

EXECUTIVE SUMMARY

The fate of what are arguably the world's most valuable and coveted timber stockpiles will be discussed at the 74th meeting of the Standing Committee (SC74) of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). Madagascar is proposing a new approach, according to which the so-called "controlled" stockpile (~30,000 logs) will be exclusively used for domestic purposes, be possibly traded locally, and leave the island as items weighing less than 10 kilograms per shipment. It his approach and the current recommendations from the Secretariat were to be approved, they would fully remove the "controlled" stockpile from the oversight of the Convention. Under the current scenario, the critical precondition of verifying, inventorying and marking the "controlled" stockpiles before any use, which is an essential safeguard against large scale laundering, will be dropped.

This proposal is problematic on a number of levels, with evidence already available to illustrate the laundering avenues it allows that would now be outside the Convention's oversight. According to the Environmental Investigation Agency (EIA) and Transparency International (TI)'s investigation, the first implementation of the domestic approach - used for the renovation of the Queen's Palace - is plagued by opacity, lack of accountability, and irregularities.

Meanwhile, a suspected trafficker accused of being involved in the silencing of Malagasy environmental activists is promoted senator and vice-president of the senate by President Andry Rajoelina, who coincidentally was in power from 2009 to 2014 when the timber stockpile issue gained importance and timber barons consolidated their power on the island. In this context, the "very slow and insufficient progress regarding the governance aspects" noted by the Secretariat, is of utmost concern. As Madagascar is facing a series of terrible socio-economic crises, it is essential that any timber disposal process, being for alleged domestic use or international trade, strengthens governance and people's livelihoods - in particular transparency and accountability in the use of the forest resource - and not weaken them.

EIA and TI support the Secretariat's recommendations in SC74 Doc. 28.3.2 (a) and (b), raise utmost concern regarding (d) and (e), and particularly disagree with the Secretariat's interpretation of (d)iii. In order to avoid yet another rosewood trafficking crisis, EIA and TI recommend, inter alia: (1) the reliable verification, inventory, and marking of any stockpile before official use; (2) the securing of the "controlled" stocks, for instance by regrouping all logs in one location; (3) the establishment of an operational third-party independent monitor to accompany the stockpile disposal and use plan; (4) the creation of a corruption-free oversight body; (5) the implementation of a transparent disposal and revenue allocation process; and (6) the implementation of domestic supply chain traceability.

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MADAGASCAR'S NEWEST APPROACH

Most of existing Malagasy rosewood, ebonies, and palisanders stockpiles are located in Madagascar, where a total of approximately 2.26 million logs are stocked under various conditions (Figure 1 and Table 1). The rest of the stockpiles, roughly 49.4 thousand logs, are located in foreign countries, where illegal timber has been stopped and seized over the years.

PRE-PANDEMIC DISCUSSIONS

At the 16th meeting of the Conference of the Parties (CoP16) in 2013, the Malagasy populations of rosewood, ebonies, and palisanders (*Diospyros spp.* and *Dalbergia spp.*) were included on Appendix II with an annotation specifying that the listing applies to "logs, sawn wood and veneer sheets". In order to ensure effective implementation of the listing, an "Action Plan" was adopted at CoP16. The Plan included an embargo on the export of timber stockpiles of these species until the Standing Committee had approved the results of a stockpile audit and use plan to determine which part of the "declared" stockpile had been legally acquired and could therefore be legally exported (see Table 1 for the typology of the main types of stockpiles).

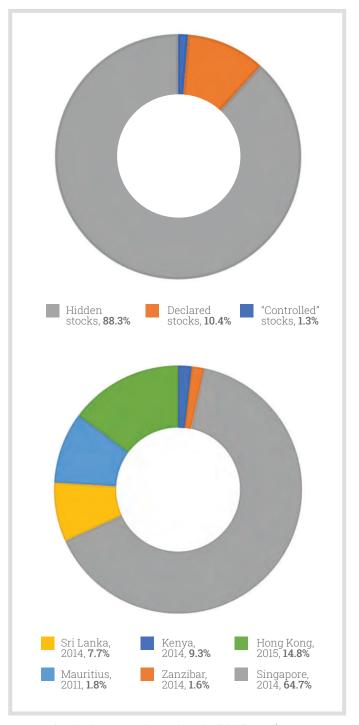
The Standing Committee, at its 66th meeting in 2016, recommended that all Parties suspend commercial trade in these species from Madagascar until the country meets the requirements of the Action Plan adopted at CoP16. This recommendation is still in effect.

In 2017, at the 69th and the 70th meetings of the Standing Committee, Madagascar presented a business plan for the management and disposal of said stockpiles. The plan lacked appropriate measures for oversight and transparency and contained a number of controversies, including "compensation" payments of over US\$7 million to alleged "owners" of the declared stockpiles in order to gain access to the timber stockpiles, including notorious traffickers exposed by EIA ten years earlier. The business plan was subsequently rejected by the Standing Committee. As the pandemic hit and a new government settled in Madagascar, following the election of Andry Rajoelina

Figure 1

Malagasy Timber Stockpiles Overview:

Domestic Stockpile (Above) and Foreign Stockpiles (Below)



 $\textbf{Source:} \ \textbf{EIA, based on documents and assumptions detailed in footnote.}^{4}$

Table 1

The Three Types of Domestic Stockpiles in Madagascar

	Effective Level of Securisation	Inventory and Marking Status	Legal Status
"Controlled" stockpile	Moderate to low	Partially inventoried and marked	Owned by the Malagasy State
Declared stockpile	Low	Minimally inventoried and marked	Unknown
Hidden stockpile	Low	Not inventoried nor marked	Illegal

Source: EIA, based on the same sources as Figure 1.

in late 2018, discussions regarding the management of the stockpiles of rosewood, ebonies, and palisanders in Madagascar slowed between 2019 and 2021 (SC71, CoP18, SC72). SC74 marks the return of the issue to the agenda, with a new proposal from Madagascar, per agenda item 28.3.

DRAGGING THE STOCKPILES OUT OF THE CONVENTION

In October 2021, Ms Baomiavotse Vahinala Raharinirina, the Malagasy minister of environment and sustainable development stated: "It is difficult to do everything at the same time. [...] We wish to exploit the seized logs and then start working on the issue of the stocks that had been dutifully declared, ten years ago." She added that the exploitation of the seized logs will be done locally, in order to meet, for example, the needs of Malagasy artisans and artists.

This approach is confirmed by the SC74 Report of the Secretariat which details that:

"the Minister of the Environment reported that the Government of Madagascar wished to use the 'officially controlled' stockpiles on a domestic level, specifically for building infrastructures, restoring public buildings (e.g., museums, material for schools) and for use by artisans.[...] The Minister of the Environment also stated that the Government no longer intended to export the 'officially controlled' stockpiles, and that only domestic use was considered. These stockpiles would therefore be used to produce handicrafts with the aim of selling them

later to international tourists. In this regard, the Minister clarified that the requirements of annotation #15 would be met. As a reminder, annotation #15 excludes from Appendix II finished products of *Dalbergia spp.* to a maximum weight of wood of the listed species of up to 10 kg per shipment. In other words, no CITES documents would be required for exporting these objects from Madagascar"¹⁰

Under the current scenario the fate of the "declared stockpiles" (see Figure 1) is on stand-by, depending on the assessment by the Standing Committee of the management by the Malagasy government of the domestic disposal of the "controlled" stockpiles.

In its recommendations, which appear in the same document, the Secretariat "notes" three elements with far-reaching consequences. The first one relates to the intention by Madagascar to make domestic use of the "controlled" stockpile, which in practice is equivalent to bringing these stockpiles out of the Convention's purview. The second note draws the conclusion from the first one, by stating that the verification, inventory, and marking, which were preconditions established in the "Stockpile Verification Mechanism and Business" Plan" after much discussion, have become obsolete. Finally, taking this conclusion to the next level, the Secretariat notes that Decision 18.96 (f), which relates to the securitization and inventorying of all the stockpiles - meaning "controlled", declared, and hidden does not apply anymore. The following section details why EIA and TI are highly concerned by Madagascar's newest approach and the Secretariat's interpretation of it.



Figure 2

A "controlled" stockpile in the regional offices of the ministry of the environment in Antsinanana (Toamasina)

CONVENTION EVASION 3



Figure 3
A "controlled" stockpile in the regional offices of the ministry of the environment in Antsinanana (Toamasina)

KEY DETAILS THE STANDING COMMITTEE AND PARTIES SHOULD CONSIDER

As the Standing Committee will decide whether or not to accept the recommendation from the Secretariat, which supports the newest approach from Madagascar that aims at evading the Convention, EIA and TI wish to attract Parties' attention to a few essential aspects detailed in this section.

Un-"controlled" Stockpiles

As reported on many instances, logs have been routinely moved from one type of stock to another, as a way to perpetuate traffic and circumvent enforcement actions. This is in particular the case of the "controlled" stockpile. 11,12 The troubling elasticity of the seized stocks, or the gradually shrinking volume as a consequence of thefts and/or substitution, has been recognized by the Malagasy government and acknowledged by the Secretariat. 13 According to a comprehensive 2013 analysis, more than a third of the volume of seized precious woods were not safely stored. 14 Recent events appear to indicate that the security and location of "controlled "stockpiles remain a problem. In one example, in November 2021, logs from a supposedly "controlled" stockpile were stolen from a forest log yard located in a natural reserve. 15 The traffickers were eventually stopped by Malagasy agents, as stated by Madagascar in its report to SC74 - this report was briefly

posted but taken down at the time of writing, which omits to mention that the seizure followed the theft of logs from a "controlled" stockpile.

The past 10+ years have demonstrated that decisions and use of one type of stockpile directly influence the others, as all are still subject to insecurity and highly exposed to the trafficking dynamics prevailing in the country. In this context, even if the "controlled" stockpile will allegedly be used domestically, it will influence the status of the "declared" and "hidden" stockpiles that remain under the scope of the Convention. For this reason, EIA and TI recommend maintaining the process of disposal of the "controlled" stockpile, international or not, into the CITES purview.

The "Stockpile Verification Mechanism and Business Plan," whose aim is to organize the progressive disposal of the stockpile while preventing laundering, identified the verification, inventory, and marking of the "controlled" stockpile as a key precondition before their use. EIA and TI disagree with the abandonment of this essential precondition, which will directly affect the status of the "declared" and "hidden" stockpile that remain, until further notice, under the scope of CITES.

Furthermore, EIA and TI are confused by the Secretariat's position laid out in the paragraph d)iii of the recommendations. According to the Secretariat's note,

the current decision to pull the "controlled" stockpile out of the Convention (less than 2% of the domestic stockpile) seems to implicate abandoning the necessity, under the Convention, to secure and inventory the - unsecured - declared and hidden stockpiles (more than 98% of the stockpile). EIA and TI wish to highlight the fact that, on the basis of the countless historic precedents reported in Madagascar, the more use is authorized of one type of stockpile, the more likely laundering efforts will increase for the other types. It is therefore essential for the integrity of the declared and hidden stockpile, and their future management, that the recommendation d)iii is amended to clarify that securing and inventorying declared and hidden stockpiles is a prerequisite for their disposal.

Dismantling Trafficking Networks: the Question of Effectiveness

The report of Madagascar to SC74 - briefly posted but taken down at the time of writing, echoing the report presented at SC71, provides a series of statistics regarding law enforcement and efforts to combat timber trafficking. The information presented aims to show progress in this key department. While these efforts are going in the right direction, their effectiveness in dismantling organized trafficking networks remains to be seen. The implementation of the special court illustrates this point.

As a result of three years of negotiation and preparation, a special court composed of ten judges with the mandate to punish high-level traffickers of rosewood and ebonies ("chaîne spéciale de lutte contre le trafic de bois de rose et/ou de bois d'ébène") was created with great fanfare in July 2018. Malagasy civil society received the longawaited news with careful optimism, waiting for the

results to come.¹⁷ The then minister of justice, stated that the initial results should be expected within the first six months.¹⁸ Forty months after the creation of the special court, only six individuals (out of the 155 accused of trafficking) have been placed under detention. EIA and TI are not aware of any high-level trafficker who has been prosecuted or punished. Therefore, the question remains: If the court is aiming at dismantling rosewood trafficking rings by investigating and punishing high-level offenders, why has there not been any prosecution of such high-level individuals?

A Closer Look at the Queen's Palace Reconstruction

In order to defend the new approach, the minister of environment and sustainable development referred to the reconstruction of the Queen's Palace (also known as Anatirova) as a promising proof of concept. A closer look at the dossier indicates a few concerning aspects (Box 1).

According to information obtained by EIA and TI, a large quantity of timber (360 cubic meters) was taken from a "controlled" stockpile more than 24 months ago and it is unclear if the total amount has yet made its way to the palace. 19 The selection process for the companies and individuals involved in the transport and use of the timber remains highly opaque to this date, with no existing track record in the mandatory public procurement system database. Moreover, a few months after the operation was greenlighted by the Malagasy authorities, the ministry of culture and communication irregularly granted an individual the right to transport timber.²⁰ The ministry of environment and sustainable development alone is responsible for granting such authorizations, according to the Malagasy regulation.21

BOX 1

A Closer Look at the Queen's Palace Reconstruction

The Anatirova or Queen's Palace, located in the capital Antananarivo, is the former official residence of the sovereigns of Madagascar in the 19th century. It is part of the national cultural heritage and was converted into a museum, which was ravaged by a fire in November 1995. As a result, the interior decorations and roof were destroyed in the flames, while the structure of the building itself - with its pillars and foundations made of Malagasy tropical hardwood - was dangerously weakened.²²

As part of the renovation process, in 2019, 360 cubic meters of palisanders were taken from a stockpile located at the Mahajanga port, then transported to the nearby Command of Development Forces ("Commandement des Forces de Développement") before being moved to the yard of the private company Tropical Woods.²³ It is unclear what happened to the precious logs after this stage.

Tropical Woods was founded in 1994 and has specialized since 2017 in cabinet making, carpentry, interior design and contemporary furniture. It appears that the company has won the tender for the wood supply for the reconstruction of the Queen's Palace. Tropical Woods reportedly claims that a tender took place and they won it. To this day, EIA and TI have not been able to locate any call for tender nor any administrative procedure regarding the selection of the wood supplier. In particular, it proved impossible to find any documentation in the computerized public procurement management system, where the information should be available according to the Public Procurement Code.²⁴

CONVENTION EVASION 5

Dangerous Power Grab

While no high-level traffickers have been punished yet, it appears that people accused of being involved in illegal log trading have been promoted to the highest level of the government. In October 2021, President Andry Rajoelina nominated Erick Lambert Besoa as senator and then vice-president of the senate, representing the northern part of the island. ^{25,26} Over the past eight years, multiple sources have repeatedly indicated to EIA investigators that Besoa was one of the key rosewood barons who made his fortune trading logs illegally in the aftermath of the 2009 coup. ²⁷

Andry Rajoelina, the current president of Madagascar (since 2019), was coincidentally the president of the provisional government from 2009 to 2014, when Besoa apparently established himself as one of the main rosewood barons on the island. About ten years later, the rich and influential businessman supports the president (Figure 4), as the latter is facing important challenges ahead of his potential re-election and he is gathering support, and resources, in preparation of the 2023 presidential election.²⁸ It is worth noting the parallel with the past, back in 2013, EIA denounced the apparent connection between Rajoelina's decision to authorize the sale of illegal timber stockpiles as the presidential election approached (Box 2). The correlation between election cycles and rosewood trafficking intensity seems to be, once again, an important factor to take into account to understand the current state of play in Madagascar.²⁹

In 2015, the activist Armand Marozafy was jailed for six months and fined 12 million ariary (\$3,600) for defamation, when a confidential report on illegal rosewood logging that he wrote and sent to a civil society partner was made public and posted on social media. Several concerned parties denounced the influence of rosewood traffickers in the court proceedings. It was reported that Marozafy was jailed for his outspoken criticism of the suspected rosewood trafficker Besoa. Besoa is accused of being connected to the arrest of Clovis Razafimalala, another Malagasy environmental activist who was jailed after a broadly criticized legal process. Besoa has denied any involvement in the court case against Razafimalala.

Multiple sources have told EIA investigators that Besoa was one of the rosewood barons who made his fortune trading logs illegally in the aftermath of the 2009 coup.





Figure 4

A suspected timber baron nominated senator, vice-president of the senate, and standing by the president

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BOX 2

Troubling Lessons From the Past

Despite international conservation efforts to curtail the trade, the collapse of the Malagasy government via a military-backed coup d'état in 2009 triggered an outbreak of illegal logging in the country's northeastern protected areas. In a matter of months, thousands of shipping containers of rosewood were exported overseas, "making multi-millionaires of an elite few in the northeast and profoundly reconfiguring the country's geographies of power."³⁸

At the request of the Malagasy Forestry Administration, the explosion in illegal logging and its impacts were investigated and reported by EIA and Global Witness in August 2009, only a few months after it started in February 2009. Investigators witnessed the complete breakdown of the rule of law in the northeast region with regard to the logging, transport, storage, and export of rosewood. They observed an uncontrolled harvest of about 100 to 200 rosewood trees per day centered in three locations in the National Park of Masoala and the Mananara Biosphere Reserve.

EIA and Global Witness also described how an influential group of timber barons who control the trade in precious wood in the northeast region redoubled their pressure on the government to export the precious woods that were stockpiled throughout the region, both in open yards and concealed in forests, beneath stacks of agricultural products, and under buildings. Investigators described the capture of state authorities by the traffickers, and manipulation of the population to blackmail the state into authorizing exports of illegal wood and allowing illicit activity to continue.

In October 2009, the united voices of civil society in Madagascar and around the world stopped Andry Rajoelina, then president of the provisional government, from authorizing the sale of the stocks of illegal rosewood, ebony, and palisanders. At that time, local sources indicated to EIA investigators that proceeds from the stockpile sale, estimated at as much as US\$5 billion, were destined to finance the transitional president's political party's campaign and to buy the support of the military prior to the upcoming election. 40

CONCLUSION AND RECOMMENDATIONS

As people in Madagascar are going through a cascading socio-economic and health crisis, it is essential that the decisions made at SC74 take the governance aspects into serious consideration. A suspected trafficker is promoted by the president to the top of the Malagasy institutional system. High-level traffickers have not yet been punished by the special court against rosewood trafficking. A piloting case of domestic use of palisander logs taken from a "controlled" stockpile is plagued with opacity and irregularities. This is the context of the decision to extirpate the "controlled" stockpiles from CITES Parties's purview.

It is vital that any disposal process, being for alleged domestic use or international trade, must strengthen forest governance - in particular transparency and accountability in the use of the forest resource - and not weaken it. The transparency and accountability standards that are set for the domestic use of the stockpile are directly going to influence the status of the "declared" stockpiles and their manageability in the medium term. Despite the stepwise approach proposed by Madagascar - which artificially isolates the decisions regarding the "controlled" stockpiles from the declared stockpiles - and the Secretariat's endorsement, in the real world, the management of the declared stockpiles is intrinsically connected to and influenced by the decision taken regarding the 0"controlled" stockpiles.

EIA and TI support the Secretariat's recommendations in SC74 Doc. 28.3.2 a) and b), raise utmost concern regarding d) and e), and strongly disagree with the Secretariat's interpretation in d)iii that inventory and auditing of all stockpiles and a use plan based on transparency and independent oversight "are no longer appropriate". In order to avoid yet another rosewood trafficking crisis,

EIA and TI recommend:

- Confirmation of the legal status, localization, inventory and marking of 100 percent of the "controlled" stockpile before any use.
- Secure the "controlled" stocks, for instance by regrouping all logs in one location.
- Establishment of an operational third-party independent monitor (see the precedents developed in multiple countries in the framework of the Voluntary Partnership Agreements between the European Union and partner countries) with the mandate to evaluate in real time the implementation of the disposal procedure on the ground.
- Creation of a corruption-free oversight body composed of representatives from: CITES Secretariat, ITTO, the World Bank, the Government of Madagascar, INTERPOL, international and national civil society organizations.
- Development of a fully publicly transparent and accountable management of the revenues from the use of the "controlled" stockpiles.

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 Guarantee supply chain traceability for all the logs disposed, from the stockpile to the final user.

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