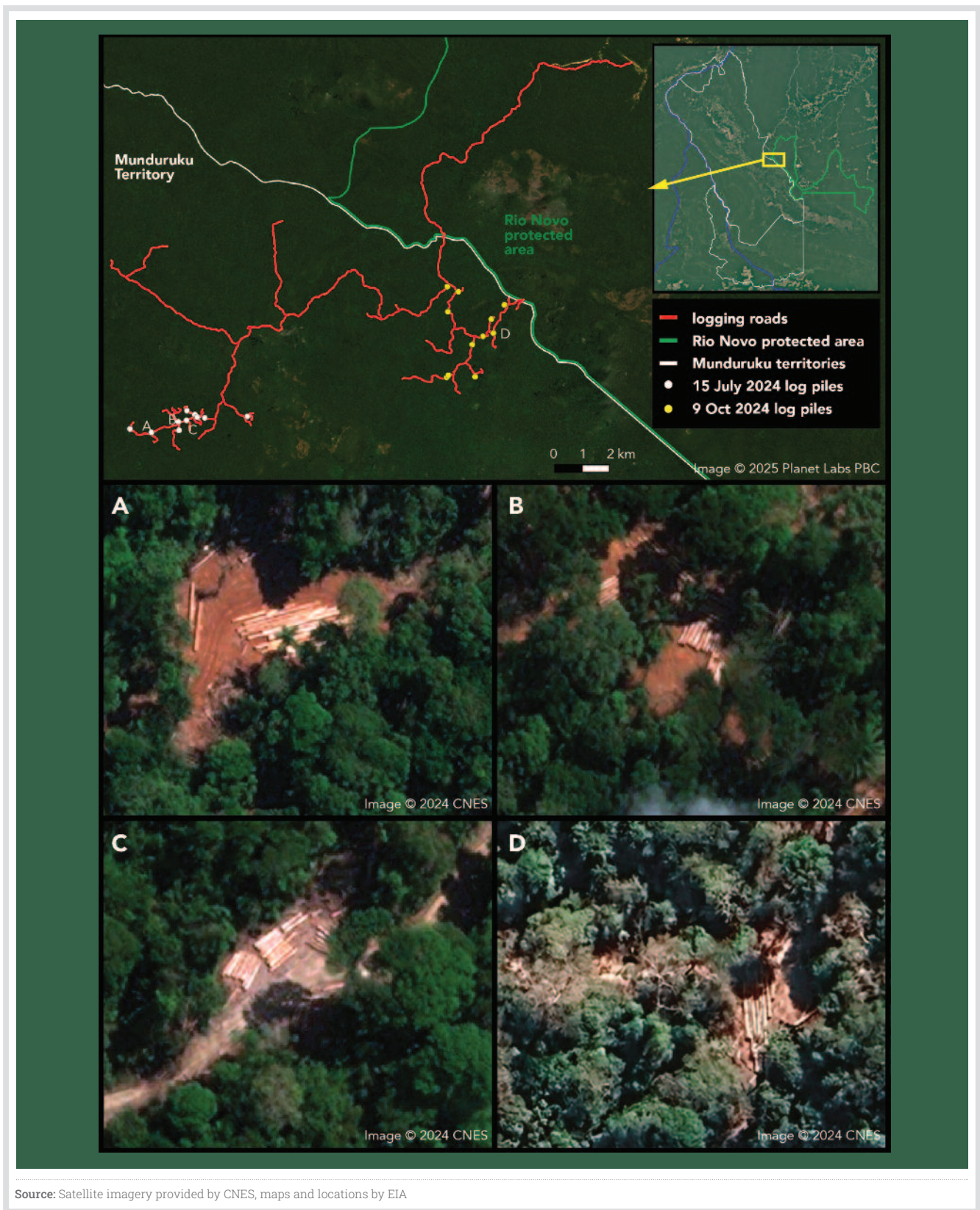


Figure 2  
 EIA used high-resolution satellite imagery to analyze a massive illegal logging operation that took place in Munduruku Indigenous Territory in 2023-24. The upper panel shows the location of roughly 60 km of logging roads and 21 log piles containing an estimated 1200 m<sup>3</sup> of timber inside Munduruku Territory. The lower panels show examples of log piles (A – D) visible in 30 cm resolution Pléiades Neo satellite images taken on 15 July 2024 and 9 October 2024.

These territories lie along the western edge of Brazil's infamous "arc of deforestation," forcing the Munduruku to monitor their vast and highly threatened lands with little government enforcement. Despite legal recognition, the Munduruku TI has been heavily invaded by illegal gold miners in recent years, with hundreds of mercury-contaminated mining sites and over 20 illegal airstrips identified.<sup>11</sup> Since 2020, a series of orders by Brazil's highest court have obliged the government to protect the rights and safety of the Munduruku and other Indigenous peoples. In addition, the Inter-American Court of Human Rights (IACHR) has issued a precautionary measure ordering stronger protection for the Munduruku, including action on threats to their leaders.<sup>12</sup> After continued inaction, in November 2023 the Brazilian courts gave government agencies 60 days to draft a plan and one year to implement it.<sup>13</sup>

In late 2024, the government launched a major law enforcement initiative to expel illicit miners from the Munduruku TI.<sup>14</sup> Yet while preparations were underway, a large illegal logging operation was active within the TI. Using high-resolution satellite imagery, EIA mapped the scale of the crime. Between October 2023 and November 2024, about 60 km of logging roads were cut through previously intact forests within the TI (see map in Figure 2). Access to the area was opened by a 14 km road from an apparent illegal mining site and airstrip in the adjacent Rio Novo protected area (Parque Nacional do Rio Novo). High-resolution satellite imagery reveals

hundreds of logs piled along roads and landings, estimated at over 1,200 m<sup>3</sup> of timber in total (see Figure 2 for example images).<sup>15</sup> Logging inside the TI appears to have ended in November 2024, coinciding with the government's crackdown on mining. By then, EIA estimates that roughly 5,000 ha of pristine forest had been logged – enough to yield several thousand cubic meters of Ipê alone, and many times this amount if other valuable species were also being extracted.<sup>16</sup> Recent government assessments indicate the area is rich in Ipê and Cumaru.<sup>17</sup>

The Munduruku have repeatedly urged the government to do more to stop invasions of their territories.<sup>18</sup> Although recent enforcement against illegal mining greatly reduced activity in the TI, the Munduruku and EIA have documented new mining expansion since the operation ended in February.<sup>19</sup> We have yet to receive a response to a formal complaint to the government about the illegal logging operation, and no one has been held accountable for the crime or for profiting from the large volume of high-value timber likely laundered into Brazil's wood product supply chains and potentially exported to the U.S. or EU.

In the next section, we provide evidence of how timber logged in unauthorized areas can easily be laundered into the supply chain using official documents from licensed areas.



Photo: Coletivo Audio Visual Wakoborün

Members of the Wakoborün Women's Association in front of newly posted signs marking the boundary of a Munduruku territory.



Source: Wikimedia Commons. Credit: Marizilda Cruppe/Amazônia Real

## CASE STUDY 2: Fazenda Odila and Evidence of Laundering Linked to EU and U.S. Markets

An apparently legal logging operation in Pará state's Óbidos municipality (Figure 3) – known as the “throat of the Amazon,” where the river reaches its narrowest point – on closer examination appears to involve a vast timber-laundering scam that generated about US\$2 million in domestic and export sales, with links to U.S. and EU Ipê importers, including one whose affiliated company has supplied Ipê decking for luxury hotels.

### What was authorized – and what really happened

Between June 2021 and June 2022, Pará's environmental secretariat, SEMAS, approved the harvest of 16,921 m<sup>3</sup> of timber at Fazenda Odila<sup>20</sup> – enough logs to fill a freight train 3 km long.<sup>21</sup> The reported owner of the property had received an IBAMA fine in 2018 for presenting false information in official documents related to logging, in an ongoing case<sup>22</sup> – an early red flag. Subsequently, between November 2021 and June 2022, official transport permits reported that 16,373 m<sup>3</sup> left the site.<sup>23</sup> Yet satellite imagery for the period shows no industrial-scale logging or skid trails – and only a small access road appearing in October 2021, insufficient to explain those volumes (see Figure 4). Independent monitoring commissioned by EIA from experts likewise detected no pre- or post-harvest disturbance commensurate with the alleged volumes transported.<sup>24</sup>

Other signs of laundering in this case, detailed previously in EIA's *Tricks Traders and Trees* report, include the fact that the volume of Ipê authorized for felling (224.75 m<sup>3</sup>) corresponded too closely to its alleged transported volumes (224.09 m<sup>3</sup>)<sup>25</sup> – leaving no allowance for

defective trees, measurement errors, breakage, or conversion losses, suggesting the volumes were fraudulently inflated to launder timber cut elsewhere.

Official transport permits then claim the timber went to 11 sawmills,<sup>26</sup> 10 of them fined by IBAMA or SEMAS for timber-related violations in separate instances (cases ongoing, see Annex 1, Table 3).<sup>27</sup> Between 2022 and 2025, 10 of those mills sold onward to six Brazilian exporters<sup>28</sup> – all of which have also been fined by IBAMA



Source: EIA

Figure 3  
Óbidos municipality in Pará - the location of the Fazenda Odila logging site.

Brazilian Exporters	EU and U.S. Importers	Country of import	Species	Product	Volume (m <sup>3</sup> )	Years
AMAZON COMERCIO ATACADISTA E EXPORTACAO DE MADEIRAS LTDA	CEB	France	Cumaru	Decking	40.63	2023
AVG COMERCIO E EXPORTAÇÃO DE MADEIRAS EIRELI	J.P.VIEIRA DE ANDRADE LDA	Portugal	Ipê	Decking	15.11	2025
X P IND. COMÉRCIO E EXPORTAÇÃO DE MADEIRA - EIRELI	GULFSTREAM TRADERS LTD	Germany	Cumaru	Decking	19.02	2023
M I COMÉRCIO DE MADEIRAS LTDA	GLOBAL FOREST LUMBER COMPANY LLC	U.S.	Ipê	Decking	18.66	2023
M I COMÉRCIO DE MADEIRAS LTDA	SABRA INTERNATIONAL INC	U.S.	Ipê	Decking	19.12	2023
TAPANA COMERCIO DE MADEIRA EIRELI	INTERNATIONAL LUMBER IMPORTS INC	U.S.	Cumaru	Decking	18.68	2022 + 2023
VIMEX - VITORIA EXPORTAÇÃO DE MADEIRAS LTDA	SPECIALTY WOODS INC	U.S.	Cumaru	Decking	10.59	2023

Table 1  
 EU and U.S. timber shipments declared on export transport permits as originating from Fazenda Odila (2022-2025). EIA counted only volumes claimed exclusively from Odila, but these were mixed with products declared from other sites, effectively tainting all of it and meaning the total imported batch is higher than shown in this table.<sup>31</sup>



Figure 4  
 Satellite images of Fazenda Odila between June 2021 and June 2022.



France is an importer of high-risk tropical wood from the Amazon. Pictured: the port of Le Havre.

in different cases<sup>29</sup> (see Annex 1, Table 4) – who then shipped to four U.S. and three EU importers,<sup>30</sup> (Table 1) calling into question their compliance with the Lacey Act and the EUTR. Three of the U.S. importers, Sabra International, Specialty Woods, and Global Forest Lumber Company, were exposed by EIA in 2025 for purchasing tainted timber, implying recurrent due diligence problems and raising more questions about their compliance with the Lacey Act.

In addition, some pig iron exports were sent for shipping using official transport permits that listed Fazenda Odila – alongside other logging sites – as a supposed legal source of the wood used to make the charcoal powering its production, linking it to all the evidence indicating Odila was used as a laundering vehicle.

Because each transport permit mixed charcoal from several logging sites, including Odila, the entire pig iron batch should be considered tarnished, since it is impossible to tell which portion of it was produced with the suspect wood.

This apparent system of false declarations fed a high-value supply chain: between 2022 and 2025, official records show that timber and pig iron linked to Odila were sold for about US\$2 million in Brazil and abroad, illustrating how a single illegal logging front can inject substantial value into domestic and export markets.<sup>32</sup> The next case provides more evidence of illegalities, this time linked to EIA's previous report and once again involving illegal gold mining and logging.



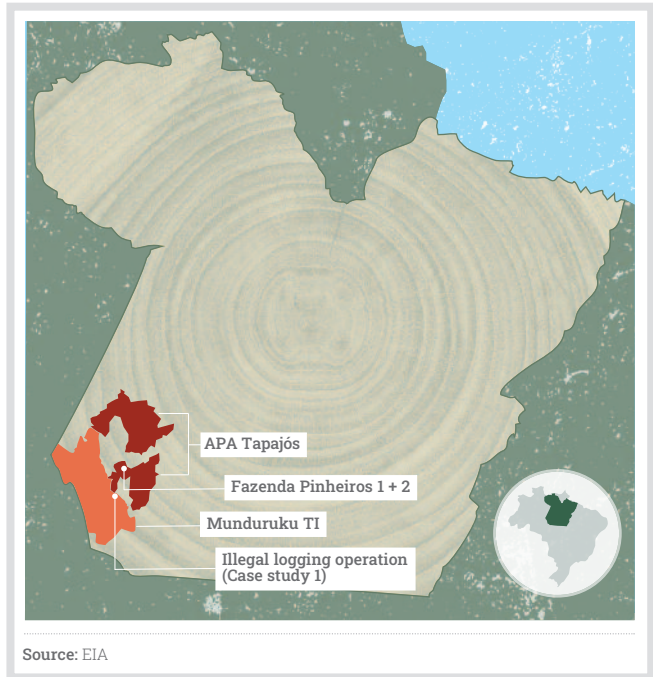
Source: Wikimedia Commons. Credit: IBAMA

Many sawmills and exporters supplying the EU and U.S. markets have been repeatedly fined by Brazilian authorities for legal violations.

### CASE STUDY 3: Fazenda Pinheiros 2 – The Illegal Gold Mining and Logging Operation Linked to EU and U.S. Markets

EIA's *Tricks, Traders and Trees* report revealed that logging site Fazenda Pinheiros 1 in Pará, within a protected area known as the "Área de Proteção Ambiental (APA) Tapajós" (Figure 5), transported over 11,000 m<sup>3</sup> of timber despite illegal mining detected there in 2022 by Brazil's space institute (INPE) rendering the entire operation illegal. IBAMA embargoed the site in August 2024, but by then, sawmills had sent some of the timber to exporters – many fined for timber-related illegalities – who shipped it to 14 importers, including nine in the U.S. and three in the EU.<sup>33</sup> This investigation now reveals that the same network behind Fazenda Pinheiros 1 ran a parallel operation in a neighboring site, exporting more tainted timber to the U.S. and Portugal, involving some of the same importers and likely violating the Lacey Act and EUTR.

**More illegal mines and evidence of lumber crimes**  
Fazenda Pinheiros 2 consists of two adjoining logging sites along Fazenda Pinheiros 1's southern border: the



Source: EIA

Figure 5  
Location of Fazenda Pinheiros 1 and 2 in the APA Tapajós and the illegal logging operation in the Munduruku Indigenous Territory documented in this report, in Pará.

western site is owned by Manoel Costa Souza, and the eastern one belonged to Marleni Maria Ficks (deceased as of 2023<sup>34</sup>) – both were business partners in a mining company and other rural property ventures.<sup>35</sup> Together, the two sites were authorized to log 38,516 m<sup>3</sup> of timber – about 1,284 truckloads<sup>36</sup> – with Ms Ficks’ permit starting in April 2022 and Mr Souza’s in June 2022, both for two years.<sup>37</sup> Mirroring the pattern seen at Fazenda Pinheiros 1, both sites reported implausibly high volumes of Ipê-roxo – 3.2 m<sup>3</sup> and 3.3 m<sup>3</sup> per hectare respectively.<sup>38</sup> Studies across Pará state that the average density of Ipê trees commonly ranges between 0.2 - 0.7 m<sup>3</sup> per hectare, suggesting the volumes of the species were likely fraudulently inflated to launder timber cut elsewhere.<sup>39</sup> Satellite imagery shows that illegal logging operations, such as those in the nearby Munduruku Indigenous Territory documented in this report, are rampant in the region (see Figure 5).

Satellite imagery analyzed by EIA and independent experts revealed gold mining extending into both sites between August and November 2022 (Figure 6). This raises serious concerns about the legality of their logging operations, since unauthorized mining within a timber harvest management plan area is not consistent with Brazilian laws (see Annex 2). Indeed, Mr Souza’s site was later embargoed by IBAMA,<sup>40</sup> while Ms Ficks’ site was later fined by Pará’s SEMAS for gold mining and deforestation without authorization<sup>41</sup> – once again echoing the same pattern uncovered at Fazenda Pinheiros 1 by IBAMA and exposed in EIA’s earlier report.<sup>42</sup>

Despite this evidence, over 9,570 m<sup>3</sup> of logs were transported from the two sites to three sawmills,<sup>43</sup> two of which – Luis Burim EIRELI and Zimmer Industria e Comercio de Madeiras e Transporte Ltda – were named in EIA’s previous report for buying illegal timber from Fazenda Pinheiros 1 and have had multiple fines issued against them by IBAMA in other instances.<sup>44</sup>

#### Mr Souza’s site

In August 2024, IBAMA embargoed Mr Souza’s site, and after an EIA tip-off in April 2025, blocked his tax ID (CPF) so that any exporter attempting to ship timber from there would trigger IBAMA checks at ports, leading to shipment blocks and fines.

However, before and after the embargo, transport permits show a combined 1,300 m<sup>3</sup> of Ipê-roxo flowed from Mr Souza’s site (AUTEF 274087) to C. Luís Burim, where they were processed and then sold to several exporters. After the embargo and tip-off, they were left holding timber that risked being intercepted by IBAMA during export inspections, while domestic sales, not subject to the stricter federal export checkpoints, carried on. One exporter monitored by EIA, VWA, sold part of its stock within Brazil at a much lower price, likely aware it could face penalties if found holding illegal timber. VWA had paid roughly R\$1.72 million (about US\$324,000) for around 200 m<sup>3</sup> of the lumber in August and September 2024 but recovered only R\$155,000 (around US\$30,000) when it resold 188 m<sup>3</sup> domestically between April and June 2025. This caused a cash loss of about R\$1.56 million (US\$295,000) – or a loss of 96% of the original

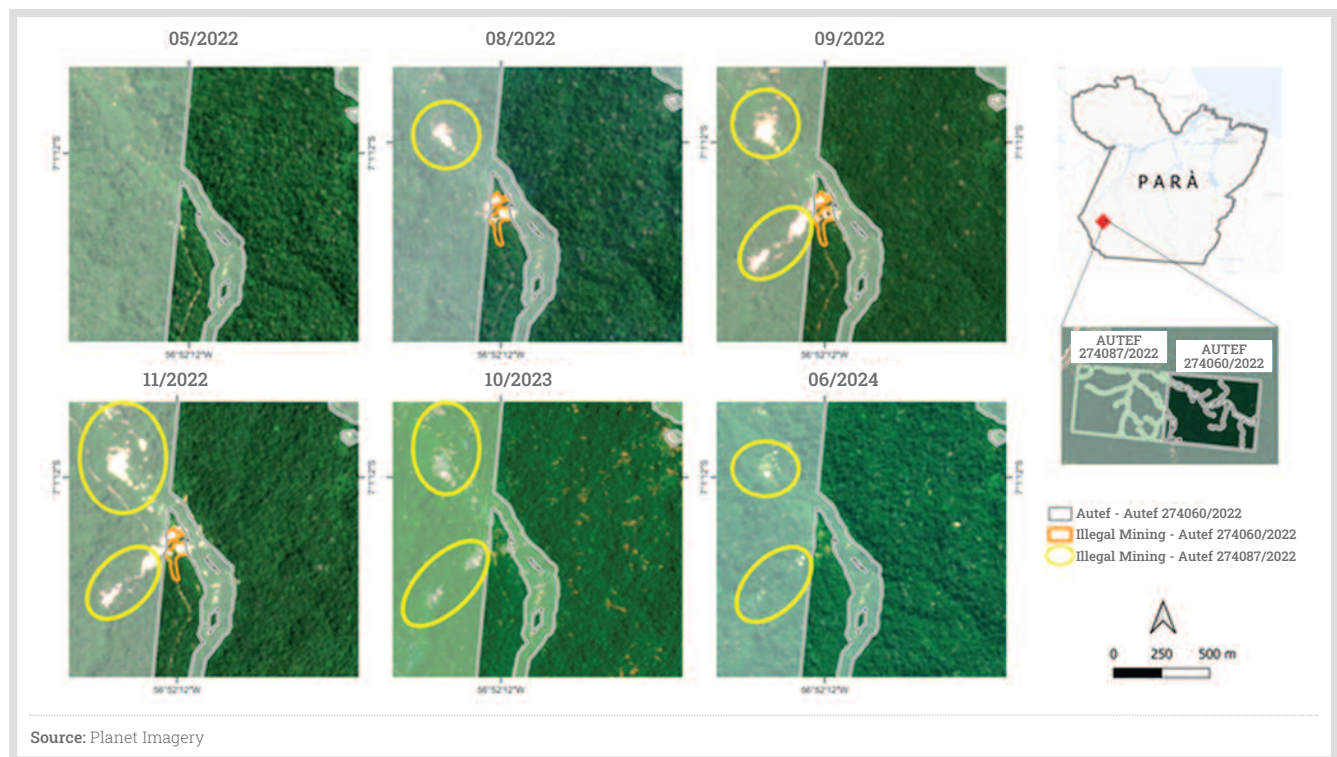


Figure 6  
Illegal gold mining shown crossing the borders of Fazenda Pinheiros 2 logging operations between August and November 2022.



Source: Planet Labs PBC and IBAMA embargo shapefiles

Figure 7  
**IBAMA embargoes in pink covering Fazenda Pinheiros 1+2, with Ms Ficks' site not embargoed.**

purchase cost of the equivalent volume of the product. When considering average export prices for Ipê-roxo, VWA's total loss rises to R\$2.53 million (US\$477,000 - US\$570,000). When enforcement cracks down, the consequences can be costly, yet ultimately the Amazon paid the true price.<sup>46</sup>

#### **Ms Ficks' site and exports to the U.S. and EU**

Ms Ficks' site stands out as a striking case: despite the illegal gold mining, official timber transport permits continued to be issued throughout 2024 under her tax ID (CPF),<sup>46</sup> even though she had died in 2023<sup>47</sup> – a situation that would constitute fraud under Brazilian law if it was found her CPF was being used without her legal consent. If that was the case, due to the fact that Pará's timber transport permits ('Guia Florestal') link each movement of wood to the volumes authorized for harvest in Ms Ficks' name and tax ID, any permits issued after her death would also be considered invalid.<sup>48</sup>

Despite all of the above, about US\$1 million worth of Ipê-roxo was exported by three Brazilian traders – each previously fined by IBAMA, and two linked to EIA's earlier report – to six U.S. importers (five also named earlier) and to one EU firm (Table 2)<sup>49</sup> – all of it claimed to originate from Ms Ficks' site. After these exports, in June and October 2025, SEMAS fined Ms Ficks - even though she had passed away earlier – for unauthorized gold

mining and deforestation within the site.<sup>50</sup> IBAMA had also embargoed Ms Ficks' other logging site in Fazenda Pinheiros 1, but after learning of her passing removed it since it could no longer apply to a deceased person.<sup>51</sup>

Once again, the U.S. firms J. Gibson McIlvain, Timberbase (an affiliate of UFP Industries),<sup>53</sup> International Lumber Imports and Global Forest Lumber – all named in EIA's previous report – were involved in importing yet more tainted timber, showing a pattern of problematic due diligence practices. A Portuguese firm that imported some of the suspect timber described in this case was the recipient of an EU innovation fund to develop decking products a few years prior to the imports in question.<sup>54</sup> Had its implementation not been delayed, the EUDR may well have prevented these imports due to its more stringent due diligence requirements.

EIA's findings provide strong evidence that raises questions about compliance with the U.S. Lacey Act and applicable EU timber laws among several U.S. and EU firms – particularly those previously named in EIA reports. It also shows why delaying the implementation of the EUDR will only permit more imports of commodities linked to the Amazon's degradation and deforestation, enabling those responsible to profit from the rainforests' demise without consequence.

Brazilian Exporters	Importer	Country of import	Species	Product	Quantity (m <sup>3</sup> )
PRIME INDUSTRIA E COMERCIO DE MADEIRAS LTDA	INTERNATIONAL LUMBER IMPORT INC	U.S.	Ipê-roxo	Processed timber	102.077
	J. GIBSON MCLLVAIN CO INC	U.S.	Ipê-roxo	Processed timber	65.7581
	MADEICENTRO- ESTANCIA E SERRACAO DE MAD EXOTICAS LTDA	Portugal	Ipê-roxo	Processed timber	22.8677
	UFP INTERNATIONAL LLC (part of UFP Industries)	U.S.	Ipê-roxo	Decking	46.1637
V W A IND. COMERCIO E EXPORTACÃO EIRELI*	INTERNATIONAL LUMBER IMPORTS INC	U.S.	Ipê-roxo	Processed timber	38.99
	TIMBERBASE (affiliate of UFP Industries)	U.S.	Ipê-roxo	Processed timber	23.212
VIMEX - VITORIA EXPORTACÃO DE MADEIRAS LTDA	GLOBAL FOREST LUMBER COMPANY LLC	U.S.	Ipê-roxo	Processed timber	40.367

\* V W A IND. COMERCIO E EXPORTACÃO EIRELI was fined by IBAMA in 2023.<sup>52</sup> For the remaining exporters' IBAMA fines, check EIA's *Tricks Traders and Trees* report.

Table 2  
Exports of timber from Fazenda Pinheiros 2 (AUTTEF 274060 – Marleni Maria Ficks) to the U.S. and Portugal between 2023 and 2024.

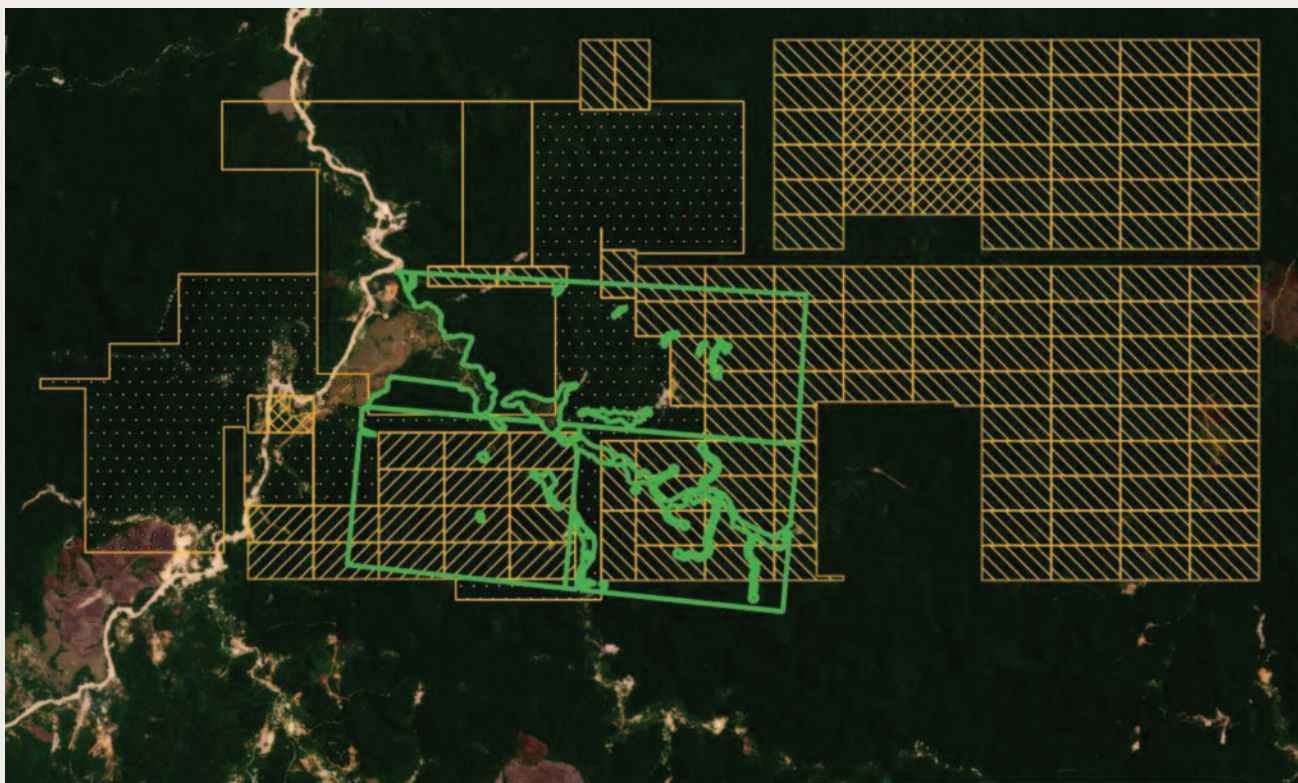


Germany is an importer of high-risk tropical wood from the Amazon. Pictured: the port of Hamburg.

## CONVERGENCE OF CRIMES – ILLEGAL MINING AND ILLEGAL LOGGING GO HAND IN HAND

The two logging sites that compose Fazenda Pinheiros 2 lie within the same mining corridor. Corporate and official records from the national mining agency (ANM) indicate that Marleni Maria Ficks held a nearby gold-mining concession, while Manoel Costa Souza has a long trail of denied or pending mining applications, as detailed in EIA's *Tricks, Traders and Trees* report. Both also have corporate ties to Pinheiros

Mineração Comércio, Exportação e Importação Ltda., whose primary registered activity is the extraction of precious-metal ores. As in the Munduruku case documented in this report, where mining roads opened the way for a 60-km logging network inside the TI, the Fazenda Pinheiros 2 case shows the same dynamic: gold mining sites provide access to the forest, enabling timber to be felled and transported from there.



0 1 2 km

- Autef 273902/2021
- Autef 274087/2022
- Autef 274060/2022
- Mining permit (PLG)
- Mining request - pending
- Exploration request - denied
- Exploration permit - granted

Planet 2022-09 Mosaic

Source: Planet Labs PBC and SEMAS shapefiles of Fazenda Pinheiros 1 and 2, as well as mining shapefiles from the Agência Nacional de Mineração.

Figure 8  
 Satellite image of Fazenda Pinheiros 1 and 2 (in green), overlaid with multiple petitions for gold-mining permits (in yellow) registered by Mr Souza and Ms Ficks, none of which have been approved for gold extraction inside the logging sites.



Hotels at Pompano Beach including the Marriot, where Lumber Plus' Ipê decking was used in a renovation.

## BIG U.S. BRANDS AND EUROPEAN TOURISM CONNECTIONS

One of the U.S. importers linked to Fazenda Odila and Fazenda Pinheiros 2, Global Forest Lumber Company, also exposed in 2025 by EIA for purchasing tainted timber, has links to major brands through the Ipê decking its affiliated Lumber Plus firm<sup>55</sup> provides to contractors that service well-known hotels and venues. In 2025, Deckmasters of South Florida posted multiple Instagram reels claiming that Lumber Plus/Maximo – the company's brand of hardwoods – supplied Ipê to a "Pompano Marriott" resort decking installation.<sup>56</sup> Another reel claims Maximo Ipê was used for a Hyatt Hotel decking project in Wynwood.<sup>57</sup> The Maximo brand also supplied its Ipê decking to a luxury Formula One Miami Grand Prix VIP stand in 2023,<sup>58</sup> marketing it on Instagram, and had its own stand at the race in 2025.<sup>59</sup>

The owner of Global Forest Lumber Company and Lumber Plus, Giovanni Miguel – a Brazilian immigrant to the U.S. who made his fortune in the timber trade – claims in a podcast that he supplies products to Lowe's and Home Depot.<sup>60</sup> The company also claims that "when you buy from Lumber Plus, you are receiving 100% legally harvested lumber."<sup>61</sup> Yet as documented now in multiple EIA reports, none of the big brand venues or customers of Lumber Plus' Ipê can guarantee all of it came from a legal site, nor that it would be compliant with the Lacey Act.

### The French Connection

In *Tricks Traders and Trees*, EIA documented how Portuguese firm Lumber Unipessoal imported Cumaru and Itaúba decking from an IBAMA embargoed logging site.<sup>62</sup> The firm's proprietor also owns two sawmills in



Henry Timber Cumaru decking in the well-known beach des Sablettes in the French Riviera.

Brazil – Luxor and TAP<sup>63</sup> – both fined by IBAMA for timber-related offenses.<sup>64</sup> EIA research has found that this network supplies wood products to well-known clients in France, Belgium, and Portugal. For example, Henry Timber, one of its clients<sup>65</sup> and a major French decking specialist, advertised using “Belem Profile” Cumaru for a redevelopment at the well-known beach des Sablettes in Menton in the French Riviera.<sup>66</sup> While EIA has no evidence this particular wood was illegal or that it came from Lumber Unipessoal, the fact that Henry Timber purchases wood products from Lumber Unipessoal and its affiliated sawmills in Pará – all of which bought lumber from an IBAMA-embargoed site and were also fined by IBAMA – and the high risk associated with sourcing from there, raises questions about what the company is doing to guarantee that its Cumaru is of legal origin.<sup>67</sup>

### Italian Luxury

EIA also previously exposed the Italian firm Sangiorgio Legnami Spa for importing Ipê from Fazenda Pinheiros 1 – a logging site located in a protected area where deforestation for illegal gold mining occurred and which was the subject of an IBAMA embargo.<sup>68</sup> EIA research has found that the Italian firm supplies timber to Ravaioli Legnami, which has supplied Ipê hardwood decking for an array of prestigious architectural and public projects throughout Italy. In celebrated tourist destinations, the company’s materials feature prominently at The Summer Houses and Hotel Cambridge in Jesolo (Veneto), Hotel Caparena in Taormina (Sicily), Agriturismo La



Source: Tournasol 7, Wikimedia Commons

Cittadella Bridge in Alessandria, Piedmont, Italy, featured in Ravaioli’s catalogs using Ipê decking.

Graziosa in Coriano (Emilia-Romagna), and a private lakeside residence on Lago Maggiore (Piedmont-Lombardy). Ravaioli's Ipê has also been used in major public and civic works, including the Cittadella Bridge in Alessandria (Piedmont), the Darsena di Città waterfront redevelopment in Ravenna (Emilia-Romagna), and the Porticciolo di Fano promenade in Marche. Collectively, these projects link Ravaioli Legnami to Italy's most visible tourist regions and to high-profile examples of urban infrastructure built with tropical hardwood.<sup>69</sup> As in the previous case, EIA has no evidence that the wood used in these projects was illegal, but Ravaioli's links to Sangiorgio and the high-risk nature of purchasing Brazilian Amazon hardwoods raise concerns about how Ravaioli ensures the legal origin of its tropical timber.

### Belgian and Austrian Brands

EIA has also learned that Robinson Lumber – likewise exposed by EIA previously for buying Ipê sourced from an illegal logging operation – and Lumber Unipessoal supply Vandecasteele in Belgium; Vandecasteele, in turn, supplies Austrian landscape design firms such as Kramer & Kramer. Public project materials show Kramer & Kramer using Ipê on luxury terraces in a Vienna property estimated to be worth millions of euros.<sup>70</sup> We make no claim that these projects used that supply chain; nonetheless, given Ipê's laundering risk and the illicit share of timber in Pará, as well as the number of exporters and importers linked to buying it, legal origin cannot be assured without geolocated verification and real-time traceable and transparent supply chains – an outcome the EUDR seeks to promote.<sup>71</sup>



Source: Wikimedia Commons. Credit: Ralf Roletschek

Leopoldstat, the district in central Vienna where design and landscaping firms use Ipê decking.<sup>72</sup>



Source: Wikimedia Commons. Credit: IBAMA.

## COMPANY REPLIES

EIA contacted the companies named in this report and requested responses to the findings of its investigation. Lumber Unipessoal responded, stating that, at the time of its purchases of timber linked to the APAGRIFORT logging site, it had obtained a “negative embargo certificate” from IBAMA indicating that no embargo was active on the property, and that APAGRIFORT had been “unblocked in its operations” at the time of the commercial transactions. The company declined to share the certificate upon request, citing data-protection rules, but noting it had been provided to the Portuguese competent authorities during an official inspection.

A copy of the certificate obtained by EIA via other channels showed a 30-day validity period between December 2021 and January 2022. Official export transport permits show that Lumber’s APAGRIFORT-linked imports occurred in April 2021, February 2022, and May 2022, meaning the certificate does not cover

the relevant dates. APAGRIFORT’s IBAMA embargo remains active at the time of writing.

EIA also noted that deforestation within the APAGRIFORT site was detected in July 2019 by Brazil’s National Institute for Space Research (INPE) before IBAMA’s embargo – information also publicly available during the period of Lumber’s imports. In addition, as mentioned before, sawmills affiliated with the importer in Pará have been repeatedly fined by IBAMA for timber-related violations.

Lumber Unipessoal’s full response can be found on EIA’s website.

Vandecasteele also attempted to respond to the claims; however, it was unable to provide EIA with access to the hyperlink where its response was hosted, despite EIA’s repeated requests. At the time of publication, no other companies had responded.

## CONCLUSION

This report comes in the wake of the COP in Belém, where major decisions on tropical forest conservation were discussed, and at a time when EU lawmakers are poised to further delay EUDR implementation – rules that might have prevented imports like those documented in this and other EIA investigations.

The report exposes the ongoing pattern of crimes and impunity in the Brazilian logging sector and sheds light on the current deficiencies of the country's timber traceability system and enforcement efforts, which still allow the movement of large volumes of illegal timber into national and international supply chains, inflicting irreparable harm on Indigenous peoples and the Amazon.

Real-time, field-validated traceability - from inventory to felling, transport, processing and export – combined with increased open-data transparency can help to effectively stop these illegalities. The prosecutor's office of Pará has already started to address the situation by [recommending](#) a range of measures that would significantly improve the system – which should be supported and implemented at the national level.

For U.S. and EU buyers, the cases across EIA's two reports raise serious questions about their due diligence practices under the Lacey Act and the EUTR/EUDR framework, especially where importers have already been repeatedly flagged in prior investigations. Finally, the reports' findings show why it is important for the EU to fully implement the EUDR, and for the U.S. to play its part in effectively enforcing the Lacey Act. Combined, these solutions can help to effectively curb forest crime and protect one of the world's last remaining rainforests.

# RECOMMENDATIONS

## Brazilian government:

- Adopt, at the national level, the Pará State Prosecutor's Office [recommendations](#) to reform timber governance.
- Strengthen satellite monitoring systems to rapidly detect illegal logging activity and enable timely law enforcement responses to prevent damage and timber theft.
- Meet the demands of the Munduruku and other Indigenous peoples by fully resourcing law enforcement agencies to monitor and deter illegal encroachment onto Indigenous lands by miners, loggers and other invaders.

## EU governments:

- Fully implement the EUDR without further weakening or delays.
- Investigate the imports of illegal or high-risk timber from the cases identified in this report for violations of the EUTR and issue appropriate and deterrent penalties.
- Treat all hardwood products from the Brazilian Amazon as high risk under the EUTR and, once in effect, the EUDR, and carry out sufficient checks on operators to ensure appropriate due diligence and compliance with legality, sustainability and human rights requirements.
- Increase coordination with and support for Brazilian federal and state law enforcement agencies to halt illegal logging and associated trade in the Amazon.

## U.S. government:

- Investigate the import of illegal or high-risk timber from the cases identified in this report and strengthen oversight of wood products entering the U.S. from the Brazilian Amazon to ensure compliance with the Lacey Act.
- Increase coordination with and support for Brazilian federal and state law enforcement agencies to halt illegal logging and associated trade in the Amazon.

## EU and U.S. importers:

- Treat all wood products from the Brazilian Amazon as high risk and put in place due diligence systems to ensure effective risk assessment and mitigation; do not source wood for which the risks cannot be fully mitigated.
- Apply the EUTR Expert Group's due diligence recommendations to all timber purchases, including using satellite imagery to confirm legal harvests, verifying timber volumes and conversion ratios against scientific data, tracking logs from the point of extraction through each step of processing, and avoiding sourcing from embargoed areas or companies fined by IBAMA.

## ANNEX 1: Fines and embargoes issued to sawmills and exporters that received timber from Fazenda Odila

Table 3

Sawmills that received timber from Fazenda Odila	IBAMA Embargo	IBAMA fines	SEMAS fine
7.0 INDUSTRIA E COMERCIO DE MADEIRAS LTDA - ME			Yes (2025)
ARNOLDO LOPES SILVA EIRELI		Yes (see EIA's April 2025 report)	
EVEREST INDUSTRIA COMERCIO E EXPORTAÇÃO NO ATACADO DE MADEIRAS LTDA		Yes (2023)	
GRUPO MAIS IND COMERCIO E BENEFICIAMENTO DE MADEIRAS LTDA		Yes (see EIA's April 2025 report)	
INCOM INDUSTRIA E COMERCIO DE MADEIRA EIRELI			Yes (2024)
MADEIREIRA CINCO ESTRELAS EIRELI		Yes (2022)	
MADEIREIRA TIMBER PRIME EIRELI		Yes (2023)	
MADLAMINAS INDUSTRIA E COMERCIO DE MADEIRAS LTDA		Yes (2023)	
R. DE M. LARAS COMERCIO DE MADEIRAS		Yes (2022)	
S S R ALVES IND. E COM. DE MADEIRAS LTDA		No	No
W.S TRINDADE MADEIRAS- ME	Yes (2022)	Yes (2022)	

Table 4

Exporters that received timber from Fazenda Odila	IBAMA fines
AMAZON COMERCIO ATACADISTA E EXPORTAÇÃO DE MADEIRAS LTDA	Fined four times by IBAMA between 2022 and 2023 (see EIA's April 2025 report)
AVG COMERCIO E EXPORTAÇÃO DE MADEIRAS EIRELI	Fined in 2023 for buying illegal timber in a separate, ongoing case (see EIA's April 2025 report)
M I COMERCIO DE MADEIRAS LTDA	Fined six times between 2019 and 2024 in ongoing cases (see EIA's April 2025 report)
MADEIREIRA TIMBER PRIME EIRELI	Fined twice in 2023
TAPANA COMERCIO DE MADEIRA EIRELI	Fined 23 times between 2020 and 2024 in ongoing cases
VIMEX - VITORIA EXPORTAÇÃO DE MADEIRAS LTDA	104 IBAMA fines between 2015 and 2024 worth almost US\$900,000 (see EIA's April 2025 report)
X P IND. COMERCIO E EXPORTAÇÃO DE MADEIRA - EIRELI	Fined in 2023

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## ANNEX 2: Relevant Brazilian Legal Framework Used to Demonstrate Legal Violations in the Case of Fazenda Pinheiros 1 and 2 (Manoel Costa Souza and Marleni Maria Ficks)

This annex summarizes the principal Brazilian laws violated by the operations at Fazenda Pinheiros 1 and 2 and the associated timber supply chain, according to experts consulted by EIA.

### 1. Brazilian Forest Code – Law No. 12.651/2012

([https://www.planalto.gov.br/ccivil\\_03/\\_ato2011-2014/2012/lei/112651.htm](https://www.planalto.gov.br/ccivil_03/_ato2011-2014/2012/lei/112651.htm))

#### Key Provisions:

- a. Article 19: Requires prior approval of a Sustainable Forest Management Plan (PMFS) for the commercial use of native forests.
- b. Article 22: Prohibits forest exploitation that deviates from the approved PMFS or involves forest conversion not explicitly authorized.

#### Relevance:

Both Manoel Costa Souza's and Marleni Maria Ficks' PMFS areas were affected by illegal mining activities and unauthorized deforestation, incompatible with sustainable forest management objectives. According to the law, these activities render both management plans invalid under Articles 19 and 22, as they provide evidence of deviation from the approved PMFS and conversion of native forest without authorization.

### 2. Instrução Normativa MMA No. 5/2006

([https://snif.florestal.gov.br/images/pdf/legislacao/normativas/in\\_mma\\_05\\_2006.pdf](https://snif.florestal.gov.br/images/pdf/legislacao/normativas/in_mma_05_2006.pdf))

#### Key Provisions:

- a. Article 31: Requires suspension of a PMFS when environmental infractions are detected within the management area.
- b. Article 33: Requires cancellation of the PMFS in cases of native forest conversion for unauthorized use.

#### Relevance:

Satellite imagery and INPE alerts confirmed illegal mining and forest degradation in 2022 within both Fazenda Pinheiros 1 and 2 sites. Under this regulation, SEMAS was legally obligated to suspend and cancel both PMFS, but it failed to act, allowing continued issuance of timber credits and facilitating, as indicated by the evidence, the laundering of Ipê-roxo through the supply chain.

### 3. Decree No. 6.514/2008 – Environmental Infractions and Administrative Sanctions

([https://www.planalto.gov.br/ccivil\\_03/\\_ato2007-2010/2008/decreto/d6514.htm](https://www.planalto.gov.br/ccivil_03/_ato2007-2010/2008/decreto/d6514.htm))

#### Key Provisions:

- a. Article 47: Defines as an environmental infraction the unauthorized exploitation of native forest resources without a valid PMFS.
- b. Article 70: Provides the legal basis for embargoes, fines, and cancellation of environmental permits.

#### Relevance:

Logging and export operations from Mr Souza's and Ms Ficks' sites continued even after the emergence of mining and unauthorized clearing, conditions that should have voided the validity of their permits. IBAMA's later embargo on Mr Souza's site (August 2024) and subsequent CPF blocking (April 2025) were grounded in this Decree, confirming the presence of environmental infractions under federal law.

### 4. Law No. 9.605/1998 – Environmental Crimes Law

([https://www.planalto.gov.br/ccivil\\_03/leis/l9605.htm](https://www.planalto.gov.br/ccivil_03/leis/l9605.htm))

#### Key Provisions:

- a. Article 38: Penalizes destruction or damage to forests in legally protected areas, including those under sustainable use regimes.
- b. Article 46: Criminalizes the sale, transport, or storage of forest products without proof of legal origin.

#### Relevance:

The use of what the evidence indicates as fraudulent transport documents (AUTEFs and GFs) to move timber from these sites despite their invalidated PMFS constitutes criminal conduct under Articles 38 and 46. The evidence therefore strongly indicates that both Mr Souza's and Ms Ficks' operations produced timber of illegal origin, which was later laundered through multiple sawmills and exporters.

### 5. Resolution CONAMA No. 406/2009

([https://conama.mma.gov.br/?option=com\\_sisconama&task=arquivo.download&id=578](https://conama.mma.gov.br/?option=com_sisconama&task=arquivo.download&id=578))

#### Key Provision:

- Establishes technical procedures for preparing, analyzing, and approving PMFS in native forests and defines indicators of irregularities.

#### Relevance:

Upon detection of illegal mining and environmental degradation, SEMAS was required to re-evaluate and suspend both PMFS under this Resolution. Its inaction contravened CONAMA's procedural standards and constituted administrative negligence, enabling the continuation of what the evidence indicates as timber laundering operations connected to Fazenda Pinheiros 2.

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