



# INDEPENDENT FOREST MONITORING IN THE CONGO BASIN: TAKING STOCK AND THINKING AHEAD

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## EXECUTIVE SUMMARY

### Highlights

- Launched by international donors and nongovernmental organizations (NGOs) more than 20 years ago, independent forest monitoring (IFM) is a key component of international strategies aiming to improve forest governance and tackle illegal logging.
- New regulations and processes now provide opportunities to expand IFM geographically and apply it to agricultural commodities.
- This working paper evaluates the achievements of IFM in the Congo Basin based on the analysis of 469 IFM mission reports published by 11 IFM organizations between 2001 and 2020.
- Despite political resistance, IFM organizations have delivered significant outcomes including the withdrawal of illegal forest titles and adoption of new ministerial orders improving forest legality and forest governance overall.
- The lessons learned from 20 years of IFM of illegal logging in the Congo Basin can inform the development of emerging forms of IFM; e.g., determining if illegal forest clearing is occurring within agricultural developments, or determining which REDD+ (Reducing Emissions from Deforestation and Forest Degradation) projects are complying with safeguards and achieving promised benefits.
- To improve the efficiency of IFM in the region, expand the model geographically, and move it beyond timber, donors and policymakers should support policy and legal reform institutionalizing IFM, propose long-term

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**Suggested Citation:** Vallée, M., S. Moukouri, V. Vauthier, and S. Labaste. 2022. "Independent Forest Monitoring in the Congo Basin: Taking Stock and Thinking Ahead." Working Paper. Washington, DC: World Resources Institute. Available online at <https://doi.org/10.46830/wriwp.21.00042>.

funding mechanisms for IFM, and promote standardized monitoring and evaluation processes across IFM projects.

- IFM organizations should also improve the utility of IFM data to enforce demand-side measures by further improving IFM efficiency, data quality, and standardization.

## Context

### **Forest crime—including illegal logging, trade in illegally sourced timber, and illegal deforestation for commodities—remains a major obstacle in reducing tropical forest loss.**

It directly degrades forest ecosystems and inflicts the first cut on forests that are too often further degraded, burned, and cleared. Illegal logging also hurts local and national forest economies, is frequently linked to transnational criminal networks, and, in some places, fuels violent conflict and terrorism. For businesses trying to operate within the law, illegal logging gives unfair financial advantage to those who break the law.

While there is no universal definition of *illegal logging*, the Forest Legality Initiative of the World Resources Institute (WRI) defines the term to “include all practices related to the harvesting, processing, transport, sale, and purchase of timber, as defined in the country of origin, as well as any violations of a country’s legal framework that may occur throughout the supply chain” (Noguerón et al. 2018).

The extent of illegal logging activities is difficult to document, therefore making it difficult to monitor. Nevertheless, over the past two decades, the “adoption of timber legality measures [...] involv[ing] independent monitors has strengthened the political basis for action” (Barber and Canby 2018). Since the late 1990s, IFM has been a “feature of international efforts to improve forest governance and reduce illegal logging” and has taken different shapes and forms in different countries at different times (Brack and Léger 2013).

## The Research Problem

### **As new regulations on deforestation-free commodities provide opportunities to expand IFM beyond timber, it is critical to reflect on the 20-year experience of IFM in the timber sector.**

While the concept of IFM first emerged in Cambodia, it is in the Congo Basin where IFM has further developed over

the past 20 years. Understanding how the IFM concept emerged and evolved in the Congo Basin, what IFM organizations have achieved, and what challenges they face is key to improving IFM and informing its expansion to other regions and commodities.

## About This Working Paper

**WRI and its partners, Field Legality Advisory Group (FLAG) and Resource Extraction Monitoring (REM), evaluated the achievements of IFM in the Congo Basin since 2000. This analysis was based on information from 469 IFM mission reports published by 11 IFM organizations between 2001 and 2020.** In this paper, we identify key challenges faced by IFM organizations and propose recommendations for practitioners, policymakers, NGOs, and donors to improve the efficiency of IFM in the region, expand the model geographically, and move it beyond timber.

## Key Findings

**Despite challenges in navigating relationships with governments, IFM organizations have delivered significant outcomes including, but not limited to, the withdrawal of illegal forest titles and the adoption of new ministerial orders improving forest legality and forest governance overall.** Our analysis reveals that more reports were published in the early years of IFM, when fewer IFM organizations were active and fewer countries covered. The highest number of IFM missions was completed in Cameroon, where IFM began, with an average of 14 percent of forest management units visited each year between 2007 and 2013.

## Recommendations

**We propose solutions to tackle political resistance as well as other challenges faced by IFM organizations, including difficulties with accessing information and maintaining credibility.** We also suggest ways to improve IFM efficiency, funding, and visibility before expanding the model geographically and moving it beyond timber. We recommend the following:

- Institutionalization of IFM in national laws and international regulations
- Adoption of IFM quality standards

- Development of an international IFM community of practice, and of more subnational IFM networks
- Negotiation of good memorandums of understanding between IFM organizations and governments supporting better access to information for IFM organizations
- Involvement of other ministries beyond the Ministry of Forests
- Communication of IFM findings to a broader international audience
- Improvement of the utility of IFM data for implementation and enforcement of demand-side measures
- Collection of more data where timber is stored, such as in ports and log yards, in addition to data collected in forests
- Investment in monitoring and evaluation using a regionally standardized set of indicators
- Development of a long-term funding mechanism for IFM
- Further investment in IFM capacity building, including how to best use new technologies
- Investment in capacity building for importers to use IFM data

## 1. WHAT IS INDEPENDENT FOREST MONITORING AND WHAT IS IT SUPPOSED TO ACHIEVE?

### 1.1 Independent Forest Monitoring Definition and Overall Objective

Mbzibain and Tchoudjen (2021) define independent forest monitoring (IFM) as “a third-party assessment of the conformity of forest management and forestry activities with the legislative and regulatory standards in force in the forestry sector of the country.” The overall objective of IFM is to trigger improvements in forest governance that lead to environmental and social benefits through monitoring activities (Figure 1).

### 1.2 How Did the Concept of IFM Emerge and Evolve over Time?

A groundbreaking concept beginning in Cambodia in 1999: Formal collaboration among a government, donors, and a nongovernmental organization to monitor forest crime through IFM

Local civil society organizations (CSOs) and nongovernmental organizations (NGOs) had been independently monitoring forests long before 1999.<sup>1</sup> However, when the expression “IFM” emerged in Cambodia that year, these third-party independent monitoring activities became officially recognized by the government (Global Witness 2013). Funded by several

Figure 1 | IFM Theory of Change



Note: Although the definition of IFM is currently quite stable, the concept evolved as it expanded to new areas over time.

Source: REM author.

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international donors, Global Witness was appointed by the Royal Government of Cambodia as the IFM organization in charge of ensuring reporting accuracy and validation of reports on forest crimes (Brown and Luttrell 2005). At first, the project had positive results including increased documentation of significant forest infractions and exposure of weak government action including collusion with illegal logging. However, the Cambodian government was increasingly unwilling to respond to key IFM findings, causing the IFM organization to increase its advocacy work, in turn further reducing the willingness of the government to collaborate. This downward spiral eventually led to a total breakdown of relationships among the partners and the eventual suspension of the project in 2003 by the government (Brown and Luttrell 2005).

### Scoping and refinement of the concept in Cameroon in 2000: From an independent observer of the allocation process to the first IFM field missions

In the meantime, the IFM concept spread to Cameroon “with a contract for an independent observer to support the process of forest concession allocations [...] in 1999” (Brown and Luttrell 2005). In addition, scoping missions to implement IFM in Cameroon began in 2000 at the formal request of international donors concerned about the country’s severe level of corruption, as Cameroon was ranked last in Transparency International’s Corruption Perceptions Index (Transparency International 1999). Global Witness was appointed to carry out IFM in Cameroon in May 2001. Similar to the situation in Cambodia, tensions arose between the government and the monitor, threatening the feasibility of a full IFM project when the first investigations uncovered illegal logging with a net loss estimated at US\$38 million for the Cameroonian government, further damaging the image of the forest sector (Transparency International 2003).

### Institutionalization of the IFM concept in Cameroon, 2000–2004: The emergence of mandated IFM

Aware of the risk of failure and worsening tensions in Cambodia but also of the high potential of IFM to increase transparency, stakeholders involved in IFM in Cameroon worked to improve the approach. Lengthy negotiations of a memorandum of understanding (MoU)<sup>2</sup> between the government and the monitor occurred, clarifying the monitor’s rights to access specific information and processes, key activities, and the reports publication procedure. By signing this MoU, Global Witness became

a mandated IFM organization.<sup>3</sup> European donors joined forces with the World Bank to financially support IFM by co-funding a long-term project. This funding, combined with the World Bank attaching aid conditionalities to the project, added considerable weight to the institutional framework of the mandated IFM approach developed in Cameroon, laying the foundation for future IFM development in Africa. In the meantime, Global Witness’ advocacy initiatives were triggering resistance from the government and private sector to IFM activities.<sup>4</sup> Despite the MoU, monitors were often affected by repercussions from their findings, including threats of contract cancellation and shifts in funding.

### IFM moves away from advocacy organizations in 2005

In 2003, several key Global Witness staff and consultants who had undertaken the IFM project in Cameroon from the outset in 2000 created a new NGO named Resource Extraction Monitoring (REM), which was exclusively dedicated to the new approach of mandated IFM. In 2005, the Cameroonian government appointed REM as the replacement for Global Witness. At the same time, more stable funding systems were put in place by various donors through calls for tender, and embassies of European countries began providing support to IFM. REM won the 2003 call for tender and subsequent calls, remaining the mandated monitor in Cameroon until 2009. From 2010 to 2012, the Belgian company AGRECO and the Cameroonian NGO Cameroon Environmental Watch acted as IFM organizations, funded by the European Union (EU).

### Expansion to the Congo Basin, 2004–2014: Toward locally based organizations leading IFM

In 2004 and 2005, REM carried out scoping missions to expand IFM in the Republic of the Congo (Congo) and the Democratic Republic of the Congo (DRC). The government in the Congo became the first government not only to accept but to request civil society involvement in mandated IFM. REM and its partner organization, Forests Monitor, were appointed to lead IFM in 2006 by the Congolese minister of forests. In the DRC, after additional scoping missions by Global Witness and REM in 2007 and 2008, REM was appointed in 2010. In the meantime, REM trained local experts who then created organizations specialized in IFM. The Congolese organization Cercle d’Appui à la Gestion Durable des Forêts (CAGDF), created

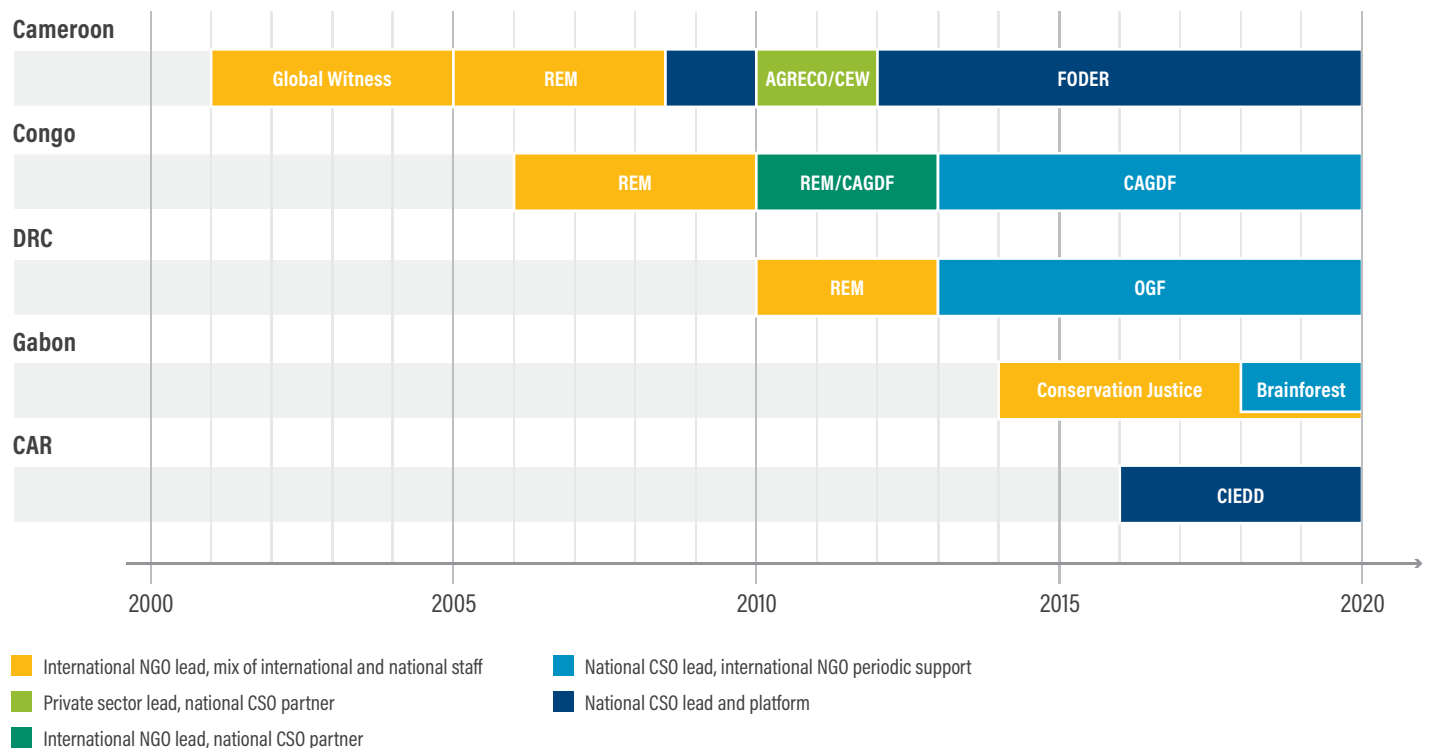
in 2009, began leading IFM in the Republic of the Congo in 2013. Similarly, in the DRC the local organization Observatoire de la Gouvernance Forestière was created in 2012 and became a mandated IFM organization in 2013 (Figure 2).

In Central African Republic (CAR) and Gabon, REM and Forests Monitor introduced the concept of mandated IFM and trained local civil society organizations Centre pour l'Information Environnementale et le Développement Durable (CIEDD) and Brainforest between 2005 and 2012. In 2012, CIEDD and REM carried out the first IFM mission in CAR. In Gabon, Brainforest carried out its first IFM mission in 2019, while Conservation Justice began IFM missions in 2014 with ALEFI (Appui à la Lutte contre l'Exploitation Forestière Illégale), a project designed to tackle illegal logging in Gabon.

Broadening the concept, 2015–2020: From a specific to a more flexible concept

Recently, an increasing number of organizations have been calling themselves IFM organizations. This label is now commonly used to refer to both mandated and external monitors<sup>5</sup> that operate without a mandate but with varying levels of formal collaboration or agreement with governments. The frontier between mandated and external IFM is increasingly blurred, with some CSOs and NGOs mixing strategic elements from both approaches to suit their objectives and increase the impact of their work. For instance, the external IFM organization Forêts et Développement Rural (FODER) signed an MoU with the Cameroonian government providing a framework for collaboration that encourages information sharing and that establishes a process for publishing reports. This includes reviews by a technical and ethics committee. Although this MoU does not only focus on FODER's IFM

Figure 2 | Institutional and Geographic Evolution of IFM Organizations Analyzed in This Paper



Notes: Abbreviations: IFM = independent forest monitoring; DRC = Democratic Republic of the Congo; Congo = Republic of the Congo; CAR = Central African Republic; REM = Resource Extraction Monitoring; CEW = Cameroon Environmental Watch; CAGDF = Cercle d'Appui à la Gestion Durable des Forêts; OGF = Observatoire de la Gouvernance Forestière; CIEDD = Centre pour l'Information Environnementale et le Développement Durable; NGO = nongovernmental organization; CSO = civil society organization.

Source: REM author.

activities, and the composition of its reading committee differs from mandated IFM reading committees, an MoU and reading committees are two typical characteristics of mandated IFM.

Meanwhile, the concept also evolved toward more standardization. In Cameroon, several external IFM organizations worked together to develop a Standardized External Independent Monitoring System (SNOIE) that was certified by the International Organization for Standardization in April 2018 (CIDT n.d.).

In addition, discussions are underway regarding the expansion of the concept to other commodities, including soy, beef, cocoa, rubber, and minerals, and its potential extension to carbon finance (EFI 2021), which could lead to significantly broadening the concept in the coming years. A few IFM organizations have, for instance, tested monitoring REDD+ projects.<sup>6</sup>

### Institutionalization of IFM through voluntary partnership agreements, 2003–2021

In parallel to the developments described above, IFM has been progressively institutionalized since the EU published the Forest Law Enforcement, Governance and Trade (FLEGT) Action Plan in 2003. The FLEGT Action Plan established voluntary partnership agreements (VPAs), each VPA being a legally binding “bilateral trade agreement negotiated between the EU and a timber-exporting country outside the EU [...] to ensure that timber and timber products imported into the EU from a partner country comply with the laws of that country” (EFI 2020). VPA negotiations are multi-stakeholder processes involving civil society in the producer country, including those carrying out IFM. In addition, a number of VPAs “contain some [...] provision for civil society to play a role in monitoring the implementation of the agreement” (Brack and Léger 2013).

Figure 3 illustrates how IFM contributed to the development and implementation of VPAs in Congo Basin countries. All VPAs signed between the EU and countries in the Congo Basin declare that civil society should play a role in monitoring implementation of the agreement. Several of these VPAs include references to IFM in legality assurance or verification systems, interactions with an independent auditor appointed under the VPA, provisions for civil society involvement in VPA implementation, and civil society capacity building in monitoring.

In practice, the negotiation of VPAs between the EU and Congo Basin countries made IFM simpler for civil society. For instance, the VPAs signed in the Republic of the Congo, Cameroon, and Central African Republic include a transparency annex, listing all documents and information that their governments commit to disclose publicly. If properly enforced, these annexes simplify access to information about forest management and harvesting for IFM organizations.

In addition, VPAs include a multi-stakeholder process to define forest legality requirements at the national level in a legality grid. IFM organizations adopted the VPA legality grids as a reference against which to assess legal compliance, increasing the legitimacy of IFM findings.

VPAs even have led some producer country governments to recognize the role of IFM in their laws. For instance, the new Forest Law adopted by the Republic of the Congo in July 2020 explicitly mentions IFM in article 69 (in translation):

*An independent monitor, originating from national civil society organizations and recognized by the government, conducts independent field missions alone or jointly with the agents of the forest government agency. The monitor regularly produces reports and recommendations on compliance with forest legislation (Republic of the Congo 2020).*

However, such laws do not make it mandatory for government agencies to act based on IFM findings.

### 1.3 What Approaches Exist for IFM?

IFM can be accomplished with or without a mandate, which is a formal agreement between an independent monitor and the government. In reality, a range of approaches exists between mandated and external IFM, as shown in Figure 4.

Whether monitors have full access to official documents and to forest areas depends on the content of the formal agreement signed by mandated independent monitors and government officials. The content of these agreements varies over time and across countries. A detailed analysis is provided in Section 4, as well as a list of clauses that an ideal MoU should include. A key specificity of mandated IFM is the participation of government in reviewing reports. In the case of a disagreement between the IFM

Figure 3 | **The Role of IFM in VPA Development and Implementation in the Republic of the Congo**

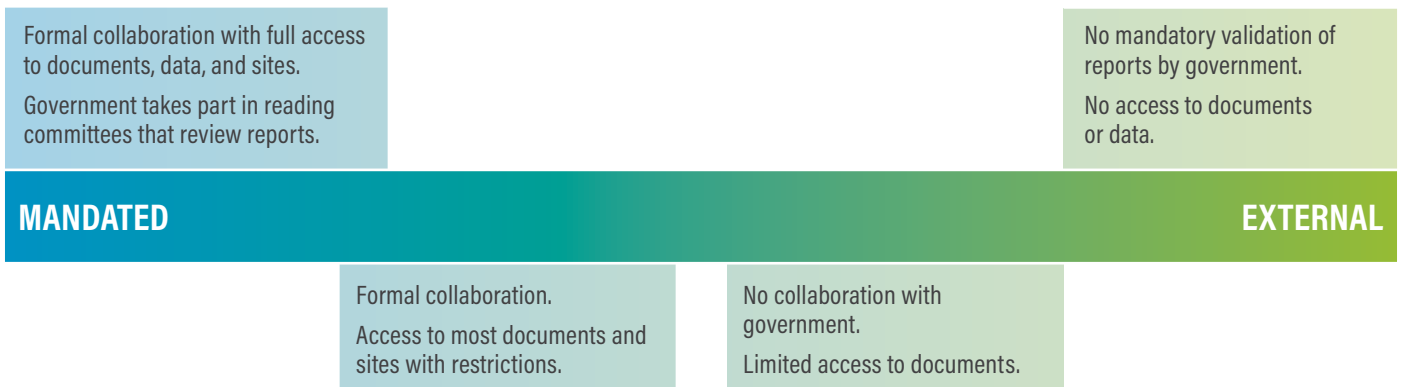


Note: Abbreviations: VPA = voluntary partnership agreement; CSO = civil society organization.

Source: REM author.

Figure 4 | **Range of Approaches between Mandated and External IFM**

**Most IFM programs fall somewhere between mandated and external**



Source: REM and WRI authors.

organization and the government, the government opinion is added as a note to the existing text, and the report can then be approved.

### 1.4 What Is the Mission of IFM?

The following sections focus on IFM in the Congo Basin since 2000, where the mission of IFM is to “analyze and report on forest governance and management, as well as the harvest and transport of timber” (Vallée et al. 2019). In practice, IFM organizations analyze official documentation and visit forests to detect, report, and highlight potential issues (Figure 5). They focus on logging activities conducted by the private sector in

government-owned forests, law enforcement by local government agencies, and forest governance issues in general. Based on the facts observed, monitors draft reports that are shared with the government. In addition, IFM organizations propose recommendations<sup>7</sup> to improve law enforcement. They also follow up on measures taken by the government following these recommendations. Finally, monitors often contribute to forest governance in other ways, including training law enforcement officials on the legal framework and existing tools, policy reform, and financial support to organize joint monitoring missions with law enforcement officials.

Figure 5 | **Activities Performed by IFM Organizations**



Notes: \* Mandated IFM only. \*\* External IFM only. Abbreviations: IFM = independent forest monitoring; CSO = civil society organization; VPA = voluntary partnership agreement; LAS/LVS = legality assurance system/legality verification system.

Source: REM and WRI authors. Photo source: Resource Extraction Monitoring.



## 2. WHAT HAVE INDEPENDENT FOREST MONITORS ACHIEVED IN THE PAST 20 YEARS IN THE CONGO BASIN?

To assess what independent forest monitors have achieved since 2000 in the Congo Basin, forestry experts and lawyers from the Field Legality Advisory Group (FLAG)<sup>8</sup> carried out in-depth research.

### 2.1 Methodology - Data Compilation

FLAG identified 11 organizations that carry out IFM in the Congo Basin as one of their main activities and publish their IFM reports online (Figure 6). FLAG's analysis includes mandated and external IFM reports from either independent missions or missions conducted jointly with national inspectors from the ministry. This analysis covers reports available on IFM organization websites, on the Open Timber Portal,<sup>9</sup> or from other relevant online sources at the time of analysis, in June 2020.

FLAG extracted observations reported by IFM organizations in the 469 mission reports and compiled them in a Microsoft Excel file, with one line for each observation. For each line, FLAG recorded the following: year of mission, country, name of IFM organization reporting, name of company visited by IFM organization, title of report, type and name of forest title visited,<sup>10</sup> facts observed, category of observations,<sup>11</sup> recommendation made by IFM organization, focus area of this recommendation,<sup>12</sup> and measures taken by law enforcement officer.

Table 1 | **List of Organizations Whose Mission Reports Have Been Analyzed**

ORGANIZATION	COUNTRY	NUMBER OF MISSION REPORTS PUBLISHED BETWEEN 2001 AND 2020	NUMBER OF MISSION REPORTS ANALYZED
Global Witness	Cameroon	123	123
REM	Cameroon	91	90
AGRECO	Cameroon	65	58
FODER	Cameroon	67 <sup>a</sup>	64
REM	Congo	45	45
CAGDF	Congo	21	21
REM	DRC	5	5
OGF	DRC	13	12
CIEDD	CAR	6	6
Conservation Justice	Gabon	39	39
Brainforest	Gabon	7	6
<b>Total</b>		<b>482</b>	<b>469<sup>b</sup></b>

Notes: <sup>a</sup> Reports compiled for FODER also include reports produced by FODER's partners through the Standardized External Independent Monitoring System. <sup>b</sup> Thirteen reports were not analyzed because the reports were either missing (six) or not focused on logging (six), or the file was corrupted (one). Abbreviations: DRC = Democratic Republic of the Congo; Congo = Republic of the Congo; CAR = Central African Republic; REM = Resource Extraction Monitoring; FODER = Forêts et Développement Rural; CAGDF = Cercle d'Appui à la Gestion Durable des Forêts; OGF = Observatoire de la Gouvernance Forestière; CIEDD = Centre pour l'Information Environnementale et le Développement Durable.

Source: Based on raw data for years 2001–2020 from Global Witness, REM, AGRECO, FODER, CAGDF, OGF, CIEDD, Conservation Justice, and Brainforest, and modified/aggregated by the Field Legality Advisory Group (FLAG).

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## 2.2 Methodology - Data Analysis

FLAG analyzed the following variables, using Excel pivot tables:

- **Number of forest titles visited by IFM organizations:** A given forest title visited five times by IFM organizations counted as one forest title visited.
- **Number of visits per year (or frequency of visits):** Number of visits IFM organizations carried out per year in the various forest titles, and in other forests (Forêts du Domaine National). For example, IFM organizations conducting three missions in a single forest title and visiting two other forests not covered by a forest title in the same year would total five visits for that year.
- **Total number of missions:** Cumulative total of all missions carried out by an organization. A mission can cover several titles or areas. The identification of a mission is based on three elements: period, team, and official authorization for the mission, or mission order. When these three elements are common in different reports, these reports are considered to result from the same mission. FLAG counted the number of missions manually.
- **Number of observations and associated recommendations:** Each observation and recommendation in a given report was counted only once.
- **Breakdown of observations and recommendations by category and focus area:** FLAG used the categories of observations and recommendation focus areas as described in the section above.

## 2.3 Methodology - Limitations

This analysis does not pretend to be exhaustive, nor does it cover all the IFM mission reports produced in the Congo Basin between 2001 and 2020. It also does not include other types of reports produced by these organizations.<sup>13</sup> This paper is based on a preliminary analysis that could be expanded by analyzing other types of reports and interviewing IFM organizations. Moreover, some of the analysis in Section 2.4 was impossible to conduct for countries other than Cameroon. Indeed, we were unable to access reliable data on the number of attributed forest titles in Gabon, Congo, the DRC, and CAR from 2007 to 2020 because no such compilation exists at this point. In the future, governments and civil society should work together to record the number of forest titles quarterly to allow for consistent analysis at the regional level.

## 2.4 What Has Been Accomplished?

IFM organizations studied by FLAG published a total of 482 investigation reports between 2001 and 2020 (Figure 6), representing an average of 24 reports per year. However, the number of investigation reports varied by year, reaching a high of 52 in 2003 and a low of 4 in 2020, when work ended for several grants funding IFM and the COVID-19 pandemic began, preventing fieldwork worldwide.

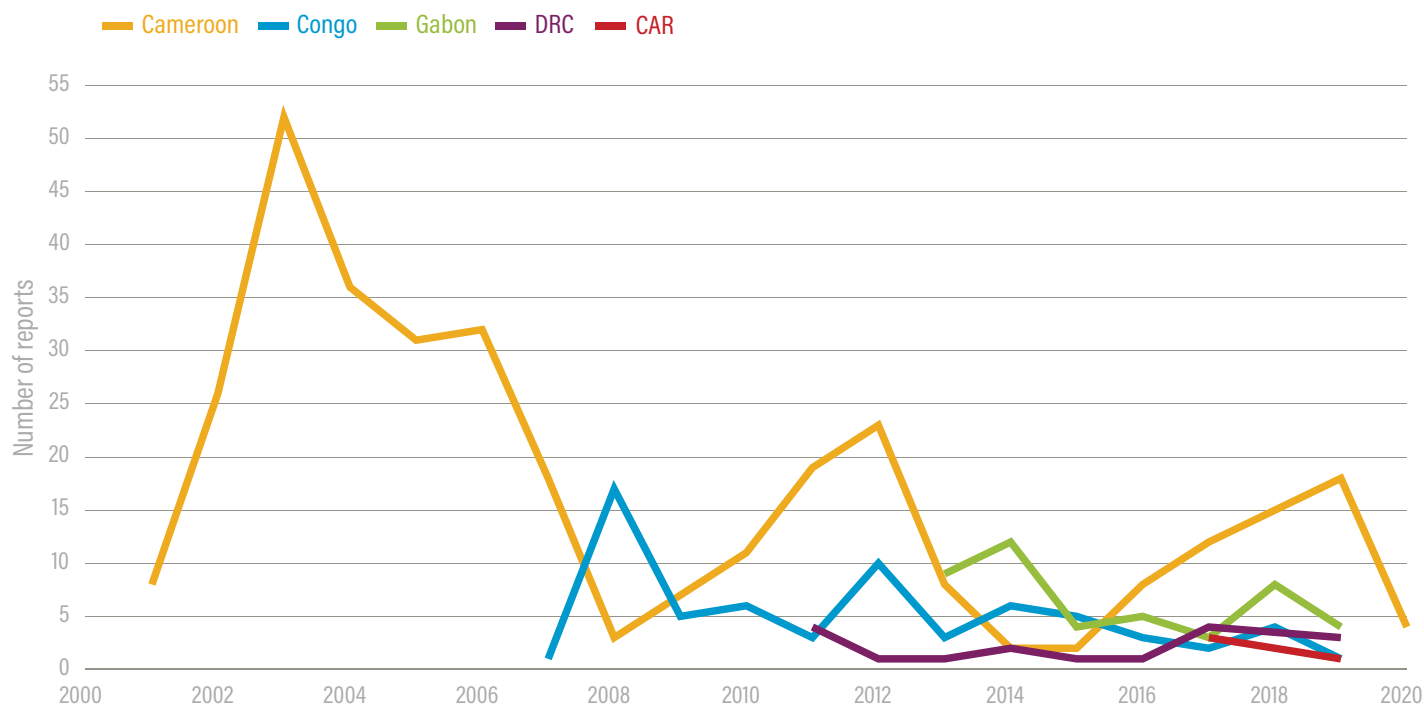
Overall, more reports were published in the early years of IFM, when fewer IFM organizations were active and fewer countries covered. The number of reports published depends on the number of missions and varies depending on funding received by IFM organizations, and other factors such as the presence or absence of political obstacles in various countries. Figures 6 and 7 show that the missions organized between 2001 and 2020 were not equally spread across the Congo Basin.

Cameroon, where IFM began, is also the country that had the highest number of IFM missions completed from 2001 to 2020. The proportion of forest titles covered by IFM missions in Cameroon varied over time (Figures 8 and 9). Although these data were not available for other countries, we could access the total number of forest titles in Cameroon for years 2007 to 2020. The following graphs show the proportion of active forest management units (FMUs) and active sales of standing volume visited as part of IFM missions between 2007 and 2020. FMUs and sales of standing volume are two types of forest titles that exist in Cameroon; others include community forests, communal forests, and small titles.

Between 2007 and 2013, mandated IFM organizations visited an average of 14 percent of active FMUs per year in Cameroon. Mandated IFM in Cameroon came to a halt in 2013. Between 2015 and 2020, external IFM organizations visited an average of 2.5 percent of active FMUs per year (Figure 8). These figures are not surprising as it is more difficult to access forest titles without an official mandate.

Between 2007 and 2012, the proportion of sales of standing volume covered by IFM missions varied between 0 percent in 2008, 2009, and 2016 and 61 percent in 2012 (Figure 9).

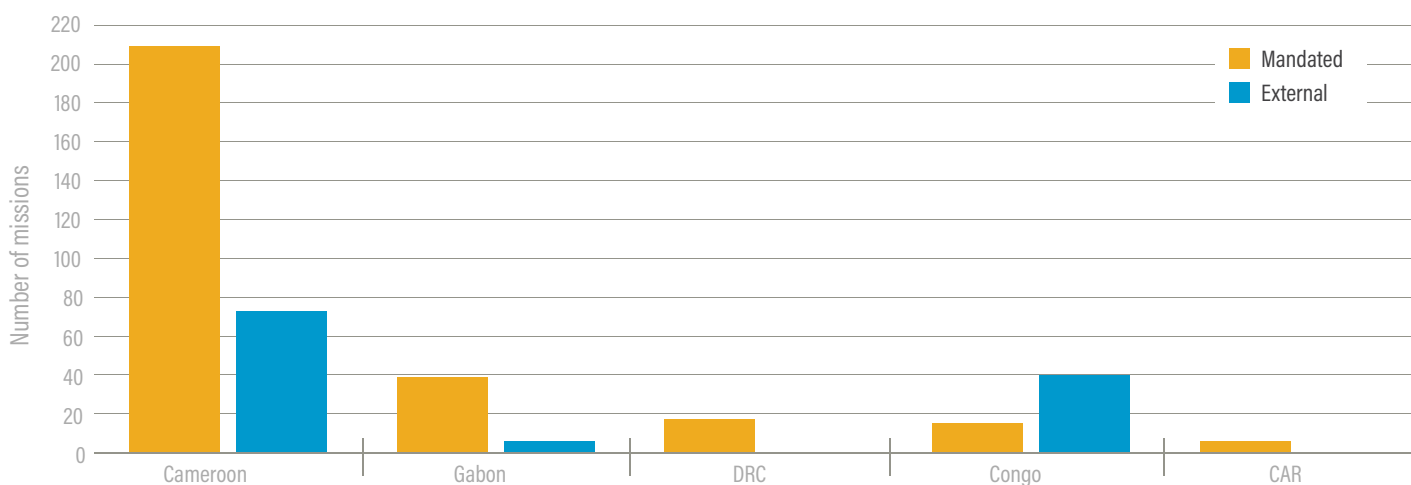
Figure 6 | Number of IFM Reports Published by Year and Country, 2001-2020



Note: Abbreviations: IFM = independent forest monitoring; Congo = Republic of the Congo; CAR = Central African Republic; DRC = Democratic Republic of the Congo; Congo = Republic of the Congo; REM = Resource Extraction Monitoring; FODER = Forêts et Développement Rural; CAGDF = Cercle d'Appui à la Gestion Durable des Forêts; OGF = Observatoire de la Gouvernance Forestière; CIEDD = Centre pour l'Information Environnementale et le Développement Durable.

Source: Based on raw data for years 2001-2020 from Global Witness, REM, AGRECO, FODER, CAGDF, OGF, CIEDD, Conservation Justice, and Brainforest, and modified/aggregated by the Field Legality Advisory Group (FLAG).

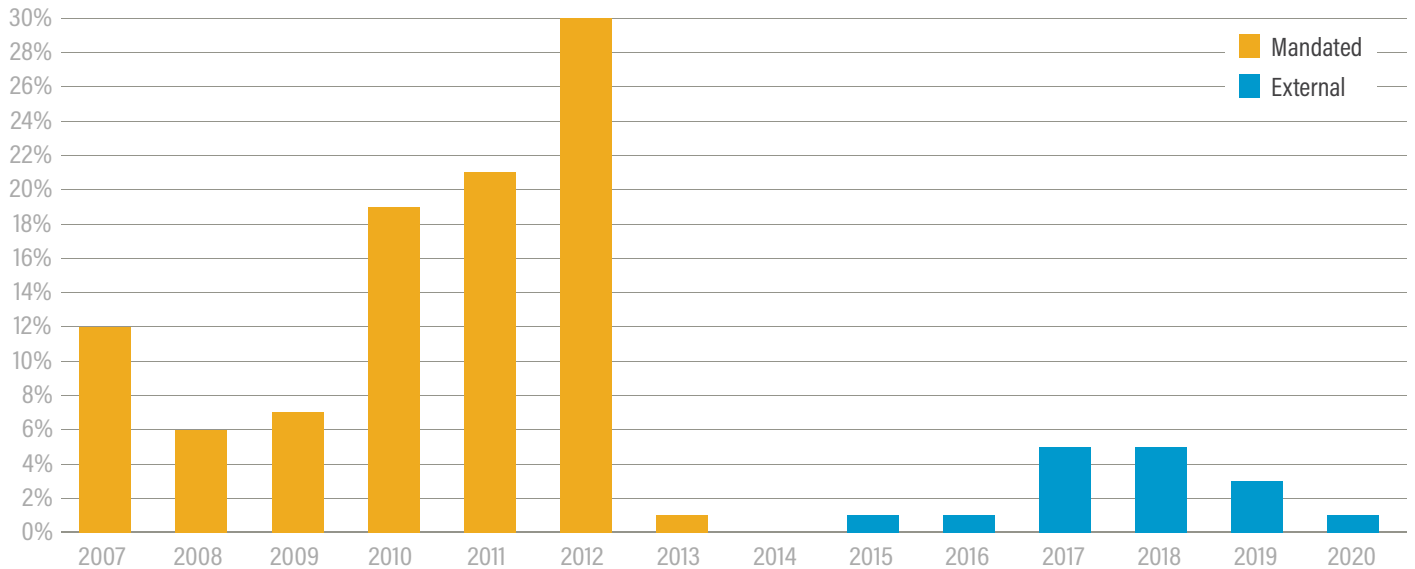
Figure 7 | Number of Missions from 2001 to 2020, by Country and IFM Type



Note: Abbreviations: DRC = Democratic Republic of the Congo; Congo = Republic of the Congo; CAR = Central African Republic; REM = Resource Extraction Monitoring; FODER = Forêts et Développement Rural; CAGDF = Cercle d'Appui à la Gestion Durable des Forêts; OGF = Observatoire de la Gouvernance Forestière; CIEDD = Centre pour l'Information Environnementale et le Développement Durable.

Source: Based on raw data for years 2001-2020 from Global Witness, REM, AGRECO, FODER, CAGDF, OGF, CIEDD, Conservation Justice, and Brainforest, and modified/aggregated by the Field Legality Advisory Group (FLAG).

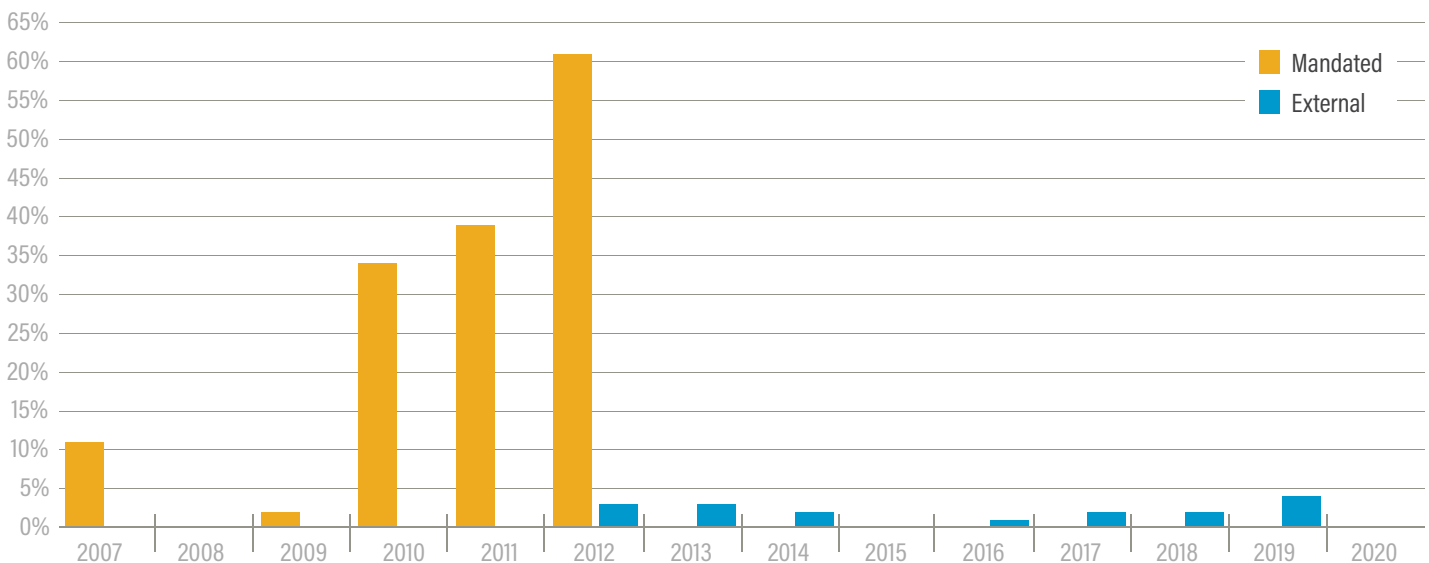
**Figure 8 | Proportion of Active Forest Management Units Visited as Part of IFM Missions between 2007 and 2020 in Cameroon**



Note: Abbreviation: IFM = independent forest monitoring.

Source: Based on MINFOF and WRI (2017) as well as raw data for years 2001–2020 from Global Witness, Centre pour le Développement Local Alternatif (CEDLA), Ecosystèmes et Développement (ECODEV), Programme d'Appui à l'Élevage et de Préservation de la Biodiversité autour des Aires Protégées au Cameroun (PAPEL), Resource Extraction Monitoring (REM), AGRECO, and Forêts et Développement Rural (FODER), modified/aggregated by the Field Legality Advisory Group (FLAG) and World Resources Institute.

**Figure 9 | Proportion of Active Sales of Standing Volume (Ventes de Coupes) Visited as Part of IFM Missions between 2007 and 2020 in Cameroon**



Note: Abbreviation: IFM = independent forest monitoring.

Source: Based on MINFOF and WRI (2017) as well as raw data for years 2001–2020 from Global Witness, Centre pour le Développement Local Alternatif (CEDLA), Ecosystèmes et Développement (ECODEV), Programme d'Appui à l'Élevage et de Préservation de la Biodiversité autour des Aires Protégées au Cameroun (PAPEL), Resource Extraction Monitoring (REM), AGRECO, and Forêts et Développement Rural (FODER), modified/aggregated by the Field Legality Advisory Group (FLAG) and World Resources Institute.

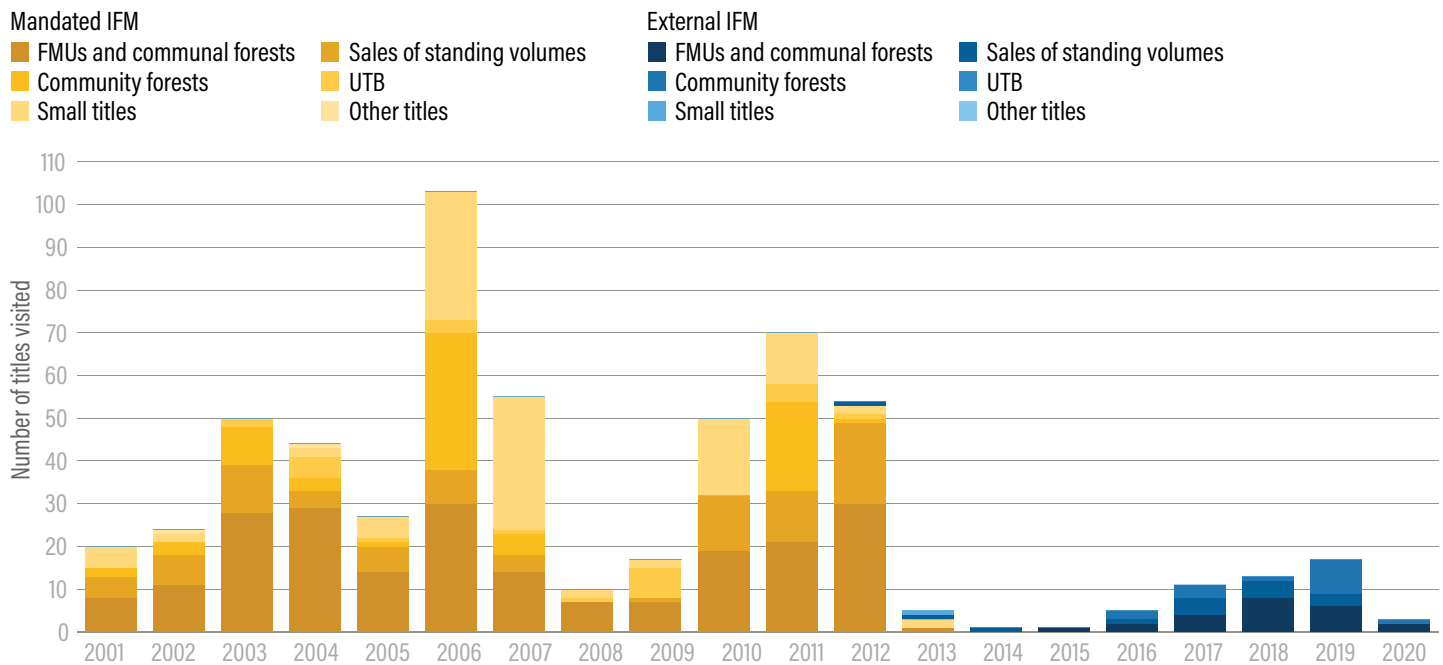
Overall, more titles were visited in Cameroon before 2013, when IFM was carried out by mandated IFM organizations (Figure 10). From 2017 to 2020, the EU-funded project Citizen Voices for Change amplified external IFM in Cameroon, increasing the coverage of forest titles by IFM. However, the proportion of forest titles visited by IFM organizations dropped in 2020 due to the end of the project and start of the COVID-19 pandemic (Figure 10).

To our knowledge, this is the first time that an analysis has been conducted of IFM activities over the past 20 years in the Congo Basin. While this study is not exhaustive, it shows that the ability of IFM organizations to monitor a significant share of forest titles in Cameroon has varied by forest type and over time due to changes in the conditions for IFM. An important takeaway is the difficulty in

accessing the number of forest titles of each type in the various countries for each year. Accessing IFM reports was easier but required an extensive compilation effort that was extremely time consuming. Therefore, a streamlined process is needed to regularly record and compile the content of IFM reports and the number of forest titles for each forest type in each country.

Summarizing accomplishments of IFM requires doing more than looking only at the number of missions or the percentage of forest titles covered. Understanding the key outcomes achieved by IFM organizations is equally important, especially in a context where IFM organizations produce reports based on data analysis in addition to missions.

Figure 10 | Number of Forest Titles Visited by Mandated and External IFM Organizations between 2001 and 2013 in Cameroon



Notes: The category "other titles" represents forest reserves. The category "small titles" includes timber recovery authorizations (autorisation de récupération de bois; ARB), timber removal authorization (autorisation d'enlèvement de bois; AEB), special timber removal authorization (autorisation spéciale d'enlèvement de bois; ASEB), rescue cut (coupe de sauvetage; CS), operating timber license (permis d'exploitation de bois d'œuvre; PEBO), salvage cutting (coupe de récupération), and public auction sales certificates (certificats de ventes aux enchères publiques; CVEP). More information on how forest titles work in Cameroon can be found at <https://www.timbertradeportal.com/countries/cameroon/#legality-profile>. Abbreviations: IFM = independent forest monitoring; FMU = forest management unit; UTB is the French abbreviation for unité de transformation du bois, meaning a sawmill.

Source: Based on MINFOF and WRI (2017) as well as raw data for years 2001–2020 from Global Witness, Centre pour le Développement Local Alternatif (CEDLA), Ecosystèmes et Développement (ECODEV), Programme d'Appui à l'Élevage et de Préservation de la Biodiversité autour des Aires Protégées au Cameroun (PAPEL), Resource Extraction Monitoring (REM), AGRECO, and Forêts et Développement Rural (FODER), modified/aggregated by the Field Legality Advisory Group (FLAG) and World Resources Institute.

## 2.5 Examples of IFM Outcomes

Since 2000, IFM organizations have achieved major outcomes in the Congo Basin (CIDT 2021; FAO 2021). While the purpose of this section is not to list them all, the examples here illustrate the types of outcomes achieved:

- In the DRC, Ministerial Order 072/CAB/MIN/EDD/ORCE/00/AAN/2018 was adopted on November 12, 2018, building on several observations from Observatoire de la Gouvernance Forestière (OGF). This order clarified and improved implementation rules for the social agreements established between logging companies and local communities. The order helped protect the communities' socioeconomic rights and ensure that they receive the revenues and infrastructures they are entitled to.
- In the DRC, forest concession contracts breaching the moratorium<sup>14</sup> were withdrawn. IFM information compiled led to an audit of the attribution process of these titles by the Inspectorate General of Finance at the request of the prime minister and to a forthcoming EU-funded legal review.
- In Cameroon, the results of mandated IFM led the ministry to suspend the activities of the company Société Forestière Hazim in 2000, and to fine the company nearly four million euros in 2002 (Greenpeace 2015).
- In Cameroon, CIDT and FODER (2021) reported that “between 2019 and 2020, authorities responded to 76 per cent of SNOIE denunciations. IFM reports have led to timber seizures, temporary suspensions of logging permits, the opening of legal proceedings against companies for unauthorized logging, formal notices for illegal logging of communal forests—even sanctions against MINFOF [Ministry of Forests and Wildlife] agents that were complicit in illegal logging activities.” Furthermore, external IFM organizations joined forces and advocated for the improvement of legality in the domestic market leading to the signature on December 15, 2020, of a ministerial order<sup>15</sup> to regulate the use of legal wood in public procurement (CIDT 2021). Overall, external IFM activities contributed to the collection by MINFOF of approximately \$125,000 in fees and taxes between 2016 and 2019 (CIDT 2019).
- In CAR, IFM organizations helped establish a platform that includes representatives of government agencies, the police, and the cabinets of the prime

minister and the president. This platform focuses on tackling environmental crime related to forests and fauna. The IFM organization CIEDD helped train platform members on forest laws and the efforts required to pursue forest crimes (CIDT 2021).

- The IFM work of Conservation Justice, a Gabonese NGO, triggered 15 arrests during the ALEFI project (Infos Gabon 2019).

These significant outcomes were achieved despite many challenges that are detailed in the next section.

## 3. WHAT HAVE BEEN THE MAIN CHALLENGES FOR INDEPENDENT FOREST MONITORS IN THE CONGO BASIN?

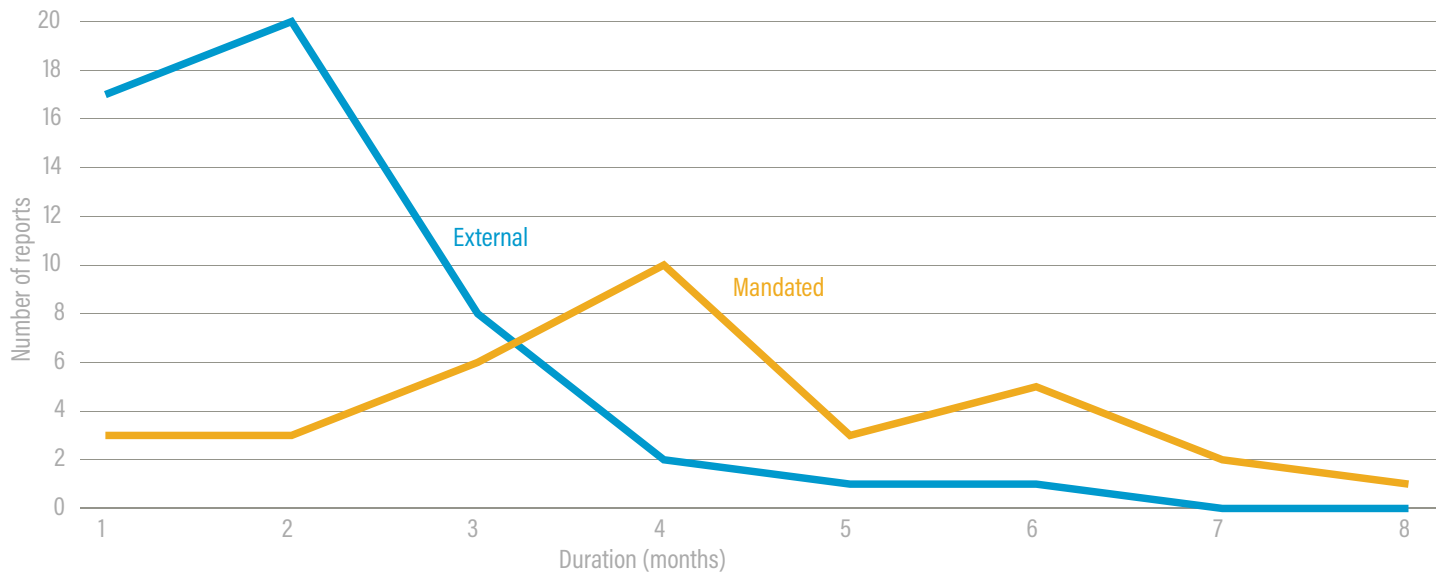
Publication delays for mandated IFM organization mission reports due to political resistance

Governments rarely request the initiation or expansion of IFM activities. IFM is often an initiative of NGOs, civil society, and/or international donors, leading to some resistance to IFM by government agencies. Resistance materializes in different ways, such as regulations preventing IFM organizations from traveling to field sites or delays in authorizing forest visits. As mandated IFM organizations attempt to work more closely with the Ministry of Forests, resistance manifests in other ways, including protracted MoU negotiations and, once an MoU is signed, delays in organizing the reading committee meetings that are mandatory for approving IFM reports prior to publication.

FLAG analyzed the time spans between missions and report publication for a sample of 142 IFM mission reports produced between 2001 and 2020 that included both the date of the mission and the date of the report publication (Figure 11).

According to this analysis, 66 percent of the reports produced by mandated IFM organizations were published no more than four months after the mission. However, for 24 percent of the reports, this time span expanded to six months or more due to a combination of factors: the time IFM organizations needed to analyze data and produce the report; and the time required for the approval process, which includes the Ministry of Forests for mandated IFM organizations. One factor delaying report publication is

Figure 11 | Distribution of the Number of Published Reports by Time Span and Type of IFM Organization



Note: Abbreviation: IFM = independent forest monitoring.

Source: Based on raw data for years 2001–2020 from Global Witness, Resource Extraction Monitoring (REM), AGRECO, Forêts et Développement Rural (FODER), Cercle d'Appui à la Gestion Durable des Forêts (CAGDF), Observatoire de la Gouvernance Forestière (OGF), Centre pour l'Information Environnementale et le Développement Durable (CIEDD), Conservation Justice, and Brainforest, modified/aggregated by the Field Legality Advisory Group (FLAG).

political resistance to IFM. External IFM organizations usually do not have mandatory reading committees that include the Ministry of Forests. As a result, they are less likely to suffer from political resistance delaying the publication of their mission reports. Indeed, FLAG found that 96 percent of external IFM organization reports were published within four months.

Another consequence of political resistance is the lack of political will to act on recommendations from IFM organizations.

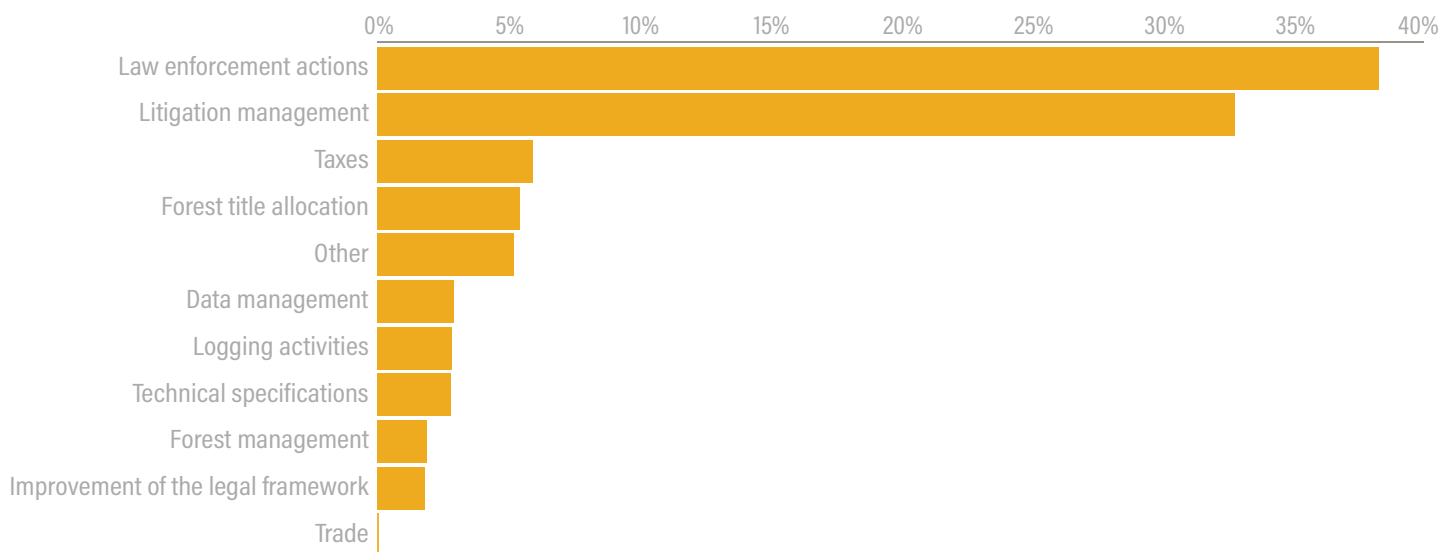
#### Limited governmental uptake of IFM conclusions due to political resistance

For IFM activities to have impact, government agencies must address the issues that monitors identify. FLAG experts compiled all of the recommendations listed in the 469 IFM reports that they analyzed and grouped them into 11 categories following the methodology described in Section 2 (Figure 12). The grouping of recommendations into categories was based on observations described in the reports.

Sixty-seven percent of recommendations written by IFM organizations in the reports analyzed by FLAG included recommendations for law enforcement actions and litigation management, which are both essential for efficient law enforcement. Existing literature confirms that improving practices on these two topics requires strong and sustained political will (EFI 2021; Mbazibain and Tchoudjen 2021; REM n.d.; REM 2012) and financial resources that governments often lack. IFM organizations have severely limited leverage to promote changes in these areas.

While the IFM reports analyzed by FLAG did mention actions taken by the government or logging companies in response to the recommendations, only 8 percent of the recommendations listed in the reports included a mention of this type of action. There are several reasons for this. This figure does not capture all the measures, either because measures were taken after the reports were published, or measures were not reported. However, this figure gives an indication of the limited uptake of IFM recommendations by government agencies between one to eight months following IFM missions.

Figure 12 | **Percentage of Recommendations by Category in the 469 Reports Analyzed by FLAG**



Source: Based on raw data for years 2001–2020 from Global Witness, Resource Extraction Monitoring (REM), AGRECO, Forêts et Développement Rural (FODER), Cercle d'Appui à la Gestion Durable des Forêts (CAGDF), Observatoire de la Gouvernance Forestière (OGF), Centre pour l'Information Environnementale et le Développement Durable (CIEDD), Conservation Justice, and Brainforest, modified/aggregated by the Field Legality Advisory Group (FLAG).

In addition, when enforcement cases are open, the sanctions do not always reflect the severity of the infraction. In Gabon, Conservation Justice organized IFM missions during the ALEFI project and tracked the measures taken by government agencies afterwards. They tracked 25 arrests, including 15 that were directly initiated as a result of the project. Of the 25 arrests, 9 led to opening a case, resulting in mild sanctions compared with the damages caused and severity of the infractions (Infos Gabon 2019).

#### Conflict of interest that exacerbates political resistance

IFM organizations also track corruption, which can trigger resistance from corrupt individuals within governments. In several instances, IFM organizations complained that they were urged to keep reports confidential to protect their organizations and employees from retaliation measures, preventing them from effectively highlighting corruption in their respective countries.

#### Limited collaboration between Ministries of Forests and Ministries of Justice on forest infractions

In the Congo Basin countries, three major barriers undermine the ability of the judicial system to act on IFM findings. First, the forest laws of most Congo Basin countries do not provide mechanisms for referral or self-referral to the courts. Second, interactions between the Ministry of Forests and the Ministry of Justice are at times limited, preventing a meaningful exchange of information about cases. Without this, recommendations made by an IFM organization and/or the Ministry of Forests are unlikely to lead to any judicial action. In addition, few magistrates are familiar with the severity of forest crimes and their impact on biodiversity. Therefore, the Ministry of Justice has difficulty handling forest infractions and crimes with the attention they require. The third barrier is related to the way infractions are handled by the Ministry of Forests. Most infractions lead to a “transaction,” an option for the offender (the company or its representative) to agree to a contractual arrangement with the other parties instead of going to court (Nguiffo et al. 2021). A transaction prevents judges from getting involved in the process, therefore protecting the offender from severe sanctions, such as imprisonment, that can be decided



only by a judge. The negotiations taking place during a transaction are not public and often let the offender get away with a negotiated amount that is not commensurate with the infraction.

### Difficulties with accessing information

To monitor forest-related activities, IFM organizations need to access information from the Ministry of Forests or other government agencies (e.g., finance, customs, harbors), as well as documentation from logging companies. However, government agencies and logging companies have no incentive to share their documentation with IFM organizations. On the contrary, logging companies guilty of infractions have an incentive not to share their documentation to hide their wrongdoing. In addition, the information is not centralized. Key compliance documents are spread among the ministry, in the capital city, and local government agencies in different provinces and across company headquarters and field sites. Gathering relevant compliance documentation to monitor a given forest is a major challenge.

### Developing and maintaining IFM credibility

When IFM organizations publish a report highlighting potential infractions and law enforcement issues, the logging companies and/or government agencies targeted are very likely to fight back, claiming the statements published are false. Therefore, IFM organizations cannot afford to be wrong. Their success in improving law enforcement and forest governance depends on their ability to consistently produce credible data (Mbzibain and Tchoudjen 2021). Any mistake or incorrect statement from IFM organizations can ruin years of effort to develop and maintain their credibility. Maintaining IFM credibility becomes even more challenging as more local CSOs with low capacity start developing IFM activities.

### Lack of sustainable funding

As described in Section 1, IFM organizations are typically funded through short-term projects, thereby creating financial insecurity and undermining their ability to develop and implement long-term strategies and to ensure job stability for their employees. Operating capacity is also significantly affected as a great deal of time and energy is needed for fundraising efforts.

### Lack of visibility to influence the market

Few importers are aware that IFM organizations produce reports that could help them mitigate their risk of buying illegal timber. Even when importers are aware of IFM reports, they generally prefer to rely on their own investigations and audits, and rarely review IFM observations prior to conducting field visits. Importers also report being uncertain about how to use IFM recommendations.<sup>16</sup> They claim that IFM data are difficult to locate and use as they are complex, rarely available in English, lack standardization, and do not correspond to their specific needs. Importers also perceive that IFM organizations have the same agenda as environmental NGOs, and therefore lack objectivity (Pillet 2018). In addition, some importers view IFM data as lacking tangible evidence, such as official documentation.<sup>17</sup>

To address these challenges, IFM organizations, donors, and decision-makers in the Congo Basin and other regions can implement a variety of proposed solutions.

## 4. WHAT ARE THE SOLUTIONS GOING FORWARD?

### Institutionalize IFM by incorporating it into national laws and international regulations

Policymakers should include an official role for IFM organizations in national laws, as well as in international supply-side and demand-side regulations. The new forest law of the Republic of the Congo, for instance, refers to IFM. Donors should encourage policymakers to adopt such reforms.

### Adopt quality standards

The credibility of IFM organizations depends on the quality of their reports. Therefore, IFM organizations should invest in quality control and quality assurance systems, and donors should more systematically include quality requirements in IFM grants.

In addition, IFM data from different organizations need to be combined and analyzed to identify national and regional trends in illegal logging. The need to standardize IFM data grows as the number of CSOs involved in IFM increases. Therefore, adopting similar quality standards is crucial for IFM organizations operating in the same region.

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Several initiatives emerged recently that can be built upon, such as SNOIE in Cameroon. Further, in 2019, WRI launched the Open Timber Portal in consultation with government, the private sector, and civil society actors<sup>18</sup> and established standardized IFM data entry forms and quality control processes for IFM data uploaded to the portal. In addition, IFM organizations FLAG and OGF have developed quality control tools to review IFM reports. Their tools can be used internally and on reports written by their IFM peers. Institutionalizing peer reviews for IFM reports is a promising solution to further pursue.

### Build an international community of practice for IFM

Increased communication and experience-sharing among IFM organizations would help improve coordination and standardization of IFM, while supporting better information-sharing to tackle transnational infractions. This is one reason why eight IFM organizations from Central and West Africa created the Independent Monitoring African Platform (PA-OI) in 2014. The objective of this platform is to “promote a more professional, credible and efficient IFM, by harmonizing IFM methodologies and strategies” (PA-OI 2019). This is also why some donors, such as the United Kingdom’s Foreign, Commonwealth & Development Office, organize coordination meetings promoting exchanges and sharing experiences among their grantees involved in IFM.

### Set up subnational IFM networks

Subnational IFM networks help improve cost-efficiency. Indeed, the model of a single national IFM organization based in the capital city carrying out missions in different regions creates higher costs than a decentralized approach. For instance, one mission in the DRC carried out by the IFM organization OGF based in Kinshasa costs about \$20,000. OGF led the development of RENOI, a network of provincial IFM organizations. When OGF experts detect issues in a remote province, they can contact the closest IFM organization to initiate an investigation, thereby improving the cost-efficiency of IFM in the DRC.

In addition, advocating as a network is more impactful than advocating as a single organization. For instance, RENOI held a press conference in Kinshasa on April 9, 2019, to draw the attention of both national and international stakeholders to forest management issues in Equateur Province, leading to a joint mission between OGF and inspectors from the ministry.

### Enable access to information

Access to information is a challenge for IFM organizations (see Section 3). To address this issue, IFM organizations can advocate for governments that signed VPAs to comply with the Transparency Annex of the VPA by making the information listed in the annex public. In addition, IFM organizations that sign an MoU with the government can negotiate a clause granting them access to information from ministries. Furthermore, IFM organizations can be trained on how to use free tools like the Open Timber Portal (OTP),<sup>19</sup> which centralizes relevant information from multiple sources, including government agencies and companies. Developing subnational IFM networks with local CSOs is also a solution to accessing documentation stored at local government agencies. Over the longer term, IFM organizations can advocate for increased transparency of the forest sector, making more documents publicly available.

### Negotiate effective MoUs

The details of the MoUs that some IFM organizations sign with a government are key because they define the way the entities will interact (Mbzibain and Tchoudjen 2021). Table 2 presents an analysis of specifications from 11 agreements (terms of reference, MoUs, ministerial orders, protocols of agreement, and contractual obligations) signed by seven IFM organizations from five countries between 2001 and 2017. The wording varied across document types with some documents being more binding than others (e.g., ministerial orders versus terms of reference). The content of the specifications is detailed in Table 2. The rights granted to IFM organizations depend on the government’s willingness to grant them these rights.

Table 2 | Analysis of Specifications from 11 Agreements Signed by IFM Organizations between 2001 and 2017

RIGHTS OF IFM ORGANIZATIONS SPECIFIED IN MOU/PROTOCOL/DECREES	CAMEROON			CONGO		DRC		CAR	GABON	IDEAL MOU
	GW	REM	AGRECO	REM	CAGDF	REM	OGF	CIEDD	CJ	
<b>MISSIONS/FOREST INFRACTIONS</b>										
Access to forest exploitation documents										
Permanent Mission Order granting forest access (versus order granted on request per mission)										
Selection of mission representative for majority of or all forest sector titles									*	
Proposed extraordinary joint mission with ministry										
Possibility to join ministry enforcement										
Independent investigations without prior ministry approval or participation										
Reading committee for publication of mission reports										
Maximum timeline for approving publication of the mission report										
<b>LAW ENFORCEMENT ANALYSES AND SUPPORT</b>										
Access to law enforcement processes										
Infraction follow up (access to documents and participation in meetings)										
Publication of thematic analyses without ministry comments provided it approved related investigation reports										
Maximum timeline for ministry comments before automatic publication (thematic analyses)										
Technical support to ministry (enforcement and legislative tools)										
FLEGT activities (support texts, information, tools) and civil society training activities										
Financial support to ministry										*

	Yes
	Not mentioned, mentioned but not confirmed, unclear, or partial. This does not equate to lack of right
	No

Notes: \* No, or yes with caveats (e.g., dysfunctional fund in the DRC) or if clear impact on enforcement and action taken. Abbreviations: IFM = independent forest monitoring; Congo = Republic of the Congo; DRC = Democratic Republic of the Congo; CAR = Central African Republic; MoU = memorandum of understanding; GW = Global Witness; REM = Resource Extraction Monitoring; CAGDF = Cercle d'Appui à la Gestion Durable des Forêts; OGF = Observatoire de la Gouvernance Forestière; CIEDD = Centre pour l'Information Environnementale et le Développement Durable; CJ = Conservation Justice; FLEGT = Forest Law Enforcement, Governance and Trade.

Source: REM author.

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However, IFM organizations are more likely to be granted additional rights if they begin negotiations knowing exactly what they want to achieve. Ideally, MoUs should include all the clauses listed in the table, except potentially the one listed in the last row: financial support to the ministry. IFM organizations can use this list as a starting point for the negotiation or renegotiation of their MoUs.

### Purposefully select technologies

Remote sensing technologies now provide information in near real time and are freely available on smartphones via apps such as Forest Watcher,<sup>20</sup> ForestLink,<sup>21</sup> and FLEGT Watch.<sup>22</sup> These tools allow IFM organizations to initiate missions whenever a major deforestation event is detected. Other technologies like drones can support field missions. In addition, emerging technologies like those for wood identification and blockchain could support supply chain investigation in the future. IFM organizations should be trained on available technologies and how to purposefully select the right technology and data sources to answer specific questions.

### Invest time in working with other ministries in addition to the Ministry of Forests

Expanding engagement with other ministries can be an efficient way to address political resistance from the Ministry of Forests. For instance, IFM missions identifying massive tax fraud are relevant to the Ministry of Finance or other ministries whose budgets depend on tax collection. Leveraging the power dynamics among ministries within the same government can also help overcome political resistance from the Ministry of Forests.

### Invest time in communicating results to a broader international audience

IFM reports in the Congo Basin are typically published only in French and circulated only to key in-country stakeholders and to the government. Several options exist for IFM organizations to reach a broader international audience and create international pressure to act on IFM findings. First, IFM organizations can translate their reports into English. In Cameroon, for instance, FODER recently published several reports in different languages. IFM organizations can upload the observations they collected to the OTP, which is available in English, French, Chinese, Japanese, Korean, and Vietnamese, and used by an international audience. Another strategic option is

for IFM organizations to partner with an international NGO to publish a report that draws media attention. In Cameroon, the IFM organization Centre for Environment and Development (CED) partnered with the well-known NGO Environmental Investigation Agency to publish the report *Tarnished Timber, Tarnished Temples* in 2020 (EIA and CED 2020). International NGOs are also in a better position to publish findings, such as corruption issues, that would be too sensitive and too risky for IFM organizations to publish in their own countries.

### Improve the utility of IFM data to implement and enforce demand-side measures

Demand-side policies, such as Korea's Act on the Sustainable Use of Timbers, Japan's Clean Wood Act, the Australia Illegal Logging Prohibition Act, the EU and the UK Timber Regulations, and the U.S. Lacey Act, require wood importers to ensure they buy only legal wood. This process is called due diligence. IFM primarily focuses on field visits, while demand-side policies also require importers to analyze documentation. A stronger focus on official compliance documentation in addition to field work would make IFM data more attractive to importers. IFM organizations should conduct more document-based investigations and produce more observations on the validity of official documents based, for instance, on the documents available on the OTP.<sup>23</sup> Document-based investigations not only produce observations that are readily applicable to demand-side risk assessments but also increase IFM efficiency as they assist IFM organizations in better targeting their field missions. In the meantime, IFM organizations should develop partnerships with timber trade federations and competent authorities in charge of enforcing demand-side measures.

### Gather more data outside forests

Investigating areas where timber is stored, such as ports and log yards, allows IFM organizations to make observations that involve large volumes of timber that are difficult for national enforcement agents and importers to ignore. In addition, IFM organizations should invest more time in documenting easy-to-detect, widespread illegalities such as daily breaches of log export quotas, common throughout much of the Congo Basin, and a systemic lack of management plans, as recently reported by an IFM organization in the Ivory Coast (Mullely 2020).

## Invest in monitoring and evaluation, using regionally standardized sets of indicators

Instituting well-designed monitoring and evaluation (M&E) is imperative to ensure that IFM organizations continuously improve, demonstrate effectiveness, and are accountable toward donors. The analyses presented in Sections 2 and 3 should be produced more frequently, ideally yearly, based on a set of standardized indicators. WRI is currently designing standardized indicators and dashboards to support the development of a regional M&E approach, which will highlight the main trends in illegal logging in the Congo Basin to support the advocacy efforts of IFM organizations. This approach will give IFM organizations, producer country governments, and donors the ability to assess the evolution of compliance and law enforcement in the region, and to adapt their strategies accordingly. Donors funding IFM should require IFM to feed data into this regional M&E dashboard.

## Mobilize long-term funding for IFM

Donors should consider investing in longer-term partnerships with IFM organizations, either individually or through platforms such as the PA-OI, similar to the approach adopted for the IFM fund setup in Indonesia.<sup>24</sup> Donors could also reduce the time spent by IFM organizations in fundraising and reporting by coordinating strategies and adopting the same funding approach using the same funding mechanism.

## Maintain investment in capacity building for IFM organizations and importers

Donors should continue to invest in training new CSOs and strengthening the capacity of existing IFM organizations on quality and standardization. However, we recommend adopting new formats such as ongoing coaching and training in the field as opposed to traditional workshops.

Importers should be trained on where to find IFM data and how to use them in their due diligence systems. In addition, donors could invest in developing more direct communication among importers and IFM organizations. For instance, additional exchanges with IFM organizations are necessary to clarify data and advise importers about how to mitigate the risk of purchasing illegal wood from a given timber producer. Importers would benefit from contacting IFM organizations to ask for background

information about a specific company or area, inquire and seek guidance about a document, and plan field visits in the forests managed by their suppliers. IFM organizations could also help train importers on how to assess the validity of the compliance documents provided by timber producers for specific countries.<sup>25</sup>

## 5. CONCLUSION

Since 2000, the IFM concept has evolved as IFM organizations have innovated to address challenges. We recommend that IFM organizations and donors continue working together, along with other stakeholders, to further improve IFM as the concept expands to new regions and there are opportunities to extend IFM to other commodities. Whether IFM focuses on timber or other commodities, takes place in the Congo Basin or in any other region, standardization of IFM data through the adoption of quality standards, development of an IFM community of practice, and establishment of subnational IFM networks are paramount. Developing long-term funding solutions tied to a streamlined M&E approach is necessary for IFM in the Congo Basin today and will be equally important as IFM expands to other regions and commodities. Finally, the best asset to ensure that IFM organizations have a role in implementing future regulations on commodities is to increase the use of IFM data in implementing current regulations. Therefore, new forms of capacity building, through ongoing coaching and field visits, are urgently needed to further train IFM organizations in producing data that are more actionable for enforcing demand-side regulations. In the meantime, donors, international NGOs, and IFM organizations should also work more closely with importers and enforcement agencies in consumer countries to officially integrate IFM data as an official source of information in due diligence processes.

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## ENDNOTES

1. Including but not limited to Brainforest founded in 1998 in Gabon, the Centre for Environment and Development (CED) founded in 1994 in Cameroon, the Congolese Observatory of Human Rights (Observatoire Congolais des Droits de l'Homme; OCDH) founded in 1994 in Congo, and the Action Group to Save Humankind and Its Environment (Groupe d'Action pour Sauver l'Homme et son Environnement; GASHE) founded in 1999 in the DRC.
2. See Section 4 for more details on MoUs.
3. See Figures 4 and 5 for more details on mandated IFM.
4. Global Witness campaigns and press releases on oil in the Republic of the Congo (Global Witness 2005), on oil and diamonds in neighboring countries (Global Witness 2003a), and on diamonds (Global Witness 2003b) led to tensions within the Cameroon IFM project on several occasions, with regular accusations from the Cameroonian government that it was being spied on, leading to threats of project cancellation.
5. See Section 1.3.
6. REDD+ stands for Reducing Emissions from Deforestation and Forest Degradation. For more information, see <https://redd.unfccc.int/>.
7. See Figure 12 for more information about the types of recommendations proposed by IFM organizations.
8. FLAG is a Cameroonian association promoting transparency and legality in the management of natural resources in the Congo Basin and beyond. For more information, see <http://flag-cmr.org/>.
9. For more information about the Open Timber Portal, see [www.opentimberportal.org](http://www.opentimberportal.org).
10. A forest title grants the beneficiary ownership and/or use rights within the boundaries of the area covered by the title.
11. Infractions may have different names in different countries, so FLAG developed categories to facilitate comparisons. The categories are based on the key characteristics of the different offenses as described in the laws of the different countries. Observations were grouped into categories based on the facts described in the reports.
12. Recommendation focus areas were identified based on the nature of the problem that the recommendation was intended to address and with reference to the major stages of the forest resource management cycle and the supply chain.
13. Reports not analyzed by FLAG include investigation reports on the timber supply chain, annual analysis reports, quarterly analysis reports, quarterly briefing notes, legislative analyses, and thematic analysis reports, all of which included analyses and recommendations on legislation gaps, follow-ups on infractions, sanctions, infraction trends, mission coverage, and law enforcement capacity building.
14. See Rainforest Foundation Norway, Rainforest Foundation UK, Global Witness, Greenpeace, and Dynamique des Groupes des Peuples Autochtones. n.d. "DRC Government Reinstates Illegal Logging Concessions in Breach of Its Own Moratorium." <https://www.rainforestfoundationuk.org/media.ashx/drc-moratorium-reinstated-20-february-2018.pdf>. Accessed October 2021.
15. Joint order n°0162/MINFOF/MINTP/MINMAP.
16. Interview with an importer, London, October 2020; interview with a timber trade federation, London, October 2020.
17. Interview led by REM with an importer in 2020.
18. For more information about the Open Timber Portal, see [www.opentimberportal.org](http://www.opentimberportal.org).
19. For more information about the Open Timber Portal, see [www.opentimberportal.org](http://www.opentimberportal.org).
20. For more information about Forest Watcher, see <https://forestwatcher.globalforestwatch.org/>.
21. For more information about ForestLink, see <https://www.rainforestfoundationuk.org/rtm>.
22. For more information about FLEGT Watch, see <https://cidt.org.uk/cv4c/flegtwatch/>.
23. For more information about the Open Timber Portal, see [www.opentimberportal.org](http://www.opentimberportal.org).
24. See [www.forestfund.or.id/en/](http://www.forestfund.or.id/en/) for information about the Independent Forest Monitoring Fund in Indonesia.
25. Interview led by REM with an importer in 2020.

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## ACKNOWLEDGMENTS

We are pleased to acknowledge our institutional strategic partners that provide core funding to WRI: the Netherlands Ministry of Foreign Affairs, Royal Danish Ministry of Foreign Affairs, and Swedish International Development Cooperation Agency.

The authors are very grateful to the IFM organizations FODER, OGF, Brainforest, CIEDD, CAGDF, and Conservation Justice for sharing and providing insight on their reports. The authors also thank Brad Mulley for his advice and expertise; Diane Bala for data compilation and analyses; and Teodyl Nkuintchua, Achille Djeagou, Justin Kamga, Zuraidah Said, Rod Taylor, Tina Schneider, Marc Vandenhoute, and Sarah Fumey for their thorough reviews and helpful comments.

Thank you also to Susan Vincent, Emily Matthews, Romain Warnault, Rosie Ettenheim, Shannon Collins, Sarah DeLucia, Renee Pineda, and Emilia Suarez for providing editing, design, and administrative support. This publication was produced with the financial support of the European Union, the UK Foreign, Commonwealth & Development Office, and the Norwegian Agency for Development Cooperation and do not necessarily reflect the views of the above-mentioned donors.

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CO-FUNDED BY THE EUROPEAN UNION



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## ABOUT REM

Resource Extraction Monitoring (REM) is a UK non-profit organization founded in 2003 and specialized in Mandated Independent Forest Monitoring. We have had offices in Cameroon, the Republic of the Congo, the Democratic Republic of Congo and worked in 13 other countries. Aside from our core work implementing the mandated IFM projects, we provide extensive training and support to forest law enforcement officials and CSOs in monitoring techniques and collection of reliable data. We develop tools in collaboration with governments, NGOs, or the private sector to improve forest law enforcement such as law and procedures manuals, infractions databases, and tracking systems. We are currently exploring how digital ledger technologies can support ecosystem restoration and conservation.



## ABOUT FLAG

Registered in Cameroon since September 2012, FLAG promotes the principles of good governance in natural resource management in the Congo Basin with a particular focus on legality and transparency. FLAG has solid expertise in the implementation of independent monitoring of natural resource management, which is shared through the training and coaching of state institutions and civil society organizations. FLAG is also working on the standardization of independent monitoring in the Congo Basin as a member and technical secretariat of the African Platform for Independent Monitoring (PA-OI).



## ABOUT WRI

World Resources Institute is a global research organization that turns big ideas into action at the nexus of environment, economic opportunity, and human well-being.

### Our Challenge

Natural resources are at the foundation of economic opportunity and human wellbeing. But today, we are depleting Earth's resources at rates that are not sustainable, endangering economies and people's lives. People depend on clean water, fertile land, healthy forests, and a stable climate. Livable cities and clean energy are essential for a sustainable planet. We must address these urgent, global challenges this decade.

### Our Vision

We envision an equitable and prosperous planet driven by the wise management of natural resources. We aspire to create a world where the actions of government, business, and communities combine to eliminate poverty and sustain the natural environment for all people.

### Our Approach

#### COUNT IT

We start with data. We conduct independent research and draw on the latest technology to develop new insights and recommendations. Our rigorous analysis identifies risks, unveils opportunities, and informs smart strategies. We focus our efforts on influential and emerging economies where the future of sustainability will be determined.

#### CHANGE IT

We use our research to influence government policies, business strategies, and civil society action. We test projects with communities, companies, and government agencies to build a strong evidence base. Then, we work with partners to deliver change on the ground that alleviates poverty and strengthens society. We hold ourselves accountable to ensure our outcomes will be bold and enduring.

#### SCALE IT

We don't think small. Once tested, we work with partners to adopt and expand our efforts regionally and globally. We engage with decision-makers to carry out our ideas and elevate our impact. We measure success through government and business actions that improve people's lives and sustain a healthy environment.



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