

BAN-BOOZLED

How corruption and collusion fuel illegal rosewood trade in Ghana





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ABOUT EIA

We investigate and campaign against environmental crime and abuse. Our undercover investigations expose transnational wildlife crime, with a focus on elephants and tigers, and forest crimes such as illegal logging and deforestation for cash crops like palm oil. We work to safeguard global marine ecosystems by addressing the threats posed by plastic pollution, bycatch and commercial exploitation of whales, dolphins and porpoises. Finally, we reduce the impact of climate change by campaigning to eliminate powerful refrigerant greenhouse gases, exposing related illicit trade and improving energy efficiency in the cooling sector.

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EXECUTIVE SUMMARY¹



Our investigation found that despite a ban placed on the harvest and trade of rosewood (*Pterocarpus erinaceus*) for the fifth time in Ghana in March 2019, and the listing on Appendix II of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) that came into force in January 2017, massive illegal logging and export of Ghanaian rosewood to China continues unabated and with impunity.²

According to the Environmental Investigation Agency (EIA)'s analysis, the equivalent of approximately 6 million Ghanaian rosewood trees have been imported by China since 2012, while bans on its harvest and export have been in place.

Powerful Chinese and Ghanaian traffickers explained to EIA undercover investigators how, with the help of ruling party members and complicity at all levels of government, they have established an institutionalized scheme, fueled by bribes, to mask the illegal harvest, transport, export, and CITES-licensing of the timber. One official of note in the scheme, according to traffickers, is Nana Adu-Nsiah, Executive Director of the Wildlife Division of the Forestry Commission who is in charge – amongst other key responsibilities – of signing CITES export permits. Fraudulent use of “salvage permits,” misdeclaration of timber species, use of “escorts” to deal with control points, forging of official documents, and retrospective issuance of CITES permits, are all among the tricks used in this dirty timber business.

Ghana is poised to become the first African nation and the second in the world, to issue Forest Law Enforcement, Governance and Trade (FLEGT) timber licenses under its Voluntary Partnership Agreement (VPA) with the European Union (EU). Timber that carries a FLEGT license will automatically be considered compliant with the EU Timber Regulation (EUTR) and allowed into the European market without the due diligence usually required from importers. However, the prevailing high level of corruption, collusion, institutionalized trafficking, and the lack of enforcement at the heart of the rosewood crisis, have severely damaged Ghana's forests and rural communities.

6 million rosewood trees have been imported into China while bans have been in place in Ghana.

To end the current rosewood fiasco, EIA recommends:

- 1. A thorough investigation into corruption** and collusion in the government, the Forestry Commission and customs administration, and the dismantling of the institutionalized illegal logging and trade networks;
- 2. Deployment of strict enforcement cooperation** between Chinese and Ghanaian authorities to implement the export ban and the CITES regulations, with the direct involvement of the CITES Secretariat;
- 3. Regional adoption of a zero export quota** for *Pterocarpus erinaceus* by West African range States until the CITES Appendix II requirements for legal and sustainable trade are met and publicly available;
- 4. Immediate inclusion of effective public transparency mechanisms** in the timber sector, with the participation of Ghanaian civil society, and monitoring by a body fully independent from the Forestry Commission.

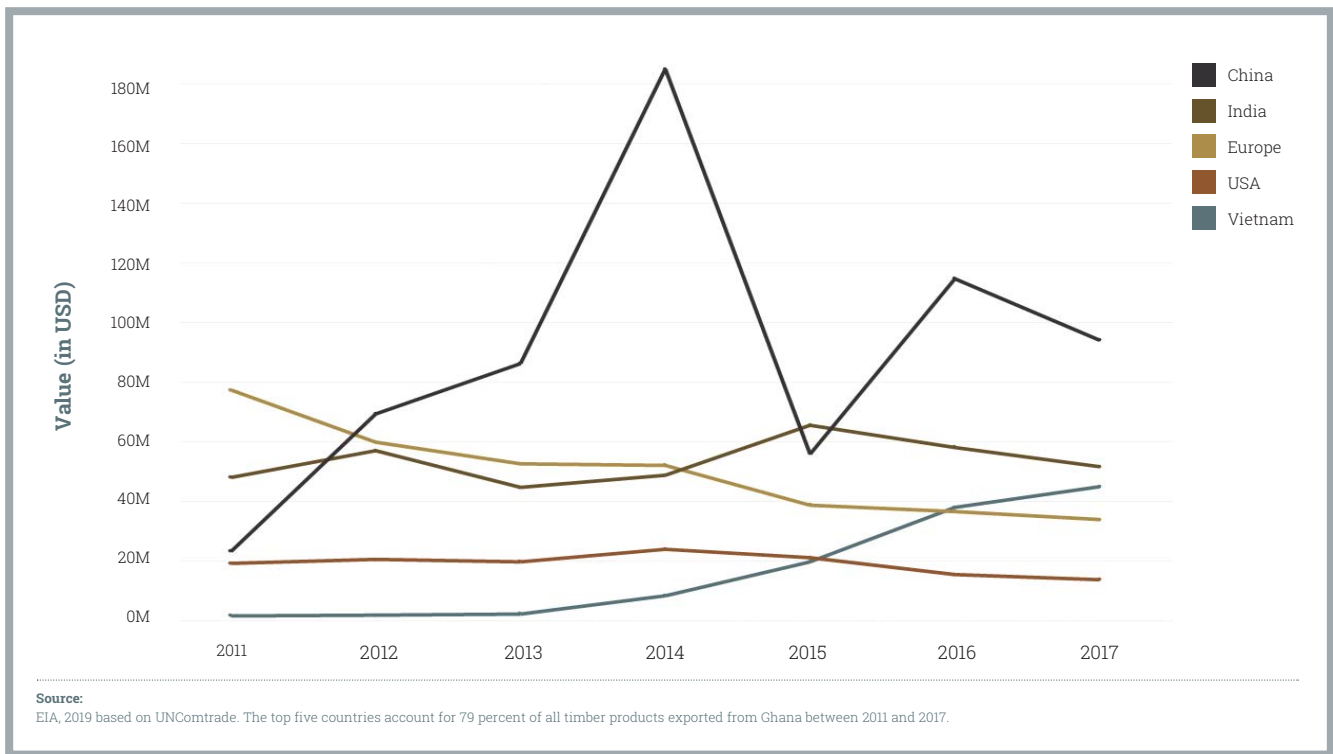


Figure 1
Top five Ghanaian timber partners

THE ROSEWOOD FEVER IN GHANA

Ten years after the signature of the FLEGT-VPA agreement between Ghana and the EU, Ghana indicates its readiness to issue FLEGT-licenses.³ Ghana would be the second country after Indonesia to issue such licenses, thereby enabling all its licensed timber products to automatically meet the EUTR legality requirements and be allowed into the EU market.^{4,5} While the EU is still an important market for Ghana's wood industry, since 2012 Asia has become the number one destination for Ghanaian timber, due largely to soaring demand from China for *Pterocarpus erinaceus*, locally called "rosewood" (Figure 1).⁶ Rosewood is found in about nine of Ghana's sixteen regions (Ashanti, Bono East, Brong Ahafo, Northern, North East, Oti, Savannah, Upper East, and Upper West).⁷ Like several other African countries, Ghana has seen a boom in rosewood production and export since 2011, as precious rosewood species in Southeast Asia have been decimated by uncontrolled over-exploitation.⁸ The rosewood "boom and bust" – resulting in the plunder of fragile dry forests, with harmful impacts on dependent rural communities all over West Africa – has been driven by the neo-antique furniture sector in China.⁹

After Nigeria, Ghana has been the largest exporter of *Pterocarpus erinaceus* to China, and within a few years has become one of the world's largest exporters of "hongmu" – meaning "red wood" in Chinese and having

distinct and desirable features for ornate furniture – to China (Figure 2).^{10,11} Between January 2015 and June 2019 Ghana exported close to \$300 million (542,085 tons) worth of hongmu to China despite repeat bans on harvesting, transport and export.¹²

THE BANS FAILURE

To tackle the surge in illegal and unsustainable harvest of rosewood, a succession of on-and-off species-specific bans have been imposed on the harvesting and trading of Ghanaian rosewood (Figure 3). The bans have been subject to intermittent suspensions – allegedly to allow a few companies to "salvage" abandoned, already logged rosewood.¹³ In practice, the bans have had no impact on reducing rosewood trade, available data shows that to the contrary, exports have increased while the bans have been in place.¹⁴ According to EIA's analysis, over 540,000 tons were imported into China from Ghana while bans have been in place, the equivalent of 23,478 twenty-foot containers or approximately 6 million trees.^{15,16} Since January 2012, more than 50 percent of Ghana's rosewood exports by volume occurred while a ban was in place.

On multiple occasions, traffickers explained to EIA undercover investigators that the ban was not an obstacle to their lucrative business. When one of them was asked when he last shipped rosewood to China, his response was "yesterday," meaning June 18, 2019. Another trafficker explained:

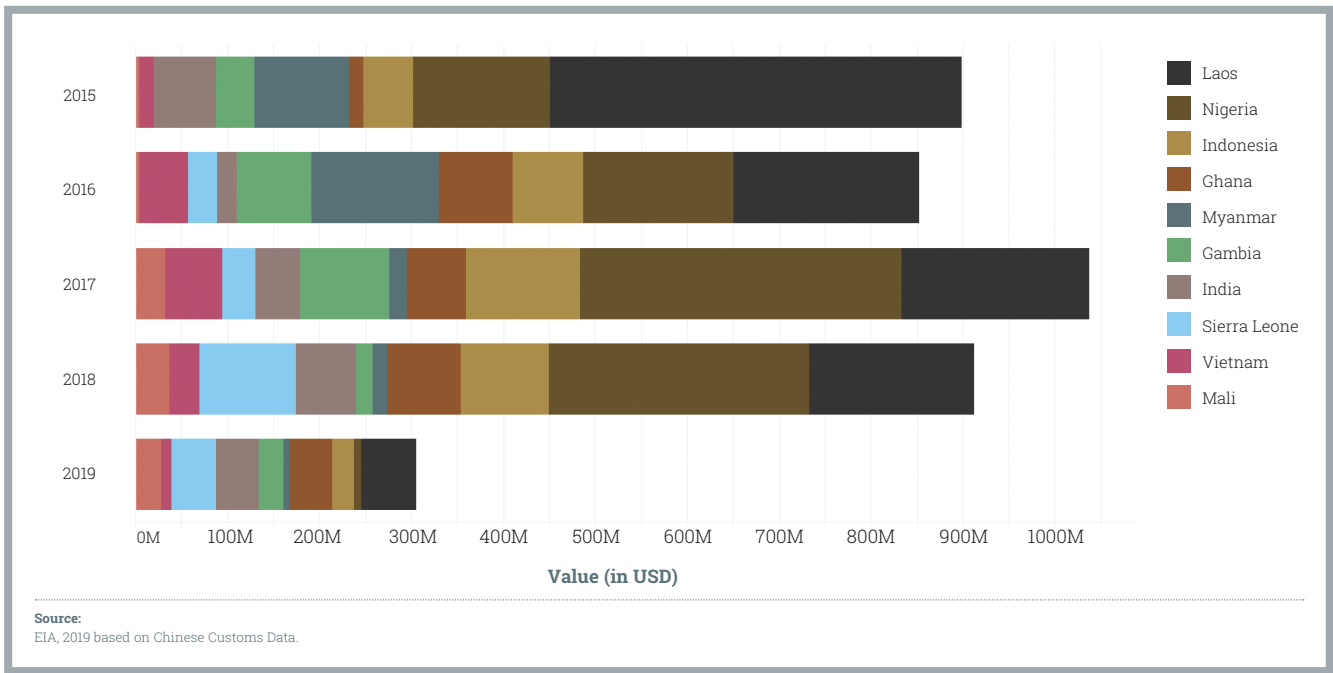


Figure 2
Top 10 hongmu source countries for China, by value

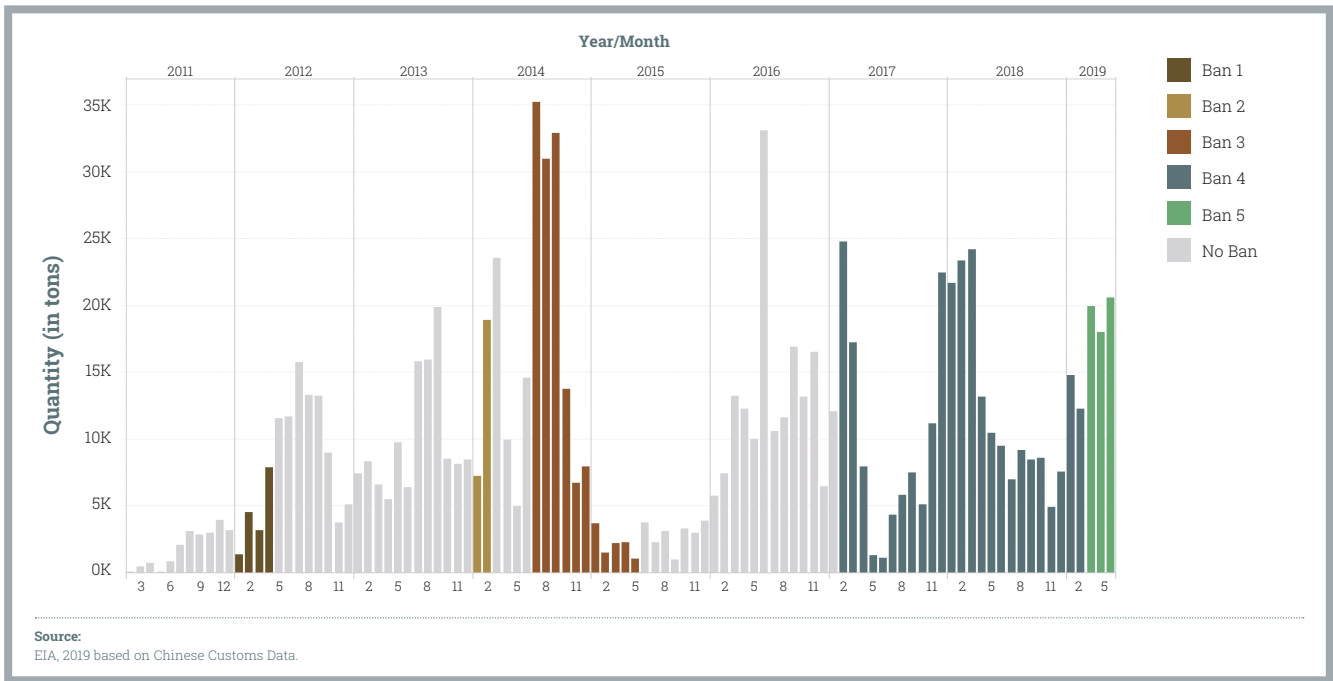


Figure 3
Import of rosewood in China from Ghana while bans are operative

EIA: So even with the ban still standing like now, you can still do it?

Trafficker: You can do it, yeah. [...] For the matter of CITES, once your containers have been shipped, you get a BL [bill of lading], then I get a CITES, that's it. [...] We cannot fail. [...] I don't do what I cannot deliver. I don't start what I cannot finish.

EIA: The ban is not a new thing. It's been closed up, opened up, closed up, opened up?

Trafficker: It's not something that is scary. We're used to it."

Several institutionalized trafficking schemes explain why the bans have had no impact in curbing the illegal and unsustainable logging of rosewood in Ghana.

SALVAGE PERMITS LAUNDERING MECHANISM

The main legal framework for harvesting timber in Ghana in the past has been formal logging concessions based on long-term agreements between the State and private entities that have obtained harvest rights through public auction.^{17,18} However, since the rosewood boom started in 2011, a surge in *ad hoc* logging operations under so-called “salvage permits” has been observed.¹⁹ In theory, salvage permits can only be granted under very specific conditions, allowing the use and/or sale of a limited number of trees that would be felled anyway to make way for approved development projects.²⁰ Contrary to a Timber Utilization Contract, salvage permits are administrative permits directly granted by the Forestry Commission – without parliamentary approval. Genuine salvage permits should have information about the trees (volume) that will be salvaged, the duration of the salvaging, and the location where the salvage will take place. The appropriate use of the permits should be closely controlled by the authorities.²¹ In contrast, according to EIA investigation, traffickers have taken advantage of the opaque issuance procedure of the salvage permits and the lack of enforcement to fell as much trees as they can sell, despite the domestic bans on harvest.

As traffickers told EIA undercover investigators, salvage permits have been continuously used over the past years to cover illegal logging operations, while the government has been turning a blind eye to the situation. One of them explained as follows:

“Trafficker: It is open for everybody. You go and look for it [rosewood]. When you get it, then you come and pay and take your timber with you. [...] The ownership is the chiefs – the landholders. Government only takes its revenue [...] there’s no control about it. [...]

EIA: So that salvage permit, does it specify how many trees you can cut?

Trafficker: Normally they’ll give you a quota, a number. But that doesn’t mean you have to adjust to that. [...]

EIA: So nobody listens to that? Everybody cuts a little bit more?

Trafficker: Yeah. You understand! Because if you give me, let’s say 3,000 cbm [cubic meter], OK? Maybe within a month I exhaust the 3,000, and I still have more logs. Definitely they need to extend that for me. Because I still have buyers. Those ones [salvage permits], they are not a problem at all! They’re not a problem!

EIA: You think the government knows that?

Trafficker: Oh yes, sure! Because whenever we meet, we put all this on table.”

Lacking the checks in place for traditional logging operations, salvage permits have turned into a massive laundering mechanism for illegal timber and

a source of profit for vested political interests. Another trafficker explained to EIA undercover investigators:

“EIA: How many of these contractors are issued these salvage permits? I assume not many, right?

Trafficker: Now there are many. But not all of them are working, you see? And the reason why is because now everything is political in Ghana. They have politicized everything. Now the permits are given to party members. NPP [New Patriotic Party] is the ruling government now. So they give permits to their members, so they can also make some money. [...] They have now come to realize that there is so much money in rosewood business [...] So what they do is that they give permits to party members. He [party member] doesn’t have any buyers, doesn’t know where even get rosewood. So what he would do is that he has the permit and he sells it to you [trafficker]. [...]

EIA: Is that how you get contracts or permits? Or you get it more directly?

Trafficker: No, we get it more directly. Because some of us, [...] like I for instance, have been in this business for many years. [...] I have a very good reputation with the Forestry Commission. [...] Any party that comes to power, they need the support from the Forestry Commission because Forestry Commission are the technical officers. [...] So I don’t have any problem.”

The use of salvage permits as a cover for illegally-logged timber has been widely denounced by civil society in Ghana.²² Ghana’s Forestry Commission has repeatedly declared that the issuance of large numbers of salvage permits had stopped, but according to EIA’s investigation, this is unlikely.²³ Local civil society has expressed concerns about the inappropriate issuance and use of salvage permits.²⁴ Communities and their representatives have stood up against the plundering of their forest and destruction of their livelihoods, like the King of Gonja, Yagbonwura Tutumba Bore Essa I, a – who banned the trade of rosewood on his traditional lands – or the Chief Elder from Bachonsa Community (Figure 4).^{25,26}

The use of salvage permits to cover illegal operations and the rising resistance of local communities has already been widely documented on national television.²⁸ In 2017, journalists of the TV3 Network witnessed illegal rosewood logging with heavy machinery and the subsequent loading of the logs into containers.²⁹ More recently in February 2019, national TV also reported on the use of salvage permits by a few companies to cover the trafficking, as well as the rising “clashes over rosewood” in rural areas (Figure 5).³⁰

Over the past two years, as a consequence of the rapid exhaustion of the rosewood resources, loggers have reportedly been encroaching upon protected areas such as Mole National Park, Gbele Game Reserve, and Wechiau Community Hippo Sanctuary.^{32,33,34}



Figure 4
Chief Elder from the Bachonsa Community denouncing the rosewood crisis



Figure 5
National TV documents the salvage permits fraud

THE BUSINESS OF TRANSPORTING STOLEN TIMBER

All traders, loggers and agents who talked to EIA undercover investigators stated that moving the logs and containers to Tema port is the key and most difficult part of this clandestine business. Transporting rosewood requires a “conveyance certificate,” issued by local Forestry Commission offices. These certificates, which were supposed to be stopped after the ban, are still being issued illegally, through bribes paid to officials as explained to EIA undercover investigators. A trafficker gave further details:

“Trafficker: We pay GH¢3,000 to buy conveyance [certificate] from local trader, but we know they bought it with only GH¢800 from the government directly [...] We mark their permit numbers on our logs.

EIA: So you don’t run into any problem.

Trafficker: Exactly”

EIA’s investigative findings indicate widespread corruption and collusion schemes that implicate the highest levels of the Forestry Commission.

In the absence of a conveyance certificate, traffickers explained to EIA undercover investigators two alternatives to move the timber. One way is to mix illegally-cut rosewood logs with other timber as they are processed into squares and then to mis-declare them as a different species. The other way is hiring an “escort” of well-connected personnel who guarantee the secure movement of rosewood logs from the logging site to Tema port. As explained to EIA investigators, these groups are “connected to ministers and officials in the timber business” and are well aware of whom to pay along the road. Once the logs arrive in Tema port, shipping agents help obtain – or forge – all documents required to clear customs. A Chinese trafficker told EIA investigators:

“Trafficker: Once the logs arrive at Tema, agents have ten thousand ways to ship them out. They can somehow get all documents required to help you export[...]

EIA: So the agents, they know how to forge the document?

Trafficker: They have a way to collect or forge the documents.”

LEGALIZATION OF ILLEGAL TIMBER

Illegal rosewood is also being laundered into legal trade through the abuse of official sales of illegal timber seized by the authorities. When illegal logs are stopped and seized, they become property of the Ghanaian government and fall under the control of the Forestry Commission. Through escorts, traffickers can still have them released by paying a “penalty” of GH¢1,500 – 1,700 (approximately US \$300-350), and receive respective conveyance and CITES permits in return. In other cases, the government launders seized logs back into “legitimate” trade through auctions. A shipping agent reveals the scheme to EIA investigators:

“EIA: How do you get CITES permit?

Shipping agent: We have containers that have been paid for, penalty has been paid on them [...] Some containers have been seized by the government in Accra, the main office for wood, TIDD [Timber Industry Development Division] office, [...] the timber office. [...] So before, we would go to retrieve them by giving the penalty, the fine. You pay the fine, 1,500-1,700 Ghana Cedis. Once the payment is done you’re given a receipt. That receipt will cover the container, it will convey the container to Tema. When we receive the container, we use that and that receipt to process the CITES. No problem.

EIA: Do you have to pay people in CITES office?

Shipping agent: [...] All those are our work... That’s the work we do.”

Even when seized logs go through the official auction process, influential traffickers can still guarantee certain containers “auctioned” to themselves through agreed “fine” payment and kickback. In one case, EIA investigators were shown four containers of rosewood seized by authorities in March and June 2019 from notorious Chinese trader Helena Huang, dubbed the “Rosewood Queen,” whose arrest and release was widely reported in the media (Figure 6, Figure 7).³⁵ One of the most influential Ghanaian traffickers claimed to EIA undercover investigators that these very containers are about to be “auctioned” to him, thanks to his connections. He clarified to EIA investigators:

“EIA: Who was telling you that maybe there’s an auction, and you can bid for them [seized containers]?

Trafficker: The Forestry regional boss [...] He has the power, he’s the regional boss.

EIA: Number one guy?

Trafficker: Yes for the Forestry Commission in the northern region. [...] Generally, I have very good relation with the Forestry.”



Figure 6
The containers seized from Helen Huang about to fall in another trafficker's hands



Figure 7
Political cartoon about the "Rosewood Queen" and the Chinese investment in Ghana

Source: Screenshot of 3News' website®

CITES PERMITS FOR SALE

Several traffickers told EIA undercover investigators that the Ghanaian Forestry Commission is “selling” CITES permits through local traders or agents closely connected to forestry officials. One trader claimed that he “has a way to get CITES” for rosewood export, and explained:

“Trafficker: I have been very good to the Forest Commission. And I have done business for so long with them. And they trust me, OK? So the officer in charge of the CITES, he knows very well that, “If I work- I do CITES for [him], he will not go and expose me.”

EIA: You still have to pay him something, right?

Trafficker: Oh yes! [...] I pay something to him, and he help me. You know, sometimes, they’re risky. [...] They get the CITES for me, because they know I can do. That can easily support somebody’s job. Both me and him.

EIA: Because you’re a friend, they don’t see any documents, just will gives you CITES?

Trafficker: Yes!”

EIA’s investigative findings indicate widespread corruption and collusion schemes that implicate the highest levels of the Forestry Commission and CITES

Management Authority in the country. According to traffickers, bribes and even a “percentage of the sale” paid to Nana Kofi Adu-Nsiah, the Executive Director of the Wildlife Division who is responsible for signing CITES export permits, has allowed them to export illegally sourced rosewood over the past years with CITES permits. One trafficker, closely associated with the Executive Director (Figure 8), explained:

“Trafficker: I’ll go to Nana, he’s the Nana Adu-Nsiah, he’s the overall boss of CITES. He’s in charge. I just go to him [Adu-Nsiah], [...] then I’ll just sit down one-on-one with him. Maybe I go to his house [...] We have some dinner together, some lunch together. Then I will discuss with him! That’s how I do my business [...] I’ll make him understand that for every container I’ll give this to him. [...]

EIA: Give him some percentage?

Trafficker: Yes.

EIA: So with him, there’s no requirements on documents, he just say ‘issue it!’?

Trafficker: Yes. He will just order them to issue it. Then he’ll sign. [...] We were friends before he was the CITES boss. [...] I do help him a lot. He helps me a lot. [...] Even some time people come, I just call him, tell him to do CITES for them. [...] I give him some money. [...] Very good friend.”



Figure 8
The associated trafficker (inset) and Forestry Commission Director (main)

Government bans harvesting of Rosewood



By Kodjo Adams, GNA

Accra, March 15, GNA - The Ministry of lands and Natural Resources has directed the Forestry Commission to ban the harvesting of Rosewood in the country.

Rosewood is one of the tree species found in the middle belt and Northern parts of the country.

The Commission is also to suspend the issuance and processing of the Convention on International Trade in Endangered Species (CITES) permits for the export of Rosewood.

The Ministry explained that harvesting of Rosewood was illegal in any part of the country, adding that the transportation and export of Rosewood had been suspended with immediate effect.

The Commission is also to suspend the issuance and processing of the Convention on International Trade in Endangered Species (CITES) permits for the export of Rosewood.

Source: Screenshot of Ghana News Agency Website, available at: <http://www.ghananewsagency.org/science/government-bans-harvesting-of-rosewood-146882>

Figure 9
Official promulgation of the fifth ban, which includes the suspension of CITES permits issuance

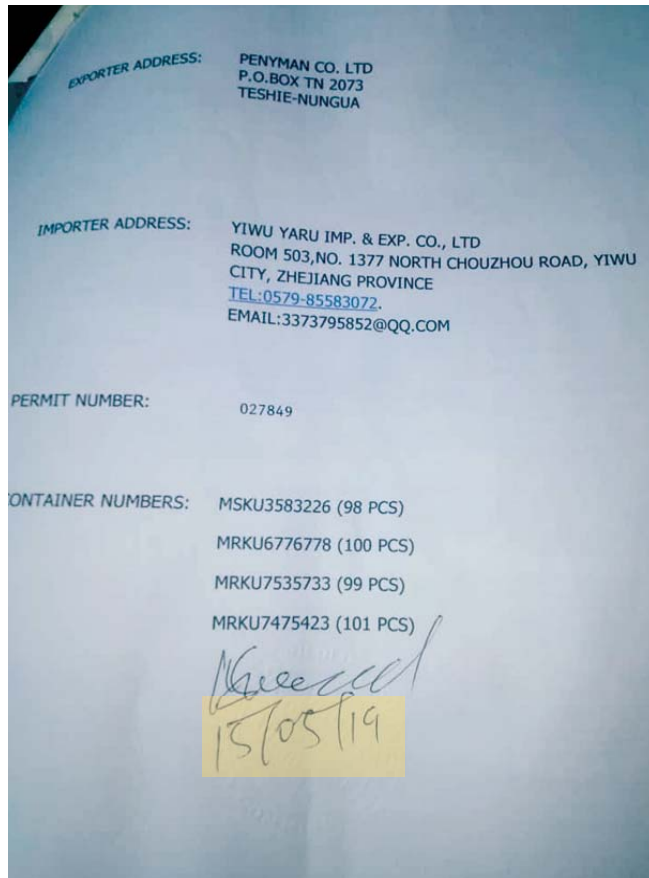


Figure 10
Legal authorization to ship the four containers of rosewood to China signed on May 15, 2019



Figure 11
CITES permit for the four containers of rosewood signed on May 15, 2019

According to several traffickers, this scheme is still taking place at the time of writing this report, despite the fifth rosewood ban promulgated in Ghana in March 2019, which includes an explicit prohibition to issue CITES export permits (Figure 9). Through their connection with Adu-Nsiah and other high-ranking officials, traffickers manage to arrange bill of lading, certificate of origin and CITES permit even after the vessel with the rosewood cargo has left the Ghanaian shore. A case in point, container number MRKU7535733; according to a Ghanaian trafficker, this container was part of a shipment of four containers of rosewood expedited to China with a CITES permit obtained on May 15, 2019

(Figure 10 and Figure 11). However, the tracking information shows that the container had already been unloaded in China and was ready to leave the port of Ningbo (Zhejiang Province) on May 11 (Figure 12). The CITES export permit signed by Adu-Nsiah after the fifth ban on rosewood was in place thus had to be signed retrospectively, in violation of the Convention.³⁸

The paper trail related to the export of container MRKU7535733 indicates that: 1) CITES export permits have been signed after the fifth ban was promulgated (March 2019); 2) CITES export permits have been signed retrospectively, in violation of the Convention; 3) rosewood was unloaded into a Chinese port without a CITES permit, in violation of the Convention. Under the Convention, the movement of listed specimens, such as rosewood logs, can occur without permits only under very specific circumstances such as a traveling zoo, circus, menagerie, or traveling exhibition.³⁹ Container number MRKU7535733 does not fall into these categories. The CITES Secretariat has issued notice on several occasions regarding the nexus between retrospective issuance of permits and illegal trade: “the retrospective issuance of permits and certificates has an increasingly negative impact on the possibilities for properly enforcing the Convention and leads to the creation of loopholes for illegal trade.”⁴⁰

According to EIA’s investigation, all CITES export permits have been issued in violation of the Article II of the Convention for more than two years. A Non Detrimental Finding – the cornerstone element to ensure that the export will not be detrimental to the survival of the species – has not been officially produced in order to determine the sustainable volume of *Pterocarpus erinaceus* annually allowed for export (Box 1).

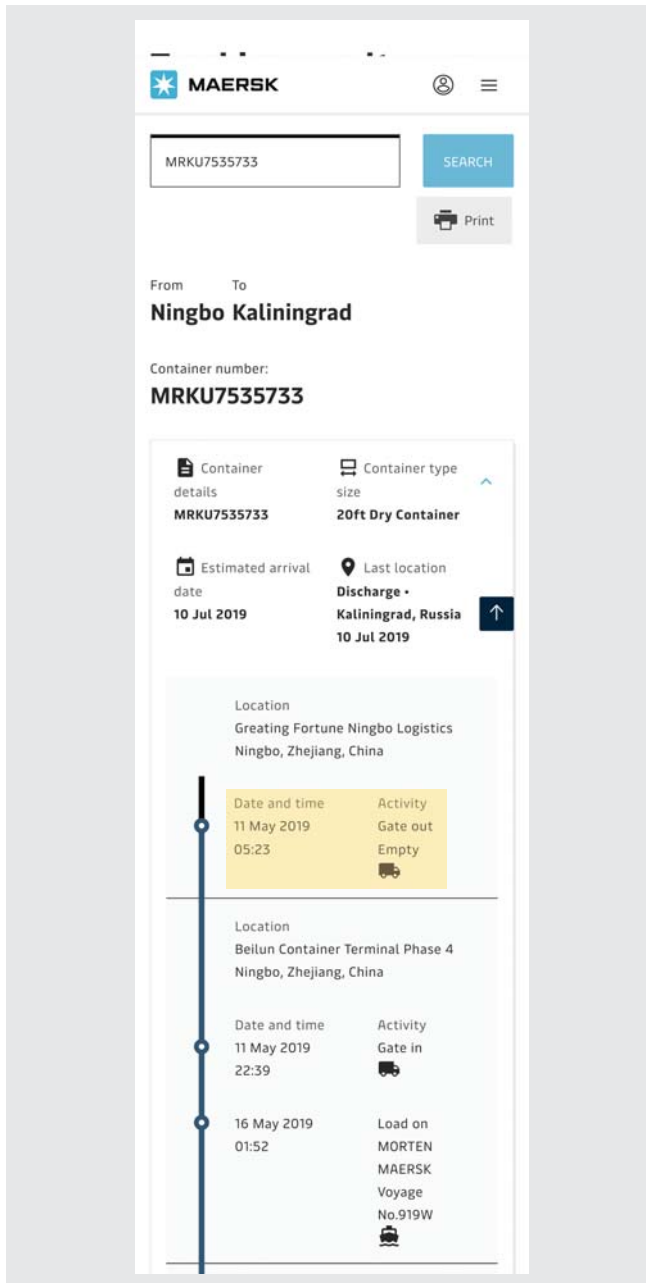


Figure 12
Tracking information indicating that the container had been unloaded on May 11, 2019

BOX 1. **CITES ARTICLE 2**

“2. The export of any specimen of a species included in Appendix II shall require the prior grant and presentation of an export permit. An export permit shall only be granted when the following conditions have been met:

- (a)** a Scientific Authority of the State of export has advised that such export will not be detrimental to the survival of that species;
- (b)** a Management Authority of the State of export is satisfied that the specimen was not obtained in contravention of the laws of that State for the protection of fauna and flora;⁴¹

Source: Screen-shot of MAERSK's webpage with online tracking tool

CONCLUSIONS AND RECOMMENDATIONS

Ghana is in line to become the second country in the world to issue FLEGT-licenses. Ghana is also on track to receive up to \$50 million in payments for verified emission reductions, following the recent signature of an Emission Reductions Payment Agreement (ERPA) with the World Bank under the Forest Carbon Partnership Facility (FCPF).⁴²

In spite of these facts, in the field EIA undercover investigators found an extremely troubling reality. EIA's investigation on the failure of the consecutive bans and the rosewood fiasco sheds light on multi-level corruption, institutionalized illegal logging, and acute forest degradation leading to deforestation and desertification.

To end the current rosewood crisis, enforce the logging and export ban and comply with CITES rules, EIA recommends:

- 1. A thorough investigation into corruption** and collusion in the government, the Forestry Commission and customs administration, and the dismantling of the institutionalized illegal logging and trade networks;
- 2. Deployment of strict enforcement cooperation** between Chinese and Ghanaian authorities to implement the export ban and the CITES regulations, with the direct involvement of the CITES Secretariat;
- 3. Regional adoption of a zero export quota** for *Pterocarpus erinaceus* by West African Range States until the CITES Appendix II requirements for legal and sustainable trade are met and publicly available;
- 4. Immediate inclusion of effective public transparency mechanisms** in the timber sector, with the participation of Ghanaian civil society, and monitoring by a body fully independent from the Forestry Commission.



ACRONYMS

BL	Bill of lading
CITES	Convention on International Trade in Endangered Species of Wild Fauna and Flora
EIA	Environmental Investigation Agency
ERPA	Emission Reductions Payment Agreement
EU	European Union
FCPF	Forest Carbon Partnership Facility
FLEGT	Forest Law Enforcement, Governance and Trade
NPP	New Patriotic Party
TIDD	Timber Industry Development Division
VPA	Voluntary Partnership Agreement

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