



China's Log Imports from Countries with Log Export Bans: Trade Trends and Due Diligence Risks

China has imported more than 46 million cubic meters of logs from countries with log export bans from 2005 to 2016. Many of these imports are in violation of log export bans (LEBs) and present a risk to Chinese companies – and their down-stream buyers of processed wood products in North America and Europe – that these logs are illegally sourced.

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July 2018

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Overview

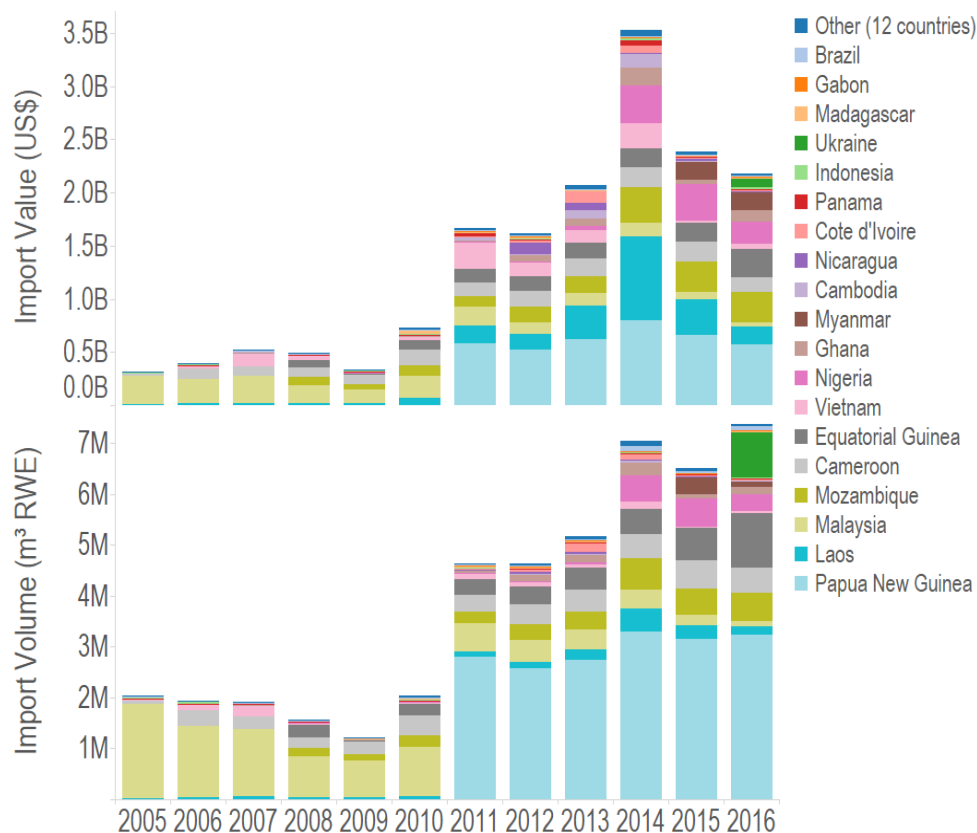
Between 2005 and 2016, Chinese companies imported more than US\$16 billion of logs from 31 countries with either full or partial log exports bans (LEBs). This amounted to 20% of China's total imports of logs from all countries around the world.

Logs sourced from a country with a *full* LEB policy are likely to be considered illegally sourced. Logs imported from countries with *partial* LEB policies should signal the need for additional risk assessment and mitigation actions to ensure that they did not violate the specific aspects of each exporting country's LEB policy.

To put these trade flows in recent global context, from 2011 to 2015:¹

- China imported US\$11.3 billion in logs from LEB countries. China's imports from LEB countries have been growing from a low of US\$1.6 billion in 2012 to a high of US\$3.5 billion in 2014 (Figure 1).
- Europe, Australia, and the United States *combined* imported only US\$200 million from LEB countries. Europe's log imports from LEB countries have been declining in the five-year period from 2011 through 2015—from US\$65 to US\$25 million per year.

Figure 1: China's Log Imports from Countries with Full or Partial Log Export Bans, 2005-2016
(Aggregate Value and Volume by Year)



¹ Comparable data from Europe, the USA, and Australia were most readily available for 2011 through 2015.

As mentioned before, it is important to note that not all log imports are necessarily in violation of LEBs: while most LEBs are full export bans, others are partial, applying only to certain tree species, wood types, or subnational regions of harvest. Because each LEB is different in its scope, one cannot merely judge all logs from LEB countries as illegal without additional due diligence research. However, the presence of a log export ban signals a need for additional risk assessment and mitigation actions to ensure that log imports are not violating the specifics of countries' log export bans.

Therefore, trade data showing imports of logs from LEB countries should be taken as a starting point for deeper scrutiny of the types of logs that are being imported in particular supply chains, and whether or not these imports violate the specific LEB prohibitions from the various source countries. In the US, Europe, and Australia, regulated market transactions involving logs in violation of a LEB policy from the country of harvest are within the scope of the US Lacey Act, the European Union Timber Regulation (EUTR), and the Australian Illegal Logging Prohibition Act (ILPA). As such, logs as well as finished timber products imported into these markets from manufacturing hubs such as China are at risk of legality violations, if these products originated as logs imported into China in violation of a LEB.

Box 1. Methodology

To identify potentially high-risk flows of logs, Forest Trends analyzed Chinese log imports from 31 countries with some form of a log export ban over the period 2005-2016. The methodology involved analyzing China Customs data on imports categorized under HS Code 4403 (wood in the rough, or roughly squared).

As of June 2017, the World Resources Institute (WRI) lists 35 countries with some form of a log export ban. However, for purposes of this study, log exports from Canada, New Zealand, and the USA were not included (given their high forest governance capacity and low risk of illegal exports), nor did we include log exports from Albania (China Customs did not report imports from Albania), or from China itself. This study, therefore, looks at log imports from the remaining 30 countries plus Equatorial Guinea which is not included on the WRI list, but which has had a LEB in place since 2007.

Except where otherwise noted, the data reported include only log imports from countries starting the year *after* the enactment of the country's LEB policy to ensure that all log imports fell within the implementation period of the LEB.

*The data reported above on log imports from LEB countries into Europe, USA and Australia are taken from a related Forest Trends Publication: Forest Trends. 2017. "European, US, and Australian Markets Are Still Importing Logs from Countries with Full or Partial Log Export Bans." https://www.forest-trends.org/wp-content/uploads/2017/03/Information-Brief-LEB-Data-Analysis_Final-2-13-17-FINAL_REV.pdf

Background

Even as demand for timber and timber products continues to grow both in China and globally, the Chinese government is placing increasingly strict regulations on its own domestic timber harvesting in an effort to safeguard its remaining natural forests. China has banned commercial logging in all natural forests by 2017 in an extension of ambitious programs which were started in 1998, with the purpose of allowing forests to recover from decades of over-logging and helping to restore forest ecosystems and their resilience.² These twin pressures of increasing demand and shrinking domestic supply are resulting in the growth of China's timber imports—a trend which is only expected to continue in the years ahead.

China is rapidly expanding its timber plantations, but hardwood species used for flooring, furniture, and veneer are difficult to supply through domestic plantation production. China's plantations will not be capable—either now or in the immediate future—of sourcing the quantity of high value hardwood timber needed to meet current and expected demand.³ Hardwood timber import demand in particular is therefore expected to grow.

Box 2. What is a Log Export Ban (LEB)?

Over the past several decades, more than 30 countries – most in tropical timber producing areas – have enacted policies to restrict or prohibit the export of raw logs.* Log export restrictions range from comprehensive bans on all raw or crudely processed logs, to more narrow, partial bans targeting certain types of timber, specific tree species, or distinct regions of harvest within a given country. In some countries, the wording of the LEB policy may be ambiguous or difficult to interpret, and in some cases exemptions can be granted by government officials under special circumstances.

The aim of log export ban policies has in many cases been both economic and environmental. Requiring timber to be processed in-country before it is being exported creates jobs and enables higher sale prices (and taxes) for the semi-processed or finished wood products. It is also more difficult for illegal timber harvesters to “cut-and-run” with raw logs stolen from a country's forests when a log must be transported to a domestic mill, where nearby roads and checkpoints can be more closely monitored. Log export bans are also often politically easier to implement than addressing the more difficult issues that may be contributing to illegal logging or the under-development of a country's domestic timber industry (e.g., corruption, lack of investment).

Despite their seeming simplicity, log export bans are difficult to enforce for various reasons, ranging from the low capacity of government agencies to outright fraud and corruption within one or multiple links along the supply chain. Due in part to these enforcement challenges, logs often continue to be exported from countries with full or partial LEB policies in place, in many cases in violation of these policies.

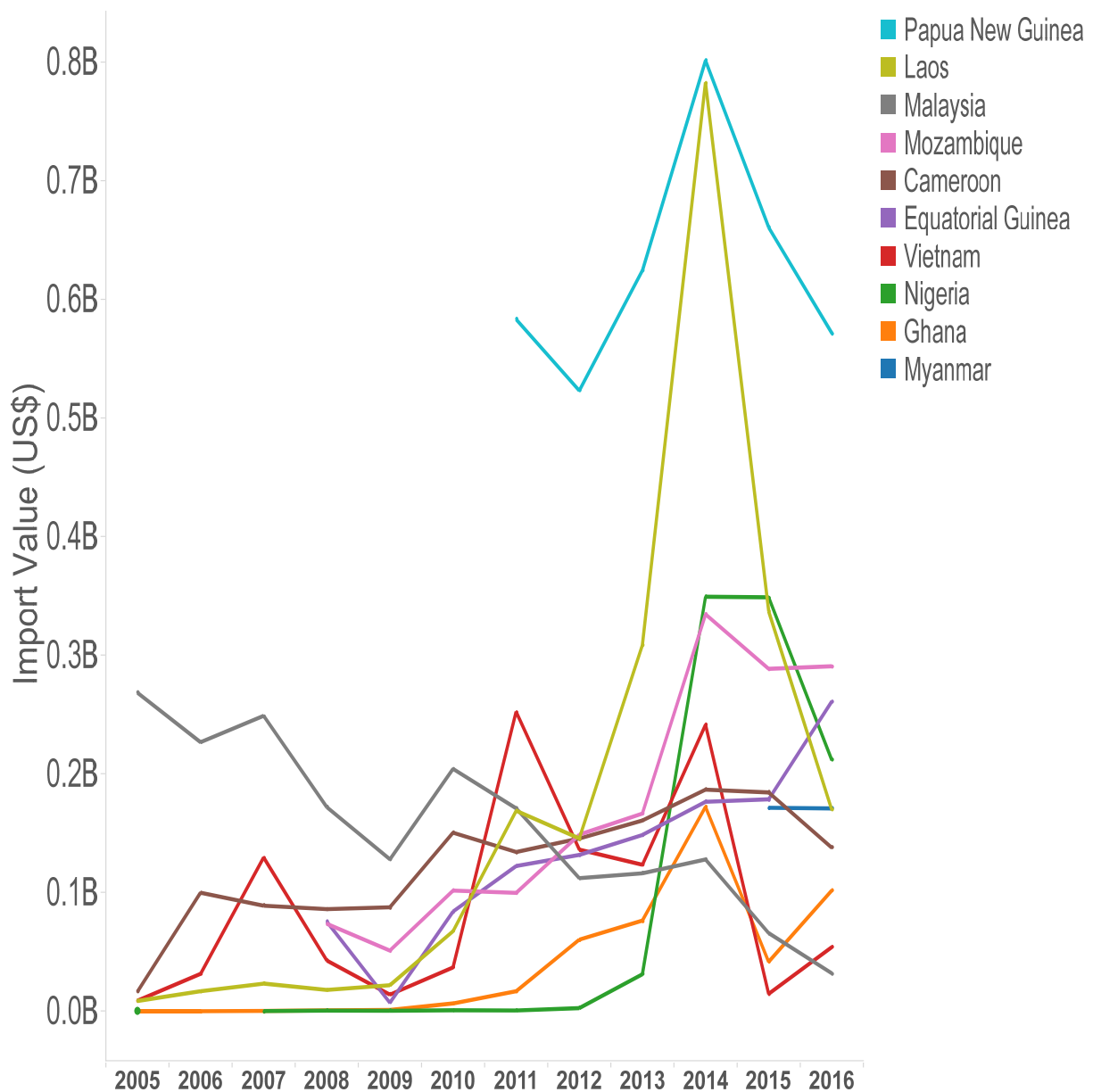
* The World Resources Institute's research into the 30+ LEBs provide specific details concerning each national LEB policy. See here for the full list: <http://www.forestlegality.org/content/logging-and-export-bans>

² Xiufang Sun, Kerstin Canby, and Lijun Liu. 2016. “China's Logging Ban in Natural Forests: Impacts of Extended Policy at Home and Abroad”. Forest Trends. http://www.forest-trends.org/documents/files/doc_5145.pdf.

³ Ibid. p. 4.

(6) China's LEB-country log imports (by value) are sourced from only eight key countries. Log imports from Papua New Guinea comprised 23% of total LEB imports – or US\$3.8 billion of the total \$16.2 billion. Seven countries (Laos, Malaysia, Mozambique, Cameroon, Equatorial Guinea, Vietnam, Nigeria) each provided between US\$1-2B in log value (together comprising 63% of combined total value). Twenty-three countries each provided less than US\$500M in log value (together comprising 14% of combined total value)—over the period 2005-2016 (Figure 2 and Figure 3).

Figure 3: China's Log Imports from Countries with Full or Partial LEBs, 2005-2016
(Annual Value for Top Ten Countries)



* Missing data for any country in a given year indicates either that the country's LEB policy may not have been in place for that full year—so the data was excluded for this analysis—or that no data was reported by China Customs for that country and year.

- (7) The reported average value of log imports from LEB countries grew until 2014, when average value fell significantly.** Growth in value outpaced growth in volume for log imports from LEB countries from 2005 through 2014—with average value climbing from US\$156 per m³ roundwood equivalent (RWE) in 2005 to US\$500 per m³ RWE in 2014. This trend indicates that China was either importing increasingly valuable timber over time, or progressively improving the quality of its customs import data reporting to more accurately reflect the value of the timber it was importing (since high quality timber has historically been under-valued at export in order to avoid export taxes). This trend, however, reversed in 2015, and reported average value fell significantly to US\$295 per m³ RWE by the end of 2016. This reversal appears to be in part due to lower-reported average value of log imports from Papua New Guinea and Equatorial Guinea, and a profusion of comparatively low-value softwood imports from Ukraine in 2016. In the case of Ukraine, the sudden increase may have been in expectation of an expansion of Ukraine's LEB to cover softwoods starting in 2017 (Figure 1).
- (8) While Papua New Guinea provided the largest share of logs to China of any LEB country, the reported value of those logs is significantly lower than the average reported across all countries.** Log imports from Papua New Guinea (2011-2016) represented 39% of the volume of all log imports from LEB countries to China over the period 2005-2016, but only 23% of the value, indicating that either the logs being imported from Papua New Guinea are truly of less value, or their value is being under-reported.
- (9) African countries make up a large portion of China's total log imports from LEB countries.** The eight African LEB countries together accounted for 27% of the volume and 36% of the value of all log imports from LEB countries over the period 2005-2016. Gabon, one of the top suppliers of logs to China from 2005 through 2010, stopped supplying logs almost completely after 2010 when the country instated its LEB policy. However, this decline was replaced over time by growing imports from Mozambique, Cameroon, Equatorial Guinea,⁴ Nigeria, Ghana, and Cote d'Ivoire from 2011 through 2016.
- (10) Log Export Ban policies appear to have been more effectively implemented and enforced in some countries than others.** China's log imports from Myanmar and Gabon were drastically reduced following each country's enactment of an LEB policy, in 2014 and 2010 respectively (Figures 5 and 6 below), while LEB policies in Papua New Guinea and Malaysia have not led to similarly abrupt reductions in those countries' log exports to China (Figures 4 and 8 below).

⁴ Equatorial Guinea's LEB instated in 2007 appears to have been somewhat effective for only its first two years of implementation (2008 and 2009), after which log exports began steadily rising from 2010 through 2016.

Country-Specific Analysis

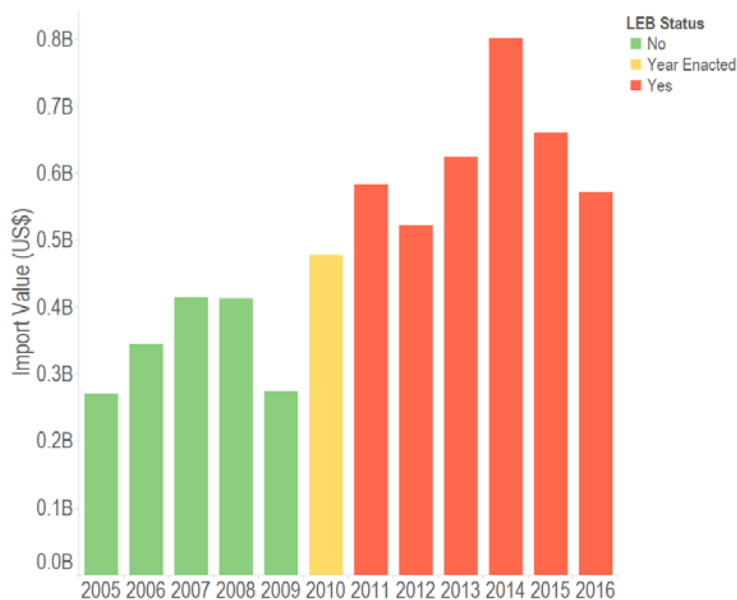
This section looks at log imports from LEB countries in years prior to and after the enactment of their LEBs, which enables analysis concerning impacts of the LEB policies.⁵

Papua New Guinea

Since 1990, Papua New Guinea (PNG) has banned the export of fifteen specific timber species in log form, citing conservation concerns. In addition, all log exports are prohibited from concessions allocated after 2010. Logs from concessions given before 2010 are permitted to be exported. Most of the logs currently exported from PNG originate from areas designated by the PNG government as Special Agricultural Business Leases (SABL).⁶ The trade links directing logs from PNG to China are remarkably strong. Global Witness estimates that 90% of PNG's log exports are bound for China; one out of every three tropical logs imported into China comes from PNG; and one out of every ten tropical logs entering China comes from a SABL in PNG.⁷ Log imports into China from Papua New Guinea over the period 2005-2016 totaled US\$6 billion.

In interpreting Figure 4 below (and indeed all PNG data in Figures 1-3 above), it is important to note that logs imported after 2010 could be originating from concessions given prior to 2010, and therefore not in contravention of Papua New Guinea's LEB policy. Trade data analysis does not readily reveal the specific concessions from which log exports originate, or year in which logs were harvested.

Figure 4: China's Log Imports from Papua New Guinea



⁵ This methodology of including log imports from LEB countries in years prior to the enactment of the LEB policy is only utilized in this country-specific-analysis section of this Policy Brief, and not in the preceding analysis.

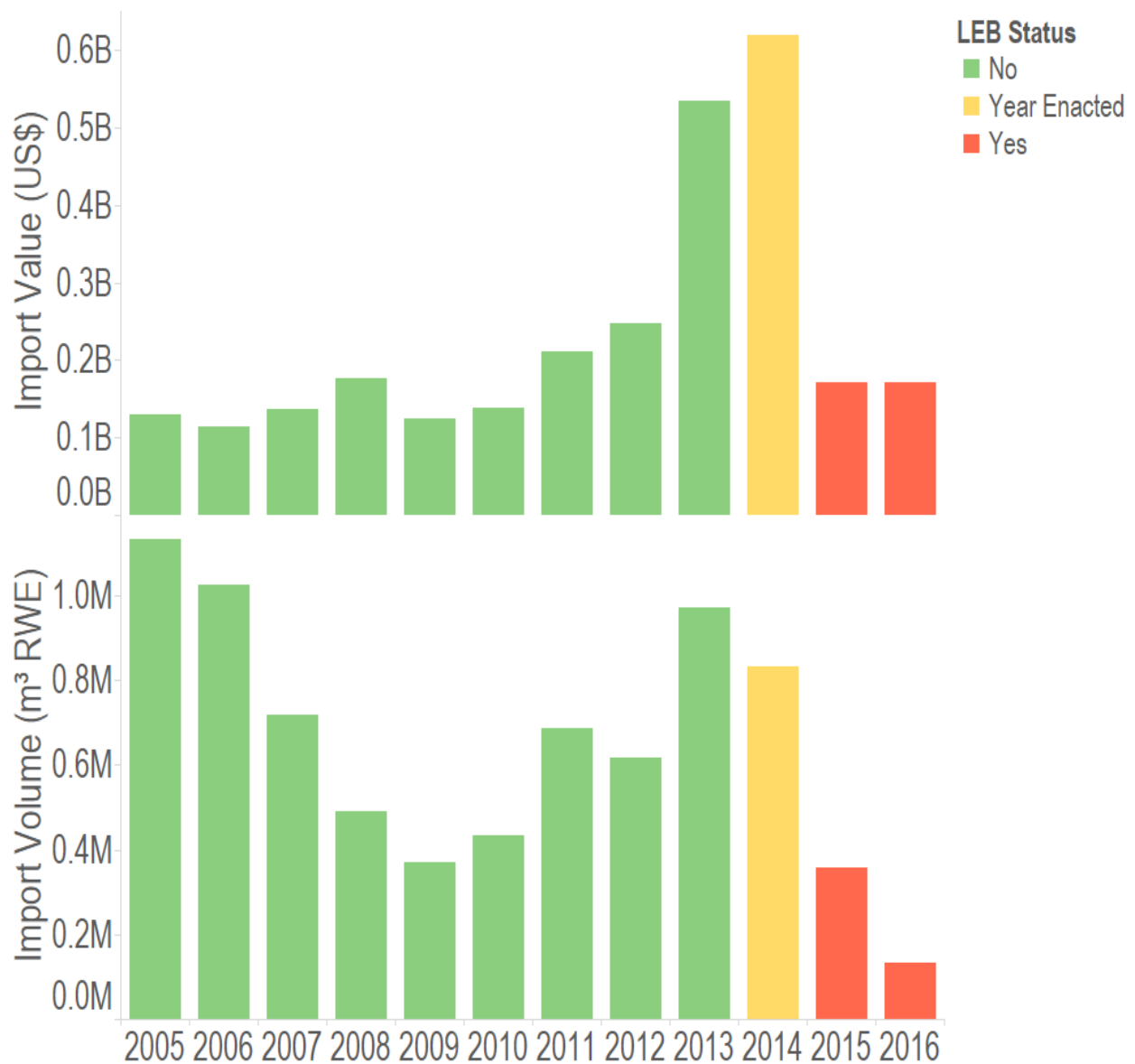
⁶ In addition to concerns about violations of the LEB policies, there have been significant concerns about the constitutionality of these SAB Leases. In total, 12% of the country's land area has been placed under this SABL designation, which allows for widespread forest clearing and conversion. Allegations of corruption and fraud under this system have created legal ambiguity concerning the constitutionality and validity of these leases, and the PNG government has responded by committing to cancel most of the leases, although it has not yet followed through on this commitment.

⁷ Global Witness, 2017. Stained Trade: How U.S. Imports of Exotic Flooring from China Risk Driving the Theft of Indigenous Lands and Deforestation in Papua New Guinea. p. 5-6. Available at: <https://www.globalwitness.org/en/campaigns/forests/stained-trade/>

Myanmar

In April of 2014, the government of Myanmar issued a ban on the export of all raw logs, aimed at slowing the flow of illegal timber from the country and fostering the development of domestic industry. China's log imports from Myanmar fluctuated between US\$100-US\$250 million annually from 2005 through 2012, before rising sharply to US\$535 million in 2013 and US\$619 million in 2014. Following the 2014 LEB announcement, log import values dropped to US\$170 million annually for 2015 and 2016, and the volume of log imports declined even more rapidly, to the lowest levels of the decade by 2016—indicating that logs were still being exported. Nonetheless, the LEB does seem to be having an impact in terms of reducing the value and particularly the volume of logs exported.⁸

Figure 5: China's Log Imports from Myanmar by Volume and Value

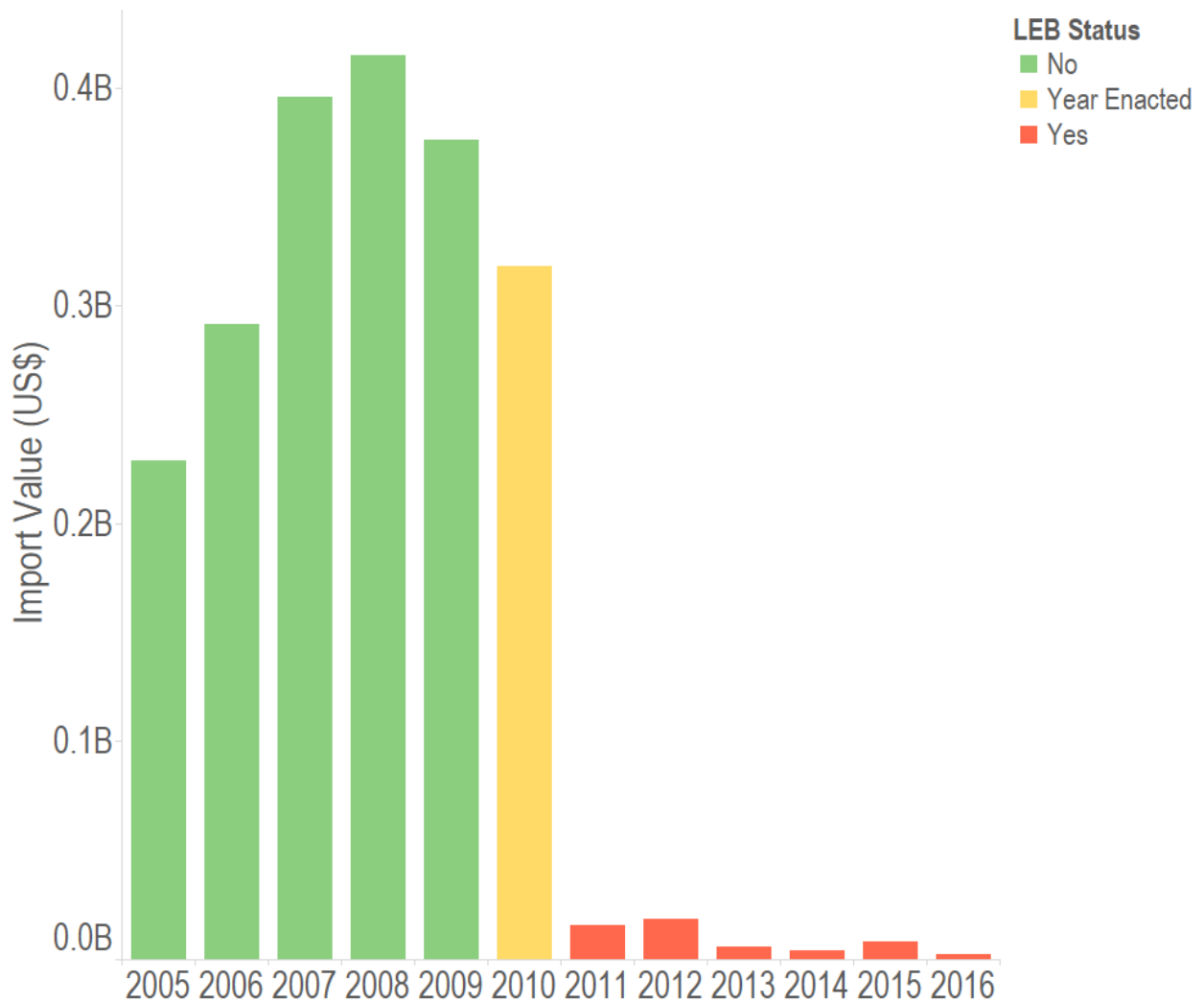


⁸ It is also important to note that in the summer of 2016, the government of Myanmar instated a yearlong ban on all logging activity, although sales of stockpiled timber continued.

Gabon

Since 2010, Gabon has had in place a comprehensive export ban on logs which appears to apply to all timber species. From 2005-2010, prior to the enactment of the LEB, Gabon was the leading source of logs to China from all African countries. However, beginning in 2011 Chinese log imports from Gabon dropped off precipitously and have remained low through 2016, indicating that the ban appears to have been quite effectively enforced.

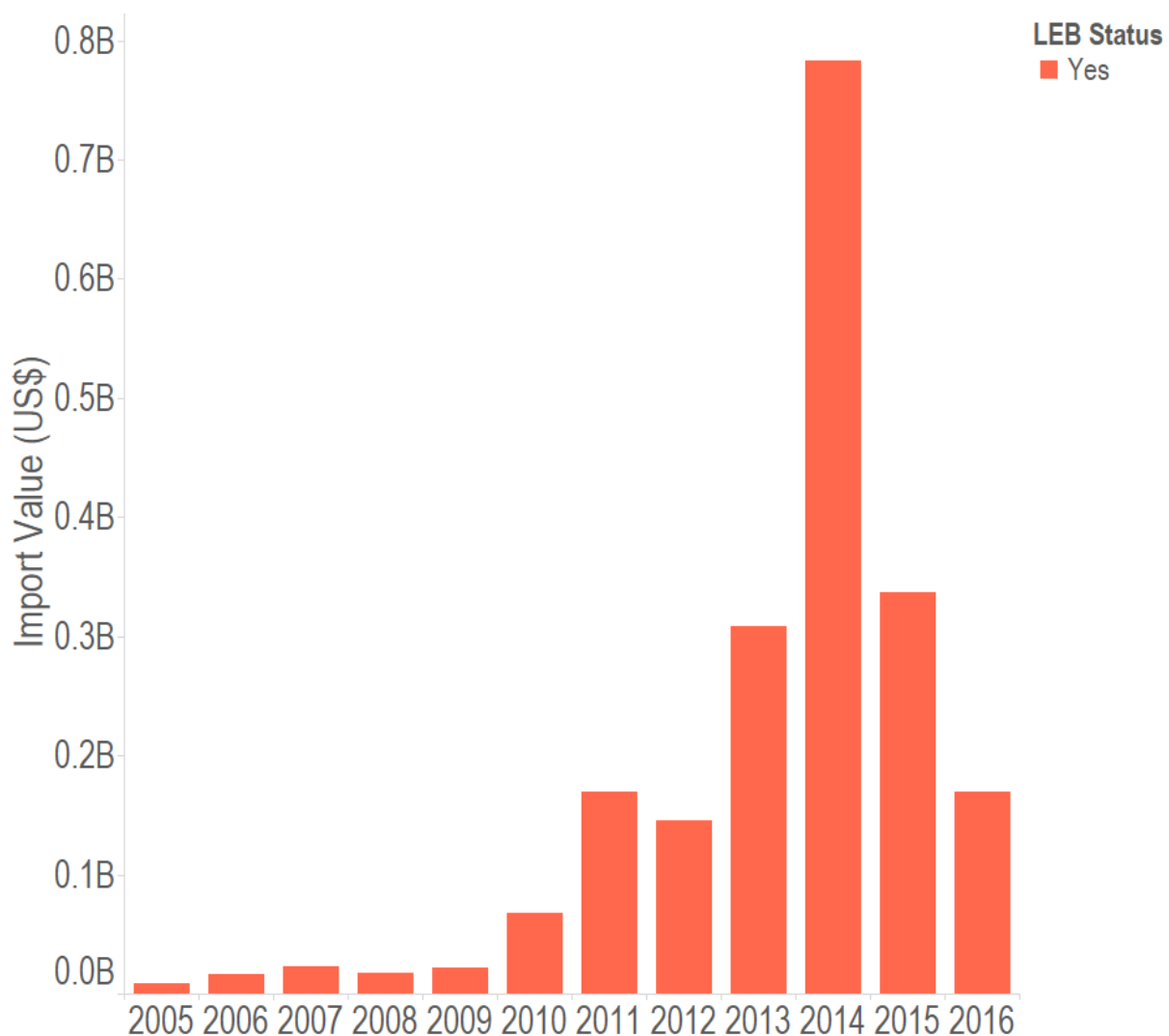
Figure 6: China's Log Imports from Gabon



Laos

While Lao PDR appears to have had a log export ban legally in place since 1999, the government announced in 2015 its intention to begin enforcing the LEB, with the aim of boosting the domestic timber processing industry. Chinese log imports from Laos grew steeply from 2010 through 2014, before declining in 2015 and 2016 just as steeply as they had previously been growing. The log export ban re-announced in 2015 appears to exempt plantation-grown logs, so the presence of continuing exports in 2016 cannot be taken as automatic proof of LEB violation. Further due diligence would be needed to determine whether the logs being exported in 2016 were plantation grown, or whether they in fact originated from natural forest areas. It should also be noted that in May 2016, the government enacted a Prime Ministerial Order (PM15) to ban the export of sawn-wood in addition to the already-existing ban on log exports.⁹

Figure 7: China's Log Imports from Laos

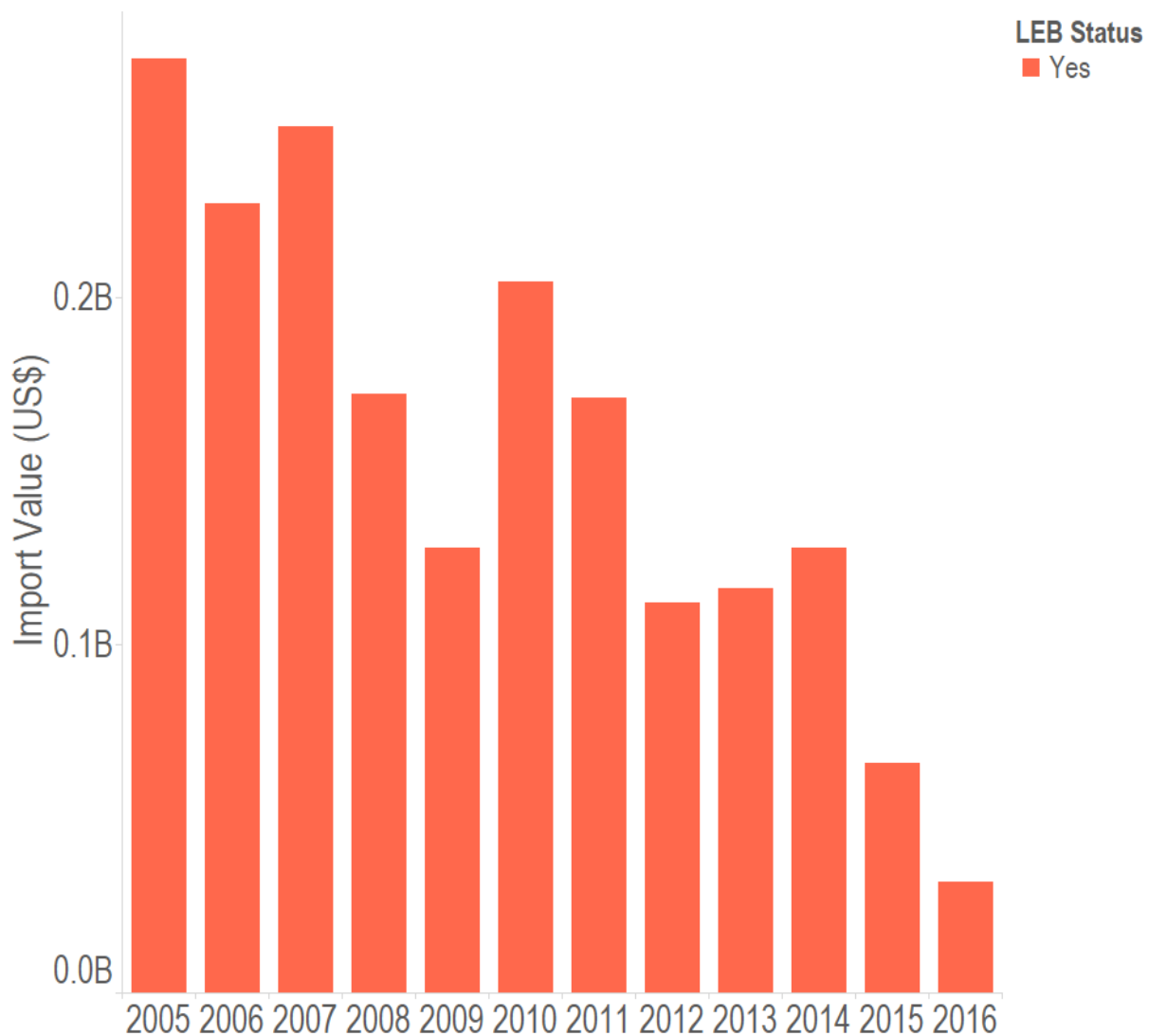


⁹ Phuc Xuan To and Kerstin Canby. "Laos Log and Sawnwood Export Ban: Impacts on the Vietnam–Lao Timber Trade." Forest Trends. http://forest-trends.org/publication_details.php?publicationID=5515.

Malaysia

The export of logs from the eleven states and two federal territories located on the Malay Peninsula, collectively called Peninsular Malaysia, is prohibited with limited exceptions. However, there has been no log export bans from Malaysia's two states located on the island of Borneo: Sabah and Sarawak; thus, a large proportion of the country's tropical log exports have originated in these two Malaysian states. The federal government has attempted in the past to put in place temporary log export bans on these states, but these bans do not appear to be in place at the present time. Log imports to China from Malaysia totaled US\$1.9 billion from 2005 through 2016. However, China's log imports from Malaysia declined steadily over the period, from a high of US\$269 million in 2005 to US\$32 million in 2016.

Figure 8: China's Log Imports from Malaysia



* It is important to note that logs imported from Malaysia may have originated from Sabah and/or Sarawak, which do not have comprehensive LEB policies in place. Determining the legality status of these log exports would therefore require more detailed and case-specific analysis.

Recommendations

Verifying the Legality of Log Imports from Log Export Ban Countries

The analysis of trade statistics represents only a starting point for further investigation of specific log imports into China from countries with log export ban policies. Digging deeper into trade flows will reveal that the imports either do in fact fall within a window of exemption under the export country's partial LEB policy, *or* are in fact violating the terms of a LEB policy. Experience over the past 18 months in analyzing trade data and digging deeper into specific import flows has shown the importance of this additional investigation. This can include:

- (1) Verifying proper HS coding:** One obvious but nonetheless important factor to consider would be to verify that the trade data are properly coded. Products classified as 'logs' (HS 4403) are sometimes misclassified and are instead a more processed form of timber which should have been assigned a different HS code. In cases when further investigation reveals that the imports in question do not actually fall under HS 4403, these imports would then be exonerated as potential LEB violations. HS code entry errors are known to happen, and in all likelihood some portion (likely small) of the US\$16B in log imports from LEB countries to China from 2005-2016 may in fact have been misclassified as logs.
- (2) Considering exemptions that allow for log exports despite the presence of a LEB:** For imports verified to have been correctly classified as logs, it is possible that they may fall within the windows of exemption that many partial LEB policies include. Three of the most common categories of exemption are tree species, harvest location, or time of harvest—that is, whether or not the LEB policy was in effect at the time the logs were harvested or exported. Log imports from countries with full or partial LEBs may in fact be legal if: the logs are of a species which is exempt from the exporting country's LEB policy; the logs were harvested from a subnational region within the exporting country which allows for log exports; or if the log exports occurred before an exporting country's LEB policy went into effect.

If further research reveals the imports to be logs (HS 4403) which are of a species and subnational region of harvest covered by a log export ban, then one can reasonably determine these imports to have a high likelihood of being in violation of the LEB policies in place in the country of origin. Furthermore, if processed wood products originating from these logs are at any point exported from China to the USA, Australia, or countries within the European Union, these imports would then be in violation of the Lacey Act, the ILPA, or the EUTR, and companies importing these wood products could be subject to enforcement action.

Annex: Complete Data Table

**Table 1: China's Log Imports from Countries with Full or Partial LEBs, 2005-2016
(Annual and Total Value by Country, US\$ Million)**

	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	Grand Total
Papua New Guinea							\$583.48 M	\$523.34 M	\$624.73 M	\$801.85 M	\$661.04 M	\$571.91 M	\$3766.35 M
Laos	\$8.59 M	\$16.81 M	\$23.26 M	\$17.91 M	\$21.86 M	\$67.46 M	\$169.05 M	\$145.71 M	\$308.75 M	\$783.26 M	\$337.24 M	\$169.69 M	\$2069.59 M
Malaysia	\$268.6 M	\$226.85 M	\$249.09 M	\$172.1 M	\$128.06 M	\$204.35 M	\$171.06 M	\$112.18 M	\$116.26 M	\$127.9 M	\$65.83 M	\$31.93 M	\$1874.20 M
Mozambique				\$73.74 M	\$51.13 M	\$101.68 M	\$99.77 M	\$148.89 M	\$166.63 M	\$334.71 M	\$288.74 M	\$290.92 M	\$1556.22 M
Cameroon	\$16.35 M	\$99.96 M	\$88.94 M	\$86.04 M	\$87.65 M	\$150.51 M	\$134.25 M	\$145.61 M	\$160.82 M	\$186.8 M	\$184.49 M	\$137.84 M	\$1479.25 M
Equatorial Guinea				\$75.6 M	\$7.1 M	\$84. M	\$122.4 M	\$131.83 M	\$148.62 M	\$176.61 M	\$178.69 M	\$261.17 M	\$1186.02 M
Vietnam	\$8.83 M	\$31.44 M	\$129.63 M	\$42.76 M	\$13.95 M	\$36.89 M	\$252.55 M	\$136.31 M	\$123.47 M	\$241.55 M	\$14.59 M	\$53.96 M	\$1085.94 M
Nigeria	\$.01 M		\$.12 M	\$.43 M	\$.33 M	\$.78 M	\$.61 M	\$2.56 M	\$31.14 M	\$349.54 M	\$349.04 M	\$211.73 M	\$946.29 M
Ghana	\$.02 M	\$.01 M	\$.23 M	\$.65 M	\$1.01 M	\$6.53 M	\$16.82 M	\$60.36 M	\$76.41 M	\$172.24 M	\$41.62 M	\$101.76 M	\$477.65 M
Myanmar											\$171.51 M	\$170.98 M	\$342.49 M
Cambodia	\$.07 M	\$.08 M	\$16.14 M	\$5.12 M	\$6.04 M	\$4.59 M	\$21.8 M	\$15.05 M	\$71.47 M	\$125.22 M	\$6.8 M	\$3.57 M	\$275.95 M
Nicaragua	\$.07 M	\$.03 M		\$.02 M	\$.39 M	\$1.17 M	\$11.52 M	\$103.65 M	\$72.25 M	\$12.74 M	\$11.1 M	\$4.18 M	\$217.12 M
Cote d'Ivoire	\$.04 M	\$.28 M	\$.24 M	\$.3 M	\$.47 M	\$.71 M	\$3.44 M	\$17.22 M	\$109.48 M	\$62.4 M	\$12.18 M	\$6.6 M	\$213.35 M
Panama	\$.11 M	\$.36 M	\$.69 M	\$2.08 M	\$1.2 M	\$4.83 M	\$24.52 M	\$19.18 M	\$7.78 M	\$56.58 M	\$14.65 M	\$17.16 M	\$149.14 M
Indonesia	\$6.95 M	\$7.43 M	\$5.83 M	\$2.43 M	\$2.14 M	\$2.14 M	\$10.71 M	\$8.51 M	\$6.46 M	\$20.83 M	\$8.51 M	\$17.08 M	\$99.02 M
Ukraine												\$91.73 M	\$91.73 M
Madagascar	\$3.74 M	\$8.12 M	\$1.36 M	\$2.02 M	\$10.38 M	\$43.73 M	\$6.37 M	\$6.37 M	\$.16 M		\$.03 M	\$.01 M	\$82.29 M
Gabon							\$15.43 M	\$18.64 M	\$5.95 M	\$4.26 M	\$7.95 M	\$2.54 M	\$54.76 M
Costa Rica	\$.4 M	\$.01 M	\$1.04 M	\$.97 M	\$.32 M	\$1.51 M	\$1.57 M	\$4.08 M	\$3.69 M	\$10.77 M	\$7.22 M	\$7.29 M	\$38.88 M
Brazil	\$.06 M	\$.06 M	\$.31 M	\$.16 M		\$1.04 M	\$2.64 M	\$.1 M	\$3.75 M	\$13.21 M	\$5.09 M	\$8.72 M	\$36.06 M
Colombia	\$.01 M	\$.74 M	\$1.59 M	\$2.56 M	\$2.04 M	\$2.87 M	\$.97 M	\$2.21 M	\$3.38 M	\$9.6 M	\$3.21 M	\$3.16 M	\$32.34 M
Bolivia	\$.06 M	\$.7 M	\$2.32 M	\$4.72 M	\$1.93 M	\$5.75 M	\$4.79 M	\$5.5 M	\$.82 M	\$.6 M	\$.57 M	\$1.34 M	\$29.09 M
Fiji	\$.03 M	\$.04 M	\$.19 M	\$.01 M	\$.01 M	\$.06 M	\$.09 M	\$.05 M	\$12.48 M	\$14.35 M	\$.08 M	\$.004 M	\$27.40 M
Thailand	\$2.48 M	\$3.91 M	\$2.24 M	\$1.55 M	\$1.07 M	\$2.1 M	\$1.92 M	\$.47 M	\$.31 M	\$2.01 M	\$.51 M	\$.37 M	\$18.94 M
Belize									\$8.23 M	\$7.15 M	\$1.73 M	\$.7 M	\$17.80 M
Philippines	\$.005 M	\$.1 M	\$.11 M	\$.12 M	\$.8 M	\$1.57 M	\$1.97 M	\$1.91 M	\$1.96 M	\$4.74 M	\$3.2 M	\$1.02 M	\$17.50 M
Guatemala			\$.15 M	\$.06 M	\$.04 M	\$.21 M	\$2.37 M	\$3.34 M	\$.51 M	\$2.05 M	\$3.94 M	\$3.09 M	\$15.76 M
Ecuador		\$.22 M	\$.36 M	\$.61 M	\$.2 M	\$.2 M	\$1.04 M	\$.47 M	\$.4 M	\$1.98 M	\$3.81 M	\$4.37 M	\$13.66 M
Honduras								\$.13 M	\$1.17 M	\$3.49 M	\$.16 M		\$4.94 M
Peru	\$.28 M	\$.003 M		\$.07 M		\$.01 M	\$.004 M			\$.19 M	\$.83 M	\$.66 M	\$3.76 M
Sri Lanka		\$.01 M	\$.09 M	\$.02 M		\$.003 M	\$.2 M	\$.64 M	\$.14 M		\$.002 M		\$1.09 M
Grand Total	\$ 316.70 M	\$397.16 M	\$523.93 M	\$492.05 M	\$338.12 M	\$724.69 M	\$1661.33 M	\$1615.22 M	\$2067.23 M	\$3528.31 M	\$2384.37 M	\$2175.46 M	\$16224.57 M

* Empty cells indicate either no data reported by China Customs for that country and year or that the country's LEB policy may not have been in place for that full year, so the data was excluded for this analysis.