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REPORT

ANALYSIS OF INVESTIGATION DATA ON THE EXPORT OF CAMEROON'S ASSAMELA IN 2019 IN RELATION TO THE QUOTAS PROVIDED FOR IN THE 2019 NDF AND WITH REGARD TO IMPORT DATA IN BELGIUM.

Relai-OI Project (PO 339865)



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List of abbreviations

AAC	Annual Allowable Cut
ACP	Annual Cutting Permit
CF	Community forest
CITES	Convention on International Trade in Endangered Species of Wild Fauna and Flora
EU	European Union
FAO	Food and Agricultural Organisation
FLEGT	Forest law enforcement governance and trade
FMU	Forest Management Unit
FODER	Forêts et développement rural
IFM	Independent Forest Monitoring
MB	Management body
NDF	Non Detrimental Finding
SA	Scientific Authority

1. Executive summary

The general function of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) is to ensure that international trade in species of wild fauna and flora does not endanger their survival. It is in this light and in view of the factors linked to the increase in threats that, the Conference of Parties decided to list the forest species, *Pericopsis elata* (Assamela), in Appendix 2 of CITES.

Cameroon, a CITES member country and producer of *Pericopsis elata* (Assamela), has the obligation to implement the legal provisions of the CITES system, an important element of which is the application of the annual quotas provided for by the NDF, proposed each year by the CITES Scientific Authority and approved by the CITES Management Authority of Cameroon. As a result, this investigation on the export quotas of Assamela from Cameroon - carried out by FODER within the framework of the implementation of the “*Project for independent monitoring of timber supply chains and amplification of information from independent forest monitoring (Relai-OI Project)*” (PO 339865) with the support of the FAO EU FLEGT programme - has the general objective of assessing compliance with the Assamela quotas by each of the operators concerned by 2019 NDF, based on export data for 2019, and import data from Belgium¹ during the same period. It should be noted that this study was initially motivated by the need² in information from IFM on the level of compliance with export quotas of Assamela from Cameroon in 2019 compared to the quotas per operator provided for in the 2019 NDF, expressed by CITES Cameroon stakeholders. And then, the need to deepen the analysis with regard to the Belgian import data of Assamela from Cameroon between 2018 and 2019.

The investigations helped to note the following:

- 1- In 2019, Cameroon exported a total volume of sawn Assamela estimated at 6.906 m³ compared to 6.574 m³ authorised by NDF in 2019, that is, a surplus of 332 m³.
- 2- Four companies including SCT SA, SEFAC, SIM, and STBK exceeded Assamela’s export quota by a total volume of 546.82 m³ compared to the quotas allocated to each of them in the 2019 NDF. This means that nearly 546.82 m³ of Assamela were exported without the advice of CITES SA and therefore, without a permit.

¹ Huge importer of Assamela from Cameroon

² Need expressed during an activity on the assessment of IFM information needs among CITES and RBUE stakeholders, carried out in the framework of the Relai OI project.

Exceeding the quotas required by the NDF, resulting in the export of an additional volume of species without the advice of the CITES SA, and without a permit, is a violation of the provisions of Article 4 (par 2a)³ the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).

- 3- Four (04) operators including BOIS & SERVICES Sarl, CTSC, DINO & FILS, and MBI Sarl exported below the required quotas. This situation may reflect a lack of economic performance of these operators, which must be considered in the definition of quotas when the next NDFs are issued.
- 4- Only eight (08) operators, out of the nineteen (19) concerned by the NDF on the export of Assamela from Cameroon in 2019 exported in 2019, that is, 42.5%.
- 6- Six (06) companies⁴ exported sawn Assamela in 2019, with a total volume of 2.233 m³ and a monetary value of CFAF 597,185,597, without being mentioned in the 2019 NDF. By analysing the registration file of Belgian imports between 2018 and 2019, we note that the year of quotas of these companies was 2018, and that the period of delivery of export permits for Assamela by Cameroon and import permits by Belgium to these 06 companies was towards the end of the 2nd half of 2018 for some and the 1st half of 2019 for others. Given that the CITES permit validation period is 6 months in accordance with the provisions of Article 6 (2) of the CITES Convention, the validity of the permits of these 6 companies does indeed cover the year 2019 and may explain why they exported in 2019 without being in the NDF of 2019. This situation is confusing and suggests the need to match the permit validity period with the year of the quotas.
- 7- Assamela's ACP were almost illegible (see file of 2019 on imports to Belgium) for the Community Forest (CF) 10 01 512 attributed to the CIG "La Terre ne Trompe Pas" whose Assamela was exported by the company Business & Trading Cie in 2019, as well as the CF 10 01 221 attributed to the Association Se'Ekamiliem whose Assamela was exported in 2019 by the company Nambois Sarl. The same applies to the ACP for the CF 10 01 703 of the CIG *Champs Vert* whose sawn Assamela were exported in 2019 by the company SIFOC, which is almost non-existent. This situation makes it difficult to analyse the documents for a better appreciation of the traceability of Assamela from Cameroon imported by Belgium.

³ "The export of any specimen of a species included in Appendix II shall require the prior grant and presentation of an export permit. Such a permit shall satisfy the following conditions: a Scientific Authority of the State of export has advised that such export will not be detrimental to the survival of that species"

⁴ STE DES GRUMES DU CAM, STE BK BUSINESS, PALLISCO SARL, SIFOC, BUSINESS et TRADING CO, STE NAMBOIS

- 8- The company, BK Business, exported Assamela from CF 10 02 643 allocated the Condong - NKO Association beyond the export quota required in 2018. That is to say an excess of 70.103 m³ compared to the authorised volume. The same applies to the company SIFOC which would exceeded by 64.427 m³, the quota authorised in 2018 for the export of sawn Assamela from CF 10 02 050 allocated to the Codoum Association.

In view of all the above, we recommend that the CITES MB and the CITES SA flora Cameroon should:

- instruct a thorough verification of compliance with the authorised quotas from the operators concerned by the 2019 NDF, with a view to taking the results into account in the issuing of the next NDFs.
 - carry out a control mission to the companies that exported Assamela in 2019 and cross-check the data with those contained in the declaration forms that they sent to CITES SA flora, in order to prepare for the issuing of the next NDFs;
 - monitor and evaluate the past performance of companies when defining their quotas for the next NDFs, and sanction companies that exported in excess of the required quotas, as provided for by the regulations in force.
 - review the setting of export quotas for CITES species on the basis of the exploitation inventories of the permits concerned by the exploitation.
- 9- Matching the quota years with the periods of issue of export documents in order to facilitate the traceability and verification of the legality of the source of supply of Assamela imported each year by Belgium, and ensure that the times when operators apply for export permits and the recipient country issues import permits are such as to facilitate compliance with the quota years.
- Ensure the improvement of the legibility of the operating documents and make available all the documents enabling the legality of Assamela produced in CF 10 01 512 attributed to the CIG *La Terre ne Trompe Pas*, CF 10 01 221 attributed to the Association *Se'Ekamiliem*, and CF 10 01 703 of the CIG *Champs Vert*.

2. Context and justification

The “*Independent Monitoring of Timber Supply Chains and Amplification of Information from Independent Forest Monitoring Project (Relai-OI Project)*” is implemented by FODER with the support of the FAO EU FLEGT programme. The objective of this project is to develop and implement a methodology for independent monitoring of timber supply chains and to strengthen the follow-up of IM recommendations at national level through the involvement of EUTR stakeholders (PPP-EUTR) and CITES management bodies (CITES-MBs). Within the

framework of the execution of the project, FODER ensures among others, the realisation of investigation missions on timber circuits, notably on the basis of the information needs resulting from IFM formulated by the various national and international stakeholders previously met within the framework of an evaluation of their needs. This is what justified this investigation on to the analysis of export quotas of Assamela from Cameroon in 2019 by the 19 companies concerned by NDF in 2019, with a look at the import data of Assamela in Belgium between 2018 and 2019.

Thus, the main question underpinning this work is whether the export quotas of Assamela (*Pericopsis elata*) from Cameroon in 2019 are consistent when compared with the 2019 NDF quotas? Which companies have complied with the quotas, which have not, and how can this be understood? What analysis should be made with regard to the quotas imported by Belgium in the same year? What recommendations for the CITES SA and/or the CITES MBs flora of Cameroon?

While recalling that this work is part of the overall framework of the implementation of the above-mentioned project, FAO is doubly aware of the threats to the forest species listed in Annex 2 of the Washington Convention and the difficulties of proper forest law enforcement. Through this project implemented by FODER, it intends to support the implementation of the FLEGT Action Plan by improving forest governance and providing technical assistance.

3. Objectives

1. Inform on the level of compliance of Assamela's quotas exported in 2019 with respect to the quotas authorised in the NDF issued in 2019 for the companies concerned;
2. Assessing the facts with regard to Belgian import data;
3. Analyse the situations observed with reference to the CITES Convention, and make recommendations.

4. Methodology

Data on the 2019 export quotas of Assamela by the various companies concerned by 2019 NDF on Assamela were collected from the declaration and validation services of the Douala Port Authority and completed with data provided by the Directorate General of Customs in Yaounde. The data thus obtained made it possible to make a comparison with the quotas provided for in the 2019 NDF to identify the companies that complied or not with the quotas required by the notice.

The data in the table/file of imports from Assamela (in Belgium)⁵ were obtained from the Belgian CITES actors. This allows us to understand the movement of imports and to assess them also with data provided by the Cameroonian Customs.

The information thus obtained was cross-referenced, then analysed with reference to laws and regulations, and recommendations formulated for the attention of the SA and the CITES MB - Flora of Cameroon.

5. Composition of team

This work was carried out by a team composed of:

- A forester, design engineer, team leader;
- A quality expert, trained in IM, member.

6. Outcomes

6.1. Situations observed

❖ Assamela export quotas (sawn) under NDF 2019

No.	Company	Harvest potential (m ³)	Total harvest quota (m ³)	Total quota of sawn (m ³)
1.	BOIS & SERVICES Sarl	476.82	476.82	190.73
2.	CTSC	2773.03	1087.07	397.14
3.	DINO & FILS	1398.46	1060.86	312.64
4.	MBI Sarl	849.64	683.37	273.35
5.	SCT SA	113.13	113.13	45.25
6.	SEFAC	2019.04	980.37	409.47
7.	SIM	7719.03	2076.37	619.68
8.	STBK	5251.71	1386.48	555.28

Source: Excerpt of 2019 NDF in Cameroon on Assamela.

❖ Customs data (Port of Douala) on the volume of Assamela exports (sawn) per company in 2019

No.	Company	Origins	Volume declared by the customs service (m ³)
1.	BOIS & SERVICES Sarl	Cameroon	165
2.	CTSC	Cameroon	212
3.	DINO & FILS	Cameroon	248
4.	MBI Sarl	Cameroon	151
5.	SCT SA	Cameroon	103
6.	SEFAC	Cameroon	542
7.	SIM	Cameroon	970
8.	STBK	Cameroon	562

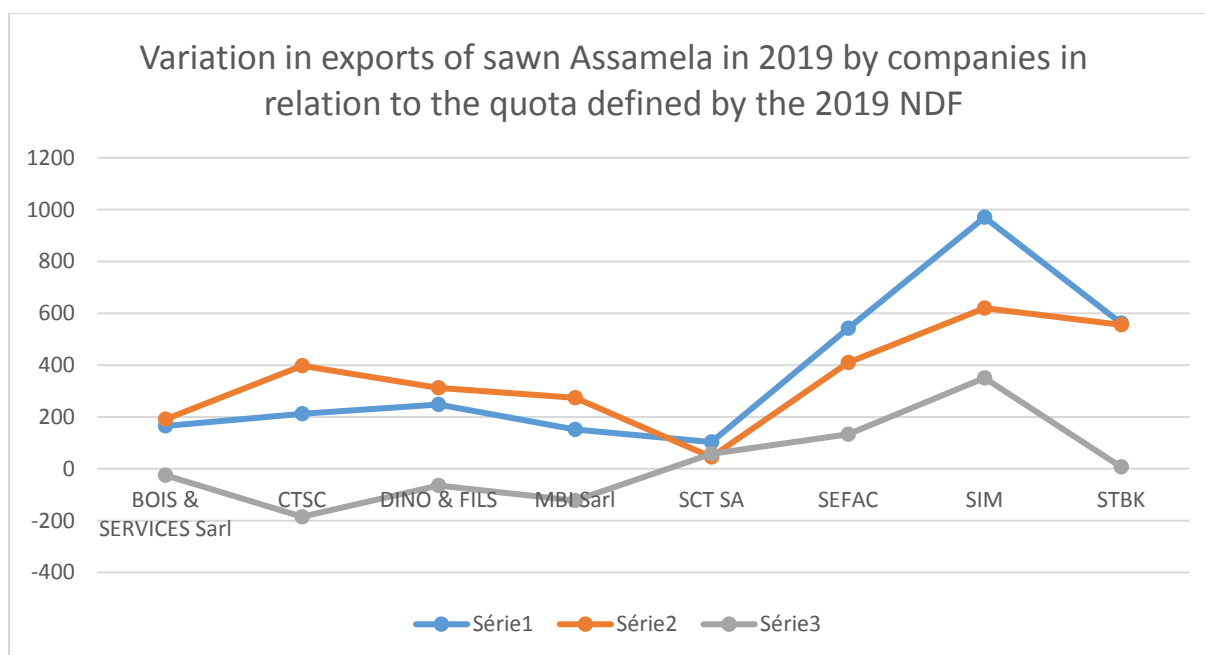
⁵ Belgium is one of the biggest consumer of Assamela from Cameroon

Total	2 953
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Source: Excerpt of data from the Directorate General of Cameroonian Customs (DGD) on the exportation of Assamela from Cameroun in 2019

❖ **Summary data of exports of sawn Assamela in 2019 by exporting companies compared to the quotas defined in the 2019 NDF**

No.	Company	Volume declared by the customs service in m ³ (A)	Total quota sawn in m ³ (B)	Discrepancy (A-B)	Observations
1.	BOIS & SERVICES Sarl	165	190.73	-25.73	Quota not reached, which may reflect a lack of economic performance
2.	CTSC	212	397.14	-185.14	
3.	DINO & FILS	248	312.64	-64.64	
4.	MBI Sarl	151	273.35	-122.35	
5.	SCT SA	103	45.25	57.75	Non-compliance with quota/exceeding the quota
6.	SEFAC	542	409.47	132.03	Non-compliance with quota/exceeding the quota
7.	SIM	970	619.68	350.32	Non-compliance with quota/exceeding the quota
8.	STBK	562	555.28	6.72	Non-compliance with quota/exceeding the quota



Key

- Volume of sawn Assamela declared by the customs services of the Douala port
- Sawn Assamela quota defined by the CITES Scientific Authority
- Discrepancy noted on the quotas defined by the CITES scientific authority

Interpretation:

Looking at the results obtained in the summary table above, it is clear that:

- 1) 4 companies including BOIS & SERVICES Sarl, CTSC, DINO & FILS and MBI Sarl respected their export quota defined for the 2019 financial year. The value of the discrepancies of each of these companies is negative, which means that the volume of timber transiting through the Douala port is below the volume set by the scientific committee;
- 2) 04 companies namely SCT SA, SEFAC, SIM and STBK did not respect their export quota for the year 2019. It can be seen here that the value of the discrepancies for each of the companies is positive, which reflects the fact that the volume of Assamela exported exceeded the maximum quota set by CITES SA.

The mission recommends to CITES SA and CITES MBs flora to monitor and evaluate the past performance of companies when defining their quotas for the next NDF issuance, and to sanction provided for by the regulations in force against companies that have exported in excess of the required quotas.

6.2. Other observations made

- Only Eight (8) operators out of the nineteen (19) concerned by the NDF on the export of Assamela from Cameroon in 2019 exported in 2019, that is, 42.5%. Therefore, an in-depth analysis of the economic capacities of operators deserves attention within the framework of the issuance of NDFs.
- Six (06) companies whose names are contained in the table below exported Assamela in 2019, and are not in the 2019 ACNP. The total volume thus exported is **2.233 m³ of Assamela** with a monetary value of **CFAF 597,185,597**.

Companies	Origin	Volume exported in 2019 (m ³)	Price in CFAF
STE DES GRUMES DU CAM.	Cameroon	208	159 839 876
STE BK BUSINESS	Cameroon	905	147 967 308
PALLISCO SARL	Cameroon	191	136 414 785
SIFOC	Cameroon	701	115 354 226
BUSINESS ET TRADING CO	Cameroon	148	24 385 167
STE NAMBOIS	Cameroon	80	13 224 235
	Total	2 233	597 185 597

Source: Data from the Cameroonian Directorate General of Customs (DGD), 2019

In addition, the table extracted from the Belgian imports of Assamela (*See annex 1*) allows us to make a certain number of remarks related to these 6 operators:

- 1- The period of issuance of export permits by Cameroon and import permits by Belgium to these 06 companies is:
 - towards the end of the second half of 2018 and the beginning of 2019 for certain operators, including the company SIFOC for the export of Assamela from CF 10 02 050, CF 10 01 688 and FC 10 01 304 allocated respectively to the Association Codoum, the CIG *Mbo'O Ngwat Wa Pil Dum* and the Association *Azomi*; the company *Business & Trading Cie* for CF 10 01 512 allocated to the CIG *La Terre ne Trompe Pas*, and for which the quota was 2017.
 - in 2019 for other companies, in particular PALLISCO, for the export of Assamela from FMU 10 039 AC3-5 of which *La Forestière de Mbalmayo* is the assignee; the company BK Business for the export of Assamela from CF 10 02 643, CF 10 02 256, CF 10 01 715, FC 10 01 721, FC 10 02 076, FC 10 01 379, CF 10 02 058, CF 10 02 643 allocated respectively to the Association *Condong - NKO*, CIG *Alcoba*, CIG *Emerdi de Dioula*, CIG *Apengo 120*, CF *Convinko de Nkoakom*, CIG *Minabadjeulaka*, Association *Codel de Lelene*, Association *Condong - NKO*; the company *Nambois sarl* for the export of Assamela from CF 10 01 221 attributed to the Association *Se'Ekamiliem*; SIFOC for timber of CF 10 01 142, FC 10 01 703, CF 10 01 304, attributed respectively to CIG *Lelignoli*, CIG *Champs Vert*, Association *Azomi*, GRUMCAM for the FMU 10 023 AC4-4 attributed to the *Société Forestière de Commerce et de Service*; the company *S2TBED* for the export of Assamela from CF 10 02 714, and CF 10 01 386 to which the Association *Soueka Menguel* and *Nkat Ne Kouom* are respectively assigned.

In view of these facts, it would be necessary to match the years of quotas with the periods of issuance of export documents, to enable operators to comply with the requirements of the NDF which is issued each year, and to facilitate the traceability and verification of the legality of the source of supply of Assamela imported by Belgium.

Also, the data in the table taken from the table of Belgian imports and Cameroon exports (*see Annex 2*) points out other facts related to these 6 companies.

- In 2018, Pallisco exported Assamela from FMU 10 039 AC3-5 to Belgium, to which *la Forestière de Mbalmayo* company is assigned; and in 2019 the same species from FMU 10 030 AC3-1 and 10 031 AC3-1 to which Pallisco itself is assigned. These exports were allegedly carried out without presenting the ACP at the level of the Belgian MB (a document also necessary in the production of import permits). The same applies to the company SIFOC which allegedly did not provide the ACP to the Belgian CITES MB for the 2017 exports of sawn Assamela from CF 1002050; as well as to the company GRUMCAM for the 2018 export of sawn Assamela from FMU 10 023 AC4-4 of which *la Société Forestière de Commerce et de Service* is the beneficiary.
- The ACP is almost illegible concerning the CF 10 01 512 attributed to the CIG *La Terre ne Trompe Pas*, whose sawn Assamela were exported in 2019 by the company Business & Trading Cie. The same applies to the ACP of CF 10 01 221 attributed to the Association *Se'Ekamiliem* whose sawn Assamela were exported in 2019 by the company *Nambois sarl*. In addition, the ACP for the exploitation of CF 10 01 703 of the CIG *Champs Vert* whose sawn Assamela were exported in 2019 by the company SIFOC, are allegedly inexistent.
- The BK Business company exported Assamela from CF 10 02 643 allocated the Condong - NKO Association beyond the export quota required in 2018. This is an excess of 70.103 m³ over the authorised volume. The same applies to the company SIFOC which allegedly exceeded by 64.427 m³ the quota authorised in 2018 for the export of sawn Assamela of CF 10 02 050 allocated to the Codoum Association.

In view of these facts, the mission recommends the CITES MB Flora of Cameroon 1) to carry out a verification and control mission of the exploitation operations of Assamela which take place in the titles of which the companies S2TBED, BK Business, SIFOC, Palisco, GRUNCAM, NAMBOIS are operators and/or partners; 2) to improve the legibility of the operating documents and to make available all the documents enabling the legal source of Assamela produced in the CF 10 01 512 attributed to the CIG *La Terre ne Trompe Pas*, the CF 10 01 221 attributed to the Association *Se'Ekamiliem*, and the CF 10 01 703 of the CIG *Champs Vert* to be verified.

7. Analysis of situations observed

According to the rules governing international trade in CITES species, any trade in specimens of a species listed in Appendix II of CITES, such as Assamela, must comply with the provisions of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).

A global analysis of the situations observed, based on data collected at the level of CITES actors, the DGD of Cameroon as well as those collected at the level of Belgian CITES actors, allows for strong presumptions of non-compliance with the quotas provided for in the 2019 NDF for the trade of Assamela from Cameroon in 2019. Indeed, four (04) companies namely SCT SA, SEFAC, SIM and STBK did not respect the export quota of Assamela as provided for in the 2019 NDF for each of them. The value of the discrepancies compared to their 2019 exports is positive, indicating that a total volume of approximately 546.82 m³ of Assamela exported without notice and therefore without a permit was exceeded. Exceeding the quotas required by NDF resulting in the export of a volume of specimens without a CITES SA Notice and without a permit constitutes a violation of Article 4 (para 2a)⁶ the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).

In addition, four (04) other companies including BOIS & SERVICES Sarl, CTSC, DINO & FILS and MBI Sarl exported below the quotas provided for in the NDF for the 2019 financial year. That is to say a total volume of approximately 397.86 m³ of Assamela not exploited. This situation may reflect the insufficient economic performance of these companies, which have under-consumed the required quotas. It is therefore necessary to take this factor into account in setting quotas when issuing the next NDFs.

On the other hand, only eight (08) operators out of the nineteen (19) concerned by NDF for the export of Assamela from Cameroon in 2019 exported in 2019, that is, 42.5%. This situation is difficult to understand and suggests a certain inconsistency at the procedural level (real production capacities of companies concerned by the year of quotas) and provides an

⁶ *The export of any specimen of a species included in Appendix II shall require the prior grant and presentation of an export permit. An export permit shall only be granted when the following conditions have been met: a Scientific Authority of the State of export has advised that such export will not be detrimental to the survival of that species*

opportunity to question the effectiveness of the methods of choice of companies concerned by the NDF on Assamela in 2019.

On the other hand, comparing the companies that exported Assamela in 2019 (Customs 2019 data) with those authorised to export Assamela in 2019 (Summary of authorised quotas per company in 2019 NDF), it emerges that six (06) companies including STE DES GRUMES DU CAM, STE BK BUSINESS, PALLISCO SARL, SIFOC, BUSINESS ET TRADING CO, STE NAMBOIS exported sawn Assamela in 2019 - with a total volume of 2.233 m³ and a monetary value of CFAF 597,185,597 - without being in the 2019 NDF. However, based on Belgian import data for 2019 (provided by the Belgian CITES actors), it can be noted that 2018 was the quota year for these companies, and they only obtained export/import permits towards the end of the 2nd half of 2018 for some and early 2019 for others. This situation may justify the fact that these 06 companies exported in 2019 because the duration of the permit is 6 months from the date of issue in accordance with the provisions of Article 6 (2)⁷ of the CITES convention. However, the situation still leaves a certain inconsistency in the system of traceability and verification of the legality of Assamela's sources of supply in 2019 between the years of authorisation of export/import and the periods of issue of the necessary documents relating to them. If not, the fact that Assamela is exported/imported in 2019 without the companies concerned and their respective quotas being defined in the 2019 ACNP would be a violation of the provisions of Articles Article 4 (paragraph 2a)⁸ (paragraph 2b)⁹ and paragraph 4¹⁰. It would therefore be necessary for CITES SA to update the years of companies' quotas and to take them into account in the following year's NDF issuance.

On the other hand, based on the data in the table of Belgian imports (2017, 2018 and 2019), we note that Pallisco exported Assamela to Belgium in 2018 from FMU 10 039 AC3-5, which is attributed to *La Forestière de Mbalmayo*, and the same species in 2019 from FMU 10 030 AC3-1 and 10 031 AC3-1, which Pallisco itself is assigned to. These exports were allegedly carried out without presenting the ACP at the level of the Belgian MB (documents also necessary in the production of import permits). The same situation is observed for the company SIFOC which allegedly did provide the ACP to the Belgian CITES MB for the 2017 exports of

⁷ *An export permit shall contain the information specified in the model set forth in Appendix IV, and may only be used for export within a period of six months from the date on which it was granted.*

⁸ *a Scientific Authority of the State of export has advised that such export will not be detrimental to the survival of that species»*

⁹ *a Management Authority of the State of export is satisfied that the specimen was not obtained in contravention of the laws of that State for the protection of fauna and flora*

¹⁰ *The import of any specimen of a species included in Appendix II shall require the prior presentation of either an export permit or a re-export certificate.*

Assamela from CF 1002050, as well as for the company GRUMCAM for the 2018 export of Assamela from FMU 10 023 AC4-4 to which the *Société Forestière de Commerce et de Service* is assigned. The same applies to the companies, Business & Trading Cie and Nambois Sarl, which allegedly produced almost illegible ACPs. The failure to present the ACPs to the Belgian CITES MB or the presentation of illegible ACPs could be a manoeuvre to conceal the illegal operations that may have accompanied the obtaining and production of the specimen. These facts do not favour the tracking of the traceability of the timber exported by these operators.

As for the BK Business company, it exported the Assamela of CF 10 02 643 allocated by the Condong-NKO Association beyond the export quota required in 2018. That is to say an excess of 70.103 m³ compared to the authorised volume. The same applies to the company SIFOC for the Assamela of CF 10 02 050 allocated to the Codoum Association which exceeded the authorised quota by 64.427 m³. This means a total volume of 134.53 m³ of Assamela exported without a permit to Belgium in 2018 by the two companies, in violation of the provisions of Article 4 of the CITES Convention.

8. Difficulties faced

The only difficulty was the time taken (almost a month) to obtain the 2019 export data for Assamela from the Directorate General of Customs in Yaounde. Indeed, it was necessary to wait for the authorisation of the DGD to instruct his competent services to make the requested information available.

9. Conclusion and recommendations

The investigation and analysis of the data on the export quotas of Assamela from Cameroon in 2019 (compared to the quotas provided for in the 2019NDF) and the data from the Belgian import file, has made it possible to make observations both at the level of administrative and documentation procedures related to exports/imports, and at the level of the actions of operators on the field. This situation makes it somewhat difficult to better assess the risks of trade in specimens from illegal sources. These observations have enabled the formulation of some recommendations to the CITES SA and the CITES MB: Carry out a detailed verification of the compliance of the operators concerned by the 2019 NDF with the authorised quotas, in order to take into account the results in the elaboration of the NDF of the following years; ensure a more in-depth analysis of the economic capacities of the operators in the framework of the issuance of NDF; carry out a control mission to the companies targeted by the 2019 NDF and cross-

check the data with those contained in the declaration forms they transmit to CITES flora SA in order to prepare the issuance of the NDF of the following year; review the setting of export quotas for CITES species on the basis of the exploitation inventories of the permits concerned by the exploitation; Match the quota years with the periods of issue of export documents; Improve the legibility of exploitation documents and make available all documents enabling the legality of Assamela produced in CF 10 01 512 allocated to the CIG *La Terre ne Trompe Pas*, the CF 10 01 221 allocated to the Association *Se'Ekamiliem*, the CF 10 01 703 of the CIG *Champs Vert*. It would also be necessary for IFM to carry out a more in-depth investigation into the way in which community forests are exploited, and the export/import of Assamela to Belgium.

10. Annexes

10.1. Annex 1: Excerpt from Assamela's import data (Belgian CITES MB)

No. of Import permit	date of issuance	No. of Export permit	date of issuance	06 Companies having exported in 2019 (according to Customs data) but not in NDF 2019	Year quota	NO. CF/FMU	Name CF/FMU
2018/BE10640 /PI	18.12.2018	387	27.09.2018	SIFOC	2018	CF 10 02 050	Association Codoum
						CF 10 01 688	Gic Mbo'O Ngwat Wa Pil Dum
2018/BE10727 /PI	11.01.2019	464	24.10.2018	Business & Trading Cie	2017	CF 10 01 512	Gic La Terre ne Trompe Pas
2019/BE00140 /PI	22.02.2019	19	28.01.2019	PALLISCO	2018	FMU 10 039 AC3-5	La Forestière de Mbalmayo
2019/BE00169 /PI	22.02.2019	25	06.02.2019	BK Business	2018	CF 10 02 643	Association Condong - NKO
2019/BE00199 /PI	22.03.2019	575	07.12.2018	SIFOC	2018	CF 10 01 304	Association Azomi
2019/BE00243 /PI	12.04.2019	63	08.03.2019	SIFOC	2018	CF 10 01 142	Gic Lelignoli
2019/BE00330 /PI	12.04.2019	28	12.02.2019	Société Nambois sarl	2018	CF 10 01 221	Association Se'Ekamiliem
2019/BE00556 /PI	28.06.2019	215	14.05.2019	BK Business	2018	CF 10 01 721	Gic Apengo 120
					2018	CF 10 02 076	FC Convinko de Nkoakom
2019/BE00671 /PI	31.07.2019	355	08.07.2019	SIFOC	2018	CF 10 01 703	Gic Champs Vert
2019/BE00675 /PI	31.07.2019	354	08.07.2019	SIFOC	2018	CF 10 01 304	Association Azomi
2019/BE00694 /PI	06.09.2019	308	25.06.2019	BK Business	2018	CF 10 01 379	Gic Minabadjeulaka
2019/BE00248 /PI	17.10.2019	56	05.03.2019	BK Business	2018	CF 10 02 643	Association Condong - NKO
2019/BE01045 /PI	12.12.2019	720	28.10.2019	GRUMCAM	2018	FMU 10 023 AC4-4	Société Forestière de Commerce et de Service
2019/BE01155 /PI	23.12.2019	834	18.12.2019	SIFOC	2018	CF 10 01 304	

Companies that exported in 2019 (according to Customs 2019 data) without being targeted by the 2019 NDF	Volume of sawn Assamela (m ³) mentioned on the export licence	Year quota	No. CF/FMU	Name CF/FMU	No. ACP/PAO	Volume of sawn Assamela (m ³) mentioned on the ACP/PAO	Authorised volume/ACP/PAO - volume actually exported in 2018
SIFOC	100.427	2018	FC 10 02 050	Association Codoum	970	36	-64.427
			FC 10 01 688	Gic Mbo'O Ngwat Wa Pil Dum	929	268	268
Business & Trading Cie	24.688	2017	FC 10 01 512	Gic La Terre ne Trompe Pas	illegible	193	168.312
PALLISCO	50.449	2018	UFA 10 039 AC3-5	La Forestière de Mbalmayo	1866		-50.449
BK Business	165.321	2018	FC 10 02 643	Association Condong - NKO	954	85	-80.321
	No export permit		FC 10 02 256	Gic Alcoba	561	75	75
	No export permit		FC 10 01 715	Gic Emerdi de Dioula	922	336	336
SIFOC	80.043	2018	FC 10 01 304	Association Azomi	1185	210	129.957
SIFOC	150.241	2018	FC 10 01 142	Gic Lelignoli	599	202	51.759
Société Nambois sarl	81.232	2018	FC 10 01 221	Association Se'Ekamiliem	? Illegible	193	111.768
BK Business	144.165	2018	FC 10 01 721	Gic Apengo 120	874	197	52.835
	?	2018	FC 10 02 076	FC Convinko de Nkoakom	149	100	100
SIFOC	100.763	2018	FC 10 01 703	Gic Champs Vert	?	157	56.237
SIFOC	100.202	2018	FC 10 01 304	Association Azomi	1185	210	109.798
	?		FC 10 01 703	Gic Champs Vert	?	157	157
Pallisco	52.145	2019	UFA 10 030 AC3-1	Pallisco	36		-52.145
BK Business	150.023	2018	FC 10 01 379	Gic Minabadjeul aka	1057	174	23.977
	?		FC 10 02 058	Association Codel de Lelene	969	71	71
SIFOC	150.26	2019	FC 10 02 223	Gic Askam	593	382	231.74
	?		FC 10 02 256	Gic Alcoba	561	75	75
PALLISCO	47.175	2019	UFA 10 030 AC3-1	Pallisco	36		-47.175
PALLISCO	41.64	2019	UFA 10 031 AC3-1	Pallisco	263		-41.64
BK Business	155.103	2018	FC 10 02 643	Association Condong - NKO	954	85	-70.103

GRUMCAM	85.559	2018	UFA 10 023 AC4-4	Société Forestière de Commerce et de Service	1160		-85.559
SIFOC	80.043	2018	FC 10 01 304		1185	210	129.957
	?		FC 10 01 703	Gic Champs Vert	895?	157	157
SIFOC	43.258	2017	FC 10 02 050				-43.258

10.2. Annex 2 : Excerpt from the Belgian import table and the Cameroon export table,
2019