

THE ONGOING ILLEGAL LOGGING CRISIS IN MADAGASCAR: AN EIA BRIEFING FOR CITES SC65



Malagasy rosewood logs seized by KWS in Mombasa port, May, 2014. Sources indicate that log markings show provenance from Madagascar government-registered stockpiles.

INTRODUCTION

Since 2009, the impoverished island nation of Madagascar has fallen prey to a mafia of illegal rosewood traders, threatening all that remains of its once pristine forests, home to some of the world's greatest and most spectacular biodiversity. Madagascar's protected rosewood trees, now found only in remote corners of its national parks, are the target of an inexplicable appetite for high-end furniture in China, where a metric ton of Malagasy rosewood currently sells for \$25,000 USD. Less than 1% of the profit from this completely illegal trade remains within Madagascar - the lion's share flowing to Chinese manufacturers and traders, and siphoned into the offshore accounts of timber barons and corrupt officials.

Madagascar has reached a crossroads. Elections brought a new president in January, 2014, who has declared "war" on the illegal rosewood trade. Yet stockpiles of illegally harvested rosewood and ebony, which line eastern shorelines often hidden from any official oversight, continue to be smuggled out of the country on a weekly basis under the cover of darkness and transshipped through ports such as Zanzibar and Hong Kong, where customs officials turn a blind eye, and governments refuse to abide by their international commitments. Ever

deeper inside Madagascar's national parks, the logging continues, eight years since it was banned completely.

CITES, the Convention on International Trade in Endangered Species, provides a powerful tool in halting this illegal trade. In 2013, Madagascar listed its populations of rosewood and ebony on Appendix II, offering additional protections to these highly threatened species. CITES member states need to uphold the commitment they made to the people and forests of Madagascar by cracking down on all illegal imports of Malagasy timber. China, which has taken active steps in closing its

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mainland borders to CITES-listed rosewood, needs to ensure that its territory of Hong Kong immediately updates its local legislation to respect China's CITES commitments and arrests the illegal smugglers dealing in Malagasy rosewood. Transshipment countries, in particular Tanzania, home to the key transit hub of Zanzibar, need to follow the example of Kenya, Sri Lanka, and Singapore, and seize all incoming shipments of illegal timber. Any weaknesses in implementing legislation that hinder such efforts must be immediately addressed. The new government of Madagascar needs to change its words into action, and prosecute and imprison the handful of timber barons who continue to devastate its forests and the people who depend upon them.

BACKGROUND

Malagasy rosewood (*Dalbergia spp.*) and ebony (*Diospyros spp.*) have been sought after for centuries, by locals for use in crafts and by Western stringed instrument craftsmen for their aesthetic beauty and structural durability. Since 2000, facing a rapid increase in exploitation, the government of Madagascar imposed a series of bans on the harvest and export of these precious timbers, culminating in a complete ban on all harvesting in 2006.¹ Despite this ban, the logging continued,

CHINA'S IMPORTS OF "ROSEWOOD" LOGS FROM MADAGASCAR – VOLUME, BY CUSTOMS DISTRICT

Note: the expression "rosewood" logs is defined here as all products classified under China's commodity code 44039930.

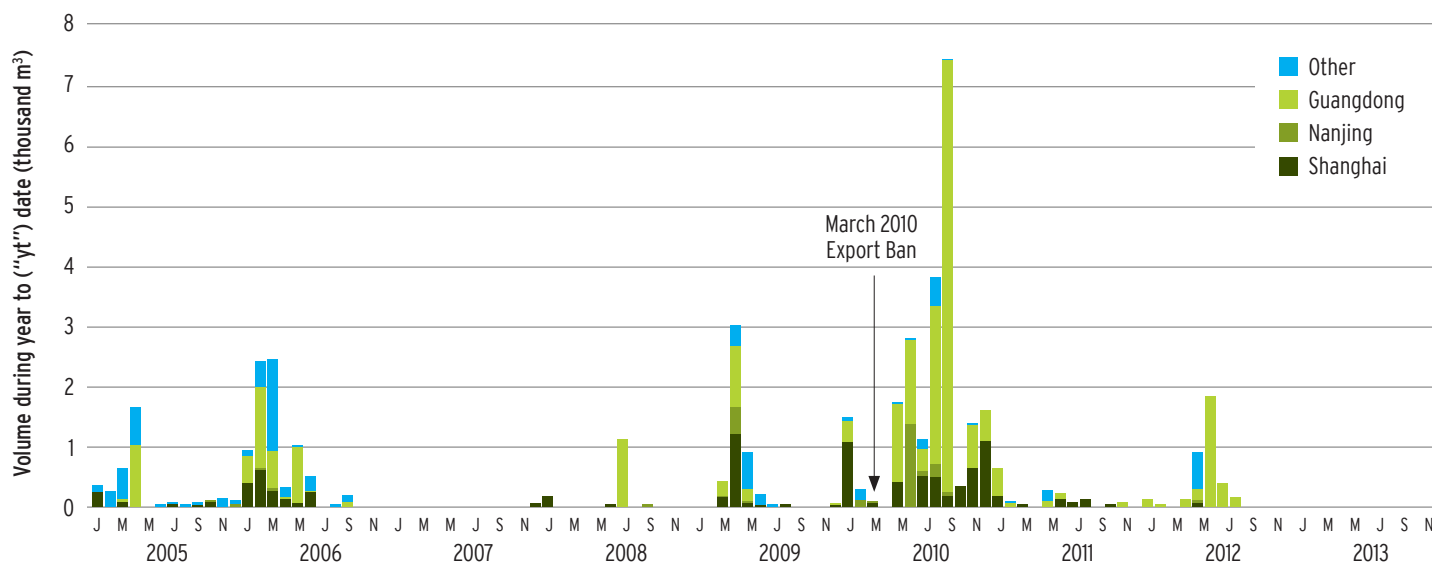


Figure 1

Source: based on General Administration of Customs of People's Republic of China

reaching catastrophic levels following a military coup in 2009.² Investigations conducted by EIA and Global Witness in 2009 uncovered the illegal harvest of about 100 to 200 rosewood trees per day in northeastern Madagascar.³ From 2006 to 2010, stockpiles of seized illegally harvested rosewood and ebony were sold in supposedly "one-off" sales.⁴ Each sale profited a small group of thirteen timber barons, many of whom still dominate the trade in precious woods from northeastern Madagascar, and fueled further logging in anticipation of future "one-off" sales.⁵ The conditions under which these authorizations for "extraordinary exports" of illegal stocks by the timber barons, with payment of a penalty, were granted remain highly dubious. The majority of these logs, upwards of 95%, were shipped to China to feed the burgeoning hongmu, or "redwood", furniture industry, while a small portion of this timber was sold

Many of these logs have come from government-registered stockpiles, as evidenced by markings on logs seized outside of Madagascar.

to musical instrument manufacturers in the United States and European Union.⁶

Faced with mounting international pressure, Madagascar's transitional President Andry Rajoelina signed Decree 2010-141 in March 2010, unconditionally banning all harvest, transport or export of rosewood or ebony, followed by Ordinance 2011-001 in August 2011, detailing penalties for offenses relating to rosewood and ebony harvest and trade. However, logging and export have continued throughout the past four years. Official government stockpiles of rosewood and ebony now total around 3,200 cubic meters.⁷ However, Chinese government import statistics confirm that, in the four years since the ban, Chinese traders have imported at least 25,364 cubic meters of officially declared rosewood and ebony (around 200,000 logs) from Madagascar in direct violation of Madagascar's laws (See Table 1). In addition, three seizures in transit countries during the first half of 2014 netted nearly 4,000 cubic meters - and these seizures are estimated to represent only a small fraction of the total logs which have been smuggled out of Madagascar.⁸ The trade data indicates that direct imports into China have ceased almost completely since August 2012, although mainland Chinese traders state that smuggled rosewood continues to enter the country, therefore the actual volume of imports is likely much higher.

Within Madagascar, sources indicate that rosewood smuggling has increased dramatically since the summer of 2013. News reports linked the continued trade in 2013 to the election process, as candidates reportedly used proceeds from the illegal precious woods trade to fill their campaign coffers. In September 2013, transitional President Rajoelina attempted to push Parliament to approve a rapid sale of existing stocks, a large proportion of the proceeds of which would directly finance the military in advance of the planned elections.⁹

No longer limited to the northeastern Sava peninsula, illegal rosewood logging has spread down the eastern coast, encompassing all source regions where this highly valuable timber is found. Complex organized criminal networks, including elements within customs and local law enforcement, smuggle rosewood containers out through official ports,¹⁰ or transport logs under cover of night from remote beaches via small boats to large vessels waiting offshore - a hazardous trade which recently claimed as many as thirty lives.¹¹ Many of these logs have come from government-registered stockpiles, as evidenced by markings on logs seized outside of Madagascar.¹²

In February 2014, the new president of Madagascar, Hery Rajaonarimampianina, declared "war" on the illegal smuggling of rosewood,¹³ though suspicions remain about the new government's commitment to ending the illegal rosewood trade. A notorious

rosewood trader, Jean Pierre Laisoa, known as Jaovato, and other rosewood traders campaigned openly on behalf of the new president, throwing lavish election rallies.¹⁴ Jaovato himself was recently elected to Parliament as a representative of the town of Antalaha, the gateway to the nearby Masoala National Park, which since 2009 has been the epicenter of illegal logging. Soon after entering office, the new President stated publicly that he intends to declare an amnesty for all rosewood traders, provided they cease illegal activities after his tenure began, on January 25, 2014.¹⁵

The new Minister of the Environment, Ecology, and Forests, Anthelme Ramparany, has been accused of being closely connected to the illegal rosewood trade. In 2012 he was an organizer of a conference in northeastern Madagascar, which pushed for the re-opening of the rosewood trade. He formed a new political party, together with the rosewood trader and new MP Jaovato and during the transitional government, he was a member of a parliamentary commission charged with investigating the rosewood trade, which failed to reach any conclusions, and which contained other members suspected of being rosewood traders themselves.¹⁶ In the face of such suspicions, the new government must take strong and immediate steps to demonstrate its commitment to ending the illegal rosewood trade.

CHINA'S ROSEWOOD OBSESSION

Over the last decade, the swelling upper class in China has developed a seemingly endless appetite for luxury rosewood furniture, referred to as “*hongmu*”, or “red wood”. Extremely ornate, hand-carved hongmu furniture can be found in high-end malls and boutiques all over China. The price of a piece of rosewood furniture ranges from a few thousand US dollars to close to a million, depending on the size and intricacy of craftsmanship of the product. The retail price of rosewood furniture has tripled over the last 5-10 years.¹⁷

IMPACTS ON SUSTAINABLE DEVELOPMENT AND ENDEMIC WILDLIFE

Madagascar’s national parks, including the UNESCO World Heritage Masoala and Marojejy national parks, which contain some of the world’s most unique biodiversity and some of

its most threatened species, notably primates and lemurs, remain under siege by illegal loggers.¹⁸ Over the past decade, these forests have witnessed an onslaught of illegal loggers, who also poach lemurs and other wildlife for bushmeat.

Madagascar is one of the poorest countries in the world, with a World Bank gross national income (GNI) value of \$430 in 2012.¹⁹ With 70% of the population residing in rural settings, the vast majority of the Malagasy people depend on the environment for subsistence living. Illegal logging of rosewood and ebony enriches a very small group of timber barons at the expense of rural communities, who lose access to food and clean water and become more susceptible to flooding and mudslides. Loggers themselves receive only a few dollars a day for back-breaking work, with few guarantees for their safety or even wages. Meanwhile the natural resources and unique biodiversity, key to Madagascar’s

once-profitable tourism industry, are being destroyed forever.

SMUGGLING ROUTES

Over the past two years, China’s government has taken limited steps to tighten its controls on illegal rosewood imports from Madagascar, including at least one large crackdown on smugglers of Malagasy rosewood and other similar species in 2013.²⁰ However, as demand for rosewood furniture within China continues to grow, complex smuggling routes have developed to connect Madagascar with this market. Offshore transit vessels, which range in size from open-hulled bulk transporters to simple fishing boats, load rosewood from small boats and take their cargo to nearby ports. In recent months, Zanzibar and Mozambique appear to be the most commonly used. In Zanzibar, rosewood logs are offloaded in the open, often under the watch of police



Logging camp near Masoala National Park

and customs officials,²¹ and loaded directly into shipping containers. These containers are then loaded onto cargo vessels bound for Hong Kong, but are often transshipped through various intermediary countries to mask their origin. Three recent cases illustrate how these routes have shifted in just the past few months.

CASE 1: MV BRAVO, ZANZIBAR-MALAYSIA-HONG KONG

In February 2014, Zanzibar customs officials in cooperation with CITES authorities, seized six containers of rosewood filled with 781 logs illegally smuggled from Madagascar. The local newspaper article reported on February 13th, 2014 that the Deputy Permanent Secretary in the Ministry of Agriculture and Natural Resources, Dr. Bakari Asseid, said that Zanzibar had yet to ratify international laws on the protection of endangered forest and wildlife

species though the Union government has already done so, referring to Tanzania’s CITES commitments.²² Two days later, a Malagasy news article reported that Tanzania had failed to seize an additional 1,996 rosewood logs, which it reported had already left Zanzibar.

Shipping records indicate that, in fact, these logs left Zanzibar days after the reported seizure. A photo in the Tanzanian article shows a container being filled with rosewood logs in Zanzibar’s port (See Photo 1). The container number, clearly visible, is CMAU 009905-3. CMA-CGM’s online container tracking website shows that this container left Zanzibar port on February 15th, on the MV Bravo (see Figure 2). The container was offloaded in Port Kelang, Malaysia, then reloaded onto the Maersk Santana. On March 20th, 2014, the Maersk Santana docked in Hong Kong, where these 1,996 Malagasy rosewood logs were likely offloaded (see Figure 3).

CASE 2: EM CHIOS, ZANZIBAR-SRI LANKA

On April 2, 2014, Sri Lankan customs officials announced the seizure of 420 tons of rosewood (3,669 logs) with an estimated total value of \$7.6 million USD. At the time, officials proclaimed that this seizure of twenty-eight containers, was the largest ever recorded of rosewood.²³ According to CMA-CGM online tracking, the containers seized by Sri Lankan authorities were originally loaded in Zanzibar on March 2nd, and were destined for Hong Kong, by way of Malaysia (See Photo 2 and 3, Figure 4). Evidence obtained by EIA indicates that this rosewood originated in Madagascar. Thanks to the vigilance of Sri Lankan customs authorities, these illegal goods were prevented from reaching Hong Kong.

Photo 1: Malagasy rosewood logs loaded into containers in Zanzibar port, January 2014. Container number CMAU 009905-3 visible on right.



Figure 3: Arrival of Maersk Santana in Hong Kong, carrying

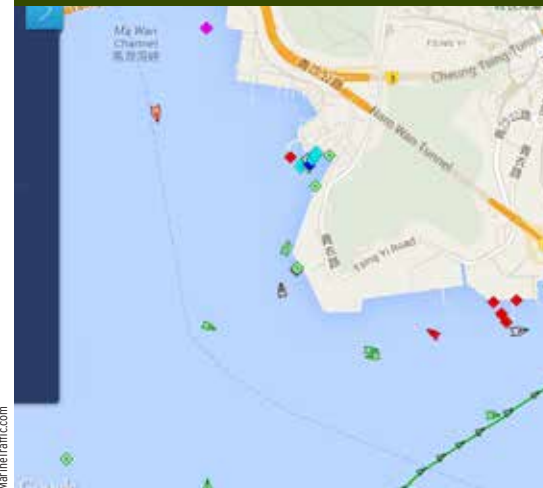


Figure 2: Online container tracking showing route of CMAU 009905-3, from Zanzibar to Hong Kong.

Tracking details for Container CMAU0099053

Current status	Discharged in transshipment	Receipt	Port of loading	ZANZIBAR (TZ)	Last discharge port	HONG KONG (HK)	Container size	20	
ETA last port	Wed 19 Mar 2014 23:00	Port of loading	ZANZIBAR (TZ)	Destination	HONG KONG (HK)	Container size	20	Type	ST
		Custom number	N/A						

Date	Moves	Loc.	Vessel	Voyage
Fri 14 Feb 2014 21:30	Empty to shipper	ZANZIBAR		
Sat 15 Feb 2014 08:30	Ready to be loaded	ZANZIBAR	BRAVO	02388E
Sat 15 Feb 2014 22:30	Loading on board	ZANZIBAR	BRAVO	02388E
Mon 10 Mar 2014 01:08	Discharged in transshipment	PORT KELANG	BRAVO	02403W
Fri 14 Mar 2014 08:00	Departure	PORT KELANG	MAERSK SANTANA	02388E
Wed 19 Mar 2014 23:00	Arrival final port of discharge	HONG KONG	MAERSK SANTANA	02388E

Photo 2: Sri Lankan customs officials inspect seized



CASE 3: MV KOTA HAPAS, ZANZIBAR-MOMBASA

On May 5th, 2014, Pacific International Lines' MV Kota Hapas loaded thirty-four containers of Malagasy rosewood in the port of Zanzibar. On May 26th, Kenyan Wildlife Service (KWS) officials announced the seizure of these containers in the port of Mombasa, where they had been unloaded for transshipment. According to shipping records obtained by KWS, this cargo was destined for Hong Kong. Based on previous shipments, EIA estimates that this seizure consisted of around 4,400 logs weighing over 500 tons, making it even larger than the Sri Lankan seizure the previous month. At the current value of \$25,000 USD per ton, this seizure would have been worth around \$12.8 million USD on Chinese markets.

SMUGGLING ROUTES: OTHER SEIZURES AND LOG MARKINGS

In each of these cases, the majority of the logs seized are painted with markings indicating they came from government-registered stockpiles. This confirms suspicions that many of these stockpiles have not been properly controlled, and that they are being used to launder freshly cut timber.

In addition to these three cases, there have been numerous reports of additional seizures of Malagasy rosewood in recent months, as reported in leaked Malagasy government correspondence.²⁴ This leaked document notes eight recent seizures in Madagascar, totaling around 12,000 logs; a seizure of 90 tons of rosewood in Pemba, Mozambique; and finally an enormous seizure of 3,000 tons of Malagasy rosewood in Singapore, totaling

nearly 30,000 logs – the same number as are listed in official government stockpiles.²⁵

SMUGGLING INTO MAINLAND CHINA

In all of the recent cases where evidence is available, Malagasy rosewood logs are destined for Hong Kong. Prior to 2013, Chinese customs records indicate that a large amount of Madagascar rosewood entered directly to the Chinese mainland (See table 1). In the four years since Madagascar banned the export of rosewood and ebony completely, Chinese traders have imported 25,364 cubic meters of rosewood and ebony. Since the beginning of 2013, officially-registered direct imports to the Chinese mainland have largely disappeared. However, since mid-2013 rosewood dealers in China have reported that they are still receiving new shipments of Malagasy rosewood.²⁶

Malagasy rosewood loaded in Zanzibar two months prior.



Photo 3: Container number visible in Sri Lankan rosewood seizure footage



Sri Lanka customs, port of Colombo

Malagasy rosewood, April, 2014.



Figure 4: Online container tracking for EM Chios from Zanzibar to Hong Kong. Containers seized in Colombo, Sri Lanka

Tracking details for Container CMAU0150303

Current Status	Discharged in transshipment	Port of loading	ZANZIBAR (TZ)	Last discharge port	HONG KONG (HK)	Container no.	20
ETA last port	Thu 10 Apr 2014 06:00	Port of loading	ZANZIBAR (TZ)	Destination		Type	58
		Container number	N/A				

Container Moves

Date	Notes	Loc.	Vessel	Voyage
Fri 28 Feb 2014 00:00	Ready to ship	ZANZIBAR		
Sun 02 Mar 2014 12:00	Ready to be loaded	ZANZIBAR	EM CHIOS	DZ399E
Sun 02 Mar 2014 23:00	Loaded on board	ZANZIBAR	EM CHIOS	DZ399E
Tue 25 Mar 2014 13:22	Discharged in transshipment	COLOMBO	EM CHIOS	DZ399E
Thu 27 Mar 2014 05:00	Departure	COLOMBO	SURETY	SM736E
Mon 31 Mar 2014 06:00	Discharge	PORT ISLAND	SURETY	SM736E
Sat 05 Apr 2014 00:00	Departure	PORT ISLAND	SURETY	SM736E
Thu 10 Apr 2014 00:00	Arrival (at port of discharge)	HONG KONG	SURETY	SM736E

Workers at ebony sawmill in Antalaha



Toby Smith / EIA

Recent investigations by EIA reveal that Hong Kong has grown into the primary transshipment point for illegal CITES-listed rosewood species from around the world.²⁷ Despite China being a party to CITES, Hong Kong has yet to update its relevant legislation to fully uphold its obligations under the Convention, particularly with respect to Appendix II listings for Malagasy, Siamese, and Belize rosewoods, a full year since they came into force.^{28,29} In undercover interviews, rosewood dealers in Shenzhen and Hong Kong explained that CITES-listed rosewood could be imported into Hong Kong without proper documentation. Once in Hong Kong, the logs are unloaded and reloaded into new containers, declared as a non-CITES listed species with a similar look, feel and weight, and smuggled into mainland China. Smugglers offered their services for transporting logs from Hong Kong into Guangzhou for 22,000 RMB (\$3,500 USD) per ton.

In May 2013, customs officials in Huangpu port in southern China conducted an early-morning raid, arresting forty-eight individuals among twelve criminal gangs, charged with illegal smuggling from Hong Kong to mainland China of Malagasy rosewood, padauk, Siamese rosewood, and other precious timbers, valued at RMB 3.16 billion (\$500 million USD). In undercover conversations, rosewood traders in nearby Shenzhen revealed to EIA investigators that all of their former contacts in Huangpu customs were sacked or transferred after this raid, but they assured

EIA that they had already established new relationships with the new staff, and that smuggling was again possible.³⁰ As of March, 2014, Chinese dealers still offered EIA freshly imported supplies of Malagasy rosewood for around \$25,000 USD per ton.³¹

MADAGASCAR RESPONSE TO THE ILLEGAL LOGGING CRISIS

In 2011, the transitional government of Madagascar declared a short amnesty period during which operators could declare their stocks of rosewood and ebony without incurring penalties. In August 2012, Madagascar Prime Minister Omer Beriziky created a Steering Committee to develop and oversee an Action Plan to dispose of these accumulated rosewood stocks. The World Bank, in consultation with this Steering Committee, is financing several technical studies to support development of the Action Plan. The studies are intended to provide the necessary analytical data, as well as identify possible courses of action “based on principles of good governance and transparency, and long-term impacts for forest governance in Madagascar.”³²

In March 2013, Madagascar listed its populations of rosewood and ebony on Appendix II of CITES with an accompanying Action Plan detailing additional measures to ensure the protection of remaining stocks in the wild. When fully implemented, an Appendix II listing ensures that no exports will be allowed if international trade threatens the species with extinction. The scientific authority must first conduct an assessment of available stocks and determine what, if any, quantity of the species can be exported without threatening the species with extinction. Management authorities may only issue an export permit if the specimen was *legally* obtained and if the export will not be *detrimental to the survival of the species*.³³ Given the severity of the illegal logging crisis in Madagascar, the action plan also identifies the following next steps to ensure protection of remaining stocks of rosewood and ebony:

1. Establish a science-based export quota based on transparent non-detriment finding;
2. With key partners, establish a process to identify the key species to be exported;
3. With key partners, prepare identification materials for use in CITES enforcement;
4. Put in place an embargo on export of stocks of these timbers until the CITES Standing

Committee has approved the results of a stockpile audit and use plan to determine what component of the stockpile have been legally accumulated and can be legally exported;

5. Collaborate, as appropriate, and with key partners, as indicated in paragraph 2 above, to establish enforcement mechanisms to assist in implementation of any export quota, stockpile control and opening of any legal and sustainable trade utilizing timber tracking systems and other technology as appropriate;
6. Provide written progress reports to the Secretariat and Plants Committee;
7. Provide a document outlining progress with the implementation and any required adjustments to the Action Plan at the 17th meeting of the Conference of the Parties.

In its report on implementation of the action plan, SC65 Doc 48.2, submitted for the CITES Standing Committee in July 2014 (SC65), Madagascar has expressed a desire to sell all of its rosewood and ebony stocks as quickly as possible, and indicated that the CITES Secretariat should approve its Action Plan and grant permits for this sale.³⁴

As overwhelming evidence indicates, Madagascar has so far done very little to show that it can maintain required controls on current stockpiles and logging within national parks required by the CITES for Appendix II listings. There remains a severe lack of basic law enforcement capacity in key areas, allowing illegal extraction, storage and transport to continue unabated for the past four years.

The assessments of wild stocks and seized stockpiles are far from complete. As the report on the Action Plan notes, the “stock assessment was seriously hindered by the lack of security in the study areas”. Even from the partial evidence provided from the lesser impacted areas, the Action Plan paints a dire picture: among the 37 species of rosewood and ebony studied, only five populations of ebony have a “good” status. The report notes, “Most species...are at very high risk of disappearing.” Various scientific studies indicating that no commercially viable stocks of rosewood remain outside of national parks.³⁵

Madagascar has not yet fulfilled its obligations under CITES to allow commercial trade. Resources should be immediately deployed, and the Malagasy Government should fully support, the securitization and accurate inventory of all existing seized, declared and hidden

stockpiles of rosewood and ebony, both to prevent further illegal shipments of these logs and to prevent new trees from being illegally logged and laundered into the stockpiles. A scientific assessment of existing populations in the wild and an evaluation of the impact of reinstating trade in these threatened species must also be carried out. All evidence-based reports indicate that the existing stocks cannot sustain any ongoing trade without the survival of the species being threatened. Therefore, the Standing Committee should include all species of Malagasy *Dalbergia* and *Diospyros* in the Periodic Review, to consider if an Appendix I listing is warranted to protect these species from extinction. Greater support must also be provided from international partners to ensure law enforcement officials have the necessary resources to carry out their responsibilities.

Key transit ports, primarily Hong Kong and Zanzibar, do not have adequate measures in place to prevent the import or transshipment

of Malagasy rosewood. No exports of Malagasy rosewood should be permitted until all CITES member countries have formalized implementation regulation as required under their CITES commitments.

CONCLUSION

The tens of thousands of Malagasy rosewood logs seized abroad, and the tens of thousands of logs lying in stockpiles throughout the country, stand in testament to Madagascar's continued failure to implement strong forest governance, and to the international community's failure to meet its obligations to stop receiving illegally harvested rosewood from Madagascar.

The wealth, power, and impunity evidenced by Madagascar's rosewood traders, despite scientific studies indicating that no commercially viable stocks of rosewood remain outside of national parks, and despite a continuous ban on all harvesting

of rosewood and ebony for the past eight years, shows that the "rosewood industry" in Madagascar is founded solely on trade in illegal products. Instead of discussing amnesties and compromises, the government of Madagascar needs to prosecute all known and suspected traders with the full force of the law.

China should be commended for actions that it has taken to halt direct imports of Malagasy rosewood over the past year, and for its limited enforcement actions against rosewood smugglers in the mainland and in Hong Kong. However, China bears the greatest degree of responsibility for the worldwide damage caused by its appetite for rosewood and it must now take active and immediate measures to coordinate with all rosewood range states to ensure that rosewood extraction occurs in a sustainable, legally controlled, and mutually beneficial manner, which preserves these unique species and the habitats they support for decades to come.

RECOMMENDATIONS:

1. CITES STANDING COMMITTEE

- a. Delay consideration of approval of the stockpile audit and use plan until at least SC 66 and provide support to ensure completion of all actions listed in the Action Plan annexed to Madagascar's Appendix II listing;
- b. Request that the Secretariat coordinate with INTERPOL and the international community to assist Madagascar to dismantle criminal mafias controlling rosewood and ebony trade, including arrest and prosecution of key actors in Madagascar, Hong Kong, and other key transit and destination countries.

2. MADAGASCAR

- a. Initiate an immediate crack down on the illegal rosewood mafias, with an aim to prosecuting and imprisoning leaders for rosewood trafficking as well as associated crimes, and dismantling networks including corrupt officials;
- b. Focus efforts on reestablishing law and order in the most affected areas, including

- by ensuring law enforcement personnel have sufficient resources to carry out their obligations;
- c. Target the illicit financial flows of illegal actors, with the assistance of foreign banks and governments, with a view to recovering lost assets and revenue;
- d. Request the full support of international partners including the World Bank, CITES, INTERPOL, and others;
- e. Demonstrate complete transparency by releasing all relevant reports and involving the local NGO community closely in the decision making process regarding the rosewood trade.

3. GOVERNMENTS OF CHINA AND HONG KONG

- a. Must immediately enact implementing legislation to match its CITES commitments, including with respect to all Appendix II listings of *Dalbergia* and *Diospyros*;
- b. As the CITES representative party, China must take responsibility to ensure Hong Kong immediately takes these actions.

4. GOVERNMENTS OF TANZANIA AND ZANZIBAR

- a. Must immediately enact implementing legislation to match its CITES commitments including with respect to all Appendix II listings of *Dalbergia* and *Diospyros*;
- b. As the CITES representative party, Tanzania must take responsibility to ensure Zanzibar immediately takes these actions.

5. OTHER TRANSSHIPMENT COUNTRIES

- a. Work together with INTERPOL, CITES, and the Lusaka Task Force to share evidence from investigations;
- b. Prevent any transshipments of rosewood or ebony of Malagasy provenance.

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