The rosewood crisis has been devastating West African forests and the livelihoods of its people for almost a decade. Illegal and unsustainable trade in *Pterocarpus erinaceus* (*P. erinaceus*) has persisted despite the listing on Appendix III and then II of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). Recent reports commissioned by or addressed to the CITES Secretariat, have shed light on expanding regional exploitation for international trade in violation of the Convention. EIA’s new analysis, based on CITES trade data from 2016 to 2020, indicates a discrepancy of close to 2 million tons between quantities reported by exporters and importers. Importers have reported more than double the quantity reported by exporters.

The rosewood traffic in Mali is yet another example of the regional crisis. Since 2018, Mali has suffered two military coups, while the country has become one of the largest suppliers of rosewood to China, through the export of *P. erinaceus*. The relentless timber poaching in the southern forests of Mali has resulted in a significant decline of the species in multiple areas. EIA’s research indicates that the international trade in *P. erinaceus* in its current form has continuously been prohibited in Mali since May 2020, via a harvest ban in effect from May 2020 to March 2021 and a log export ban regulation effective since February 2021. From May 2020 to January 2022, EIA estimates that China has imported over 123,400 tons of *P. erinaceus* from Mali - equivalent to approximately 4,500 containers, 365,900 logs, or 182,900 trees - in breach of Malian laws.

The situation in Mali and more broadly in West Africa calls for an urgent response, which should build on the lessons learned from other range States and the precedent set by the trade suspension in Nigeria. EIA recommends: (1) a consolidated Article XIII review for exporters - including Mali - and importers involved in the trade since 2016; (2) a regional trade suspension for all range States unless a scientifically robust non-detriment finding has been approved and legal acquisition findings are made prior to export; (3) effective support provided for wildlife crime enforcement and governance initiatives in West Africa.
BACKGROUND

The insatiable demand for hongmu or “red wood,” a rare and valuable category of rosewood used primarily for antique-style furniture in China, has resulted in a sharp decrease in wild rosewood populations globally.1 Primarily sourced from Southeast Asia prior to 2010, the exhaustion of these forests has led to the rapid expansion of trafficking networks into new frontiers in Africa and Central America.2 Since 2015, West Africa has become the world’s top hongmu producing region, accounting for the majority of all hongmu log and sawn wood imports into China by quantity between January 2015 and December 2021 (Figure 1).3 According to EIA’s supply chain investigation and intelligence gathering, P. erinaceus, also known in the region as “kosso,” “keno,” or “bois de vêne,” has been by far the primary target of the hongmu trade between West Africa and Asia.4,5

In an attempt to curb the fast growing and largely informal international trade in P. erinaceus, African governments – in addition to instituting domestic measures like harvest and transport bans – joined forces in 2016 and collectively obtained the listing of the species on Appendix II of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), which took effect in January 2017.6

A REGIONAL CRISIS WITH A SUSPENSION PRECEDENT

Figure 2 offers an overview of the evolution of the total import of P. erinaceus by China (in value) and its origin from January 2010 to December 2021. Between January 2019 and December 2021, China has imported massive quantities of P. erinaceus from Sierra Leone (673,000 tons), Ghana (260,000 tons), Mali (232,000 tons), and The Gambia (189,000 tons).7 As of the 25th Meeting of the Plants Committee in June 2021, none of these countries had produced a scientifically robust non-detriment finding.8 The August 2019 report commissioned by the CITES Secretariat, and prepared by the United Nations Office on Drugs and Crime (UNODC), establishes that “very few countries in West and Central Africa have the capacity for making robust scientific-based non-detriment findings, no range State of P. erinaceus demonstrated that the provisions of Article IV were being met.”9

According to EIA’s investigations in Ghana, The Gambia, and Mali (see paragraphs below), the situation in these countries is reminiscent of the unreliable implementation of the Convention in Nigeria, prior to the trade suspension of P. erinaceus.10,11 The Secretariat’s conclusion following its field visit in Nigeria, can be equally applied to the current trade from other range States:

Figure 1
China imports of hongmu from the world, by weight
Source: EIA, based on Chinese customs data from the Trade Data Monitor.
Figure 2
China imports of hongmu from West Africa, in value
Source: EIA, 2022 based on Chinese customs data from the Trade Data Monitor.

Figure 3
Discrepancy between reported import and export of P. erinaceus, logs and sawn wood, from 2016 to 2020, volume converted to weight
Source: EIA, 2022 based on CITES trade database
“[T]he Secretariat reminded the Nigerian Authorities that the issuance of an export permit provides a certification that the specimens it refers to have been legally acquired. The decisions of governmental authorities of other countries to authorize imports and issue re-export certificates are based upon these documents. It is imperative that such determinations be made in compliance with CITES and be accurate and reliable. Otherwise, the authentication of CITES permits is a mere paper exercise that does not prove legality nor sustainability which are the two key objectives of the Convention” [emphasis added].12

TRAD E DISCREPANCY RED ALERTS

The comparative analysis of the trade data, based on the CITES trade database, provides further insight into the glaring irregularities of the international trade in *P. erinaceus*. According to the database, direct trade for commercial purposes only occurred from eight range States in West Africa between 2016 and 2020, namely Benin, Burkina Faso, The Gambia, Ghana, Guinea-Bissau, Mali, Nigeria, and Sierra Leone. Direct imports from range States of *P. erinaceus* have only been reported by China and Vietnam.

The discrepancies between the quantity declared as imported by China and Vietnam versus the quantity declared as exported by West African countries are substantial and raise serious concerns (Figure 3). Between 2016 and 2020, importing countries report a total of 3.5 million tons (logs and sawn wood) while exporting countries report 1.5 million tons (logs and sawn wood), i.e. a discrepancy of nearly 2 million tons.13,14 Importers have reported more than double the weight reported by exporters.

PREYING ON MALIAN FORESTS

Mali’s exports of *P. erinaceus* to China accelerated in the first quarter of 2017, when the Appendix II listing of the species came into force, and has since been increasing (Figure 4).

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Figure 4
China imports of hongmu from Mali, in value

Source: EIA based on the Trade Data Monitor

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Environmental Investigation Agency
The forests where *P. erinaceus* naturally grows in Mali are located in the three southern regions, Kayes, Koulikoro, and Sikasso. According to EIA’s findings, logging teams first ransacked the forests (Sikasso, Bougouni, and Yanfolila areas) located at the border with Burkina Faso and Côte d’Ivoire in the Sikasso province, between 2013 and 2015. Once commercial trees became scarce, the exploitation moved north toward Koulikoro, Kita and Kangaba forest areas (Koulikoro region) from 2015 to 2018. Since 2018, logging squads have focused on the last remaining wild populations of *P. erinaceus* located in the Malian regions bordering Guinea and Senegal, specifically Kenieba, Didjan, and Fadougou forest areas (Figure 5).

Illegal exploitation of *P. erinaceus* has reportedly also taken place in protected areas, as the wild populations became scarce, in particular in the Monts Manding and the Kenieba-Baoulé forest reserves. These forested areas were intentionally set aside several decades ago, with the support from local populations, for preservation and controlled use. Reports also indicate illegal logging taking place in cemeteries, against the will of local communities.

In May 2020, in order to regain control over the chaotic exploitation of the southern forests, the former Malian minister of environment, sanitation, and sustainable development officially suspended the commercial exploitation of *P. erinaceus*. As stated by the ministry “All lumber and sawn wood exploitation activities are suspended in all their forms until further notice, on all national territory.” The decision was reportedly widely popular, supported in particular by local communities and artisans.

The suspension remained valid until Bernadette Keïta, then minister of environment, sanitation, and sustainable development, lifted it in March 2021. The decision was criticized by multiple local associations from Kayes, Koulikoro, and Sikasso provinces (Figure 7).

Since 2018, Malian civil society organizations, whistleblowers, and local artisans have publicly denounced the legal loophole used by international traders to export squared *P. erinaceus* logs in breach of the national log export ban. The Malian forest code prohibits the export of “non-processed timber,” per article 39 (provision reinforced by the interministerial decree 2015-1535/CI/MEF-SG of June 5, 2015). However, the lack of definition regarding what does and does not constitute processed timber was used for several years by traders to defend the legality of the export of squared logs, which is the form under which *P. erinaceus* has exclusively been exported from Mali according to EIA’s investigation. The loophole was eventually closed in February 2021 when an interministerial decree established that square logs are not sufficiently processed products and therefore not allowed for export (Figure 6).

EIA’s research indicates that international trade in *P. erinaceus* in its current form has continuously been prohibited in Mali since May 2020, via a harvest ban in effect from May 2020 to March 2021 and a log export ban regulation effective since February 2021. During this same period, EIA estimates that China has imported over 123,400 tons of *P. erinaceus* from Mali - equivalent to approximately 4,500 containers, 366,900 logs, or approximately 182,900 trees.
Figure 6
Regulation re-affirming the national log export ban and the prohibition to export square logs from Mali
Source: MEADD, 2021
CONCLUSION AND RECOMMENDATIONS

Illegal trade in Pterocarpus erinaceus is a problem that predates its listing on CITES Appendices III and II. Unsustainable and illegal trade has continued since the CITES listing in 2016. In addition to being the only species considered for the Review of Significant Trade at the virtual 25th Meeting of the Plants Committee in June 2021, based on CoP Decision 18.92 and the urgent need to address unsustainable trade, the Plants Committee also referred illegal trade issues to the 74th Meeting of the Standing Committee. Due to the significant ongoing issues with legality of trade in P. erinaceus, EIA recommends the following to SC74:

1. **Consolidated Article XIII review for exporters - including Mali - and importers involved in the trade since 2016.** Due to the continued widespread illegalities in the trade, the Standing Committee should request the Secretariat to undertake a consolidated Article XIII review for P. erinaceus, to include the ongoing compliance investigations and Article XIII reviews of Guinea, Mali, Nigeria, and Vietnam, as well as other major exporting and importing Parties (Benin, Burkina Faso, China, Gambia, Ghana, Guinea-Bissau, and Sierra Leone).

2. **Regional trade suspension for all range States unless a scientifically robust non-detriment finding has been approved.** To respond to PC recommendation to the SC in SC74 Doc. 35.2.1 paragraph 15(b) to address illegal trade, the Standing Committee should recommend a suspension in trade of this species until exporting Parties make non-detriment findings and legal acquisition findings to ensure trade in compliance with the Convention to the satisfaction of the Plants Committee and Standing Committee.

3. **Effective support to wildlife crime enforcement initiative in West Africa.** The SC should support draft decisions in Annex 1 and 2 of SC74 Doc. 35.3 on Wildlife crime enforcement support in West and Central Africa for consideration by the Parties at the 19th Conference of the Parties.

**Figure 7**
Communities in the Kayes region rise against the anarchic logging of *P. erinaceus*.
3. EIA’s analysis based on Chinese customs data obtained from the Global Trade Atlas (GTA).