

# Wildlife Trafficking in Cameroon and Republic of the Congo

## A Scoping Review and Recommendations for Cooperation with China



A / Room 032, unit 1, foreign affairs office building,  
tower garden, No. 14, South Liangmahe Road,  
Chaoyang District, Beijing

P.C / 100600

T / 86-10-8532-5910

F / 86-10-8532-5038

E / [gei@geichina.org](mailto:gei@geichina.org)

<http://www.geichina.org>



# Table of Contents

Acronyms / 01

Introduction / 02

1.Wildlife Status and Trafficking Issues in Cameroon and Congo / 04-12

- 1.1 Pangolins in Cameroon and Congo / 05
- 1.2 Elephants and Ivory in Cameroon and Congo / 08

2.Wildlife-related Legislation and Government Authorities / 14-22  
in Cameroon and Congo

- 2.1 Cameroon / 14
- 2.2 Congo / 19
- 2.3 Summary / 22

3.Regional Initiatives on Combatting Wildlife Trafficking / 24-25

- 3.1 Central African Forests Commission (COMIFAC) and COMIFAC Wildlife Trade Enforcement Action Plan (PAPECALF) / 24
- 3.2 Extreme Emergency Anti-Poaching Plan (PEXULAB) and Emergency Anti-Poaching Action Plan (PAULAB) / 25

4.Challenges and Opportunities in Combatting Wildlife Trafficking  
in Cameroon and Congo / 27-29

- 4.1 Main Issues / 27
  - 4.1.1 Contradictions and Ambiguities in Legislation and Policies
  - 4.1.2 Lack of Updated Policies and Enforcement Capacity to Counter Wildlife Crime
  - 4.1.3 Lack of Coordination and Collaboration between Different Departments
- 4.2 Opportunities / 28
  - 4.2.1 New Mechanisms for Conservation Finance
  - 4.2.2 Existing Multilateral and Multi-stakeholder Collaboration
  - 4.2.3 Working with Countries Further Down the Supply Chain

References / 30

Appendix / 31

- I. Map of Cameroon Protected Areas, Forest Reserves, and Hunting Zones
- II. Map of Congo Protected Areas, Forest Reserves, and Hunting Zones

## Acknowledgement

We would like to give special thanks to UK’s Department for International Development (DFID) for its funding support on this project. We are very grateful of Mr. Simon Essissima from the Ministry of Forestry and Wildlife of Cameroon and Mr. Nan Jiang from the Nanjing Forest Police College of China for their invaluable feedbacks and suggestions to the report. We would also like to thank Mme. Jiaman Jin, Executive Director of GEI, Mr. Chun Li, Senior Consultant of GEI, Mr. Peng Ren, Program Manager of Overseas Investment, Trade and the Environment, and Ms. Lin Ji, Executive Secretary of GEI for their guidance, support and participation throughout the research project. Finally, we would like to thank our interns who have contributed to the translation and editing of this report: Ms. Qiuyi Wang, Ms. Qian Zhu, Ms. Diana Gomez.

# Acronyms

ACFAP	Congolese Wildlife and Protected Areas Agency
ANAFOR	National Forest Development Support Agency
CAR	Central African Republic
CEMAC	Economic and Monetary Community of Central Africa
CITES	Convention on International Trade in Endangered Species of Wild Fauna and Flora
COMIFAC	Central African Forests Commission
DFAP	Fauna and Protected Areas Division
DGFE	Department of Forest Economy
DRC	Democratic Republic of the Congo
EAGLE	Eco Activists for Governance and Law Enforcement
ECCA	The Economic Community of Central African States
EFG	School of Fauna Garoua
EIA	Environmental Investigation Agency
FOCAC	Forum on China—Africa Cooperation
IUCN	International Union for Conservation of Nature
JPOGC	Judicial Police Officer with General Competence
JPOSC	Judicial Police Officer with Special Competence
LAB	Anti-poaching protocol agreement
LAGA	The Last Great Ape organization
MEFDD	Ministry of Forest Economy and Sustainable Development
MIKE	Monitoring the Illegal Killing of Elephants
MINEPIA	Ministry of Livestock, Fisheries and Animal Industries
MINFOF	Ministry of Forest and Wildlife
NCC	National Coordination Cell
NGO	Non-Governmental Organization
NIAP	National Ivory Action Plans
PALF	The Project for the Application of Law for Fauna in the Republic of Congo
PAPECALF	COMIFAC Space Area Subregional Action Plan for Strengthening the Application of National Legislation on Wildlife
PAULAB	Emergency Anti-Poaching Action Plan
PEXULAB	An extreme emergency anti-poaching plan
RoC	Republic of the Congo
SGTFAP	Sub Working Group on Wildlife and Protected Areas
TRIDOM	The Tri-national Dja-Odzala-Minkébé
UNODC	United Nations Office on Drugs and Crime

# Introduction

[1]

"Congo Basin Forests," Greenpeace USA, accessed August 09, 2019. <https://www.greenpeace.org/usa/forests/congo-basin/>.

Wildlife trafficking is increasingly considered a threat to global conservation efforts. With global momentum to combat international wildlife trafficking, countries along the supply chain should take collective action to ensure effective disruption of the trafficking chain.

For many years, Africa has served as a source of wildlife and wildlife products in the global chain of trafficking. The Congo Basin has received considerable attention because its rich and diverse rainforest ecosystem houses species that are not found elsewhere on Earth.<sup>[1]</sup> In the Congo Basin poaching and illegal wildlife trade are largely identified as among the main predictors of biodiversity decline. Uncontrolled trafficking of wildlife would not only significantly influence the ecosystem in the region but also have negative biodiversity consequences globally.

It is therefore important to understand key wildlife species involved in trade in the Congo Basin and examine their current status as well as the policy frameworks governing these resources in respective countries. More importantly, a question that needs to be asked is, along the wildlife trafficking route coming out from the Congo Basin, how can more stakeholders become involved and how can downstream countries work with these source countries to fight against poaching and trafficking while contributing to conservation efforts. Among other supply chain countries, China should be especially considered as a strategic partner as it already made a commitment to cooperate with African countries to combat wildlife trafficking via the Forum on China-Africa Cooperation.

This scoping research selects Cameroon and Republic of the Congo as two case countries (“Congo” is used throughout this report as a shortened version of Republic of the Congo, to be distinguished from Democratic Republic of the Congo or DRC). By understanding the status of key wildlife species in trade as well as local policies, line government authorities, and regional and international cooperation initiatives, it is hoped that the information could help develop a basic analysis of issues in these countries and shed light on the potential area for improvement and collaboration for these countries with other parts of the world, especially other countries along the global chain of wildlife trade.

This current scoping is mainly carried out through data collection and literature review. Based on best available data and relatively large volumes in trade, pangolins and elephants are the target species for data collection and analysis. We also carried out an extensive literature review including legal texts, academic peer reviewed literature, NGO and project reports, and websites, etc. which allowed us to study up-to-date management policies of wildlife conservation and trade in Cameroon and Congo, review current government authorities and structures promulgating and implementing wildlife trade issues, summarize relevant initiatives and stakeholders involved, analyse opportunities and challenges to effectively combat wildlife trafficking in the two countries and finally, put forward suggestions for cooperation with China. Relevant organizations and experts in Cameroon, Congo and China were consulted for insights on the legitimacy of information as well as their recommendations for further actions.

Our research is limited by a lack of complete trafficking data as well as information about the most up-to-date policies and legislation in Cameroon and Congo that are publicly available. Nevertheless, this scoping is meant to serve as a tool to promote further research, facilitate exchanges between the concerned countries and China as well as other parties at both government and non-government levels, and incentivize awareness and improved capacities for collaboration amongst key stakeholders, thus promoting joint efforts to fight against international wildlife trafficking and share the experiences throughout the supply chain.

1

# Wildlife Status and Trafficking Issues in Cameroon and Congo

1.1 Pangolins in Cameroon and Congo / 05-07

1.2 Elephants and Ivory in Cameroon and Congo / 08-12

Table 1-1: News Reports on Wildlife being Traded from Cameroon and Congo

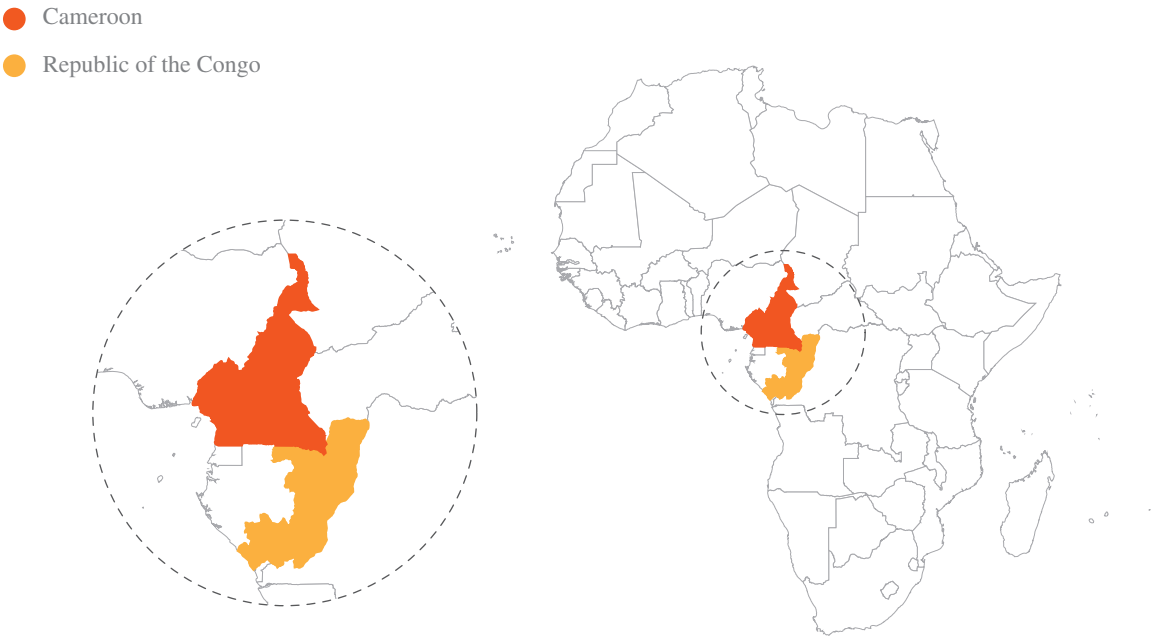
Data source: Collected and sorted by GEL.

Reported Date	Species	Specimens	Quantity	Source	Destination	Incident	Information Venue
8/18/2011	Elephant	Ivory	5 tusks, 80 pieces ivory chopsticks, several seals, 3 pieces ivory carvings and other small ivory products.	Republic of the Congo	Beijing, China	Chinese citizens were sentenced to 4 years imprisonment in Congo for smuggling ivory	Tencent
5/9/2014	Pangolin	Scales	30kg	Cameroon	Shanghai, China	30kg pangolin scales were found in inbound mail	Sina
6/16/2014	Pangolin	Scales	2340kg	Cameroon	Hong Kong SAR, China	Hong Kong Customs cracked the largest smuggling pangolin scales in the past five years	Hong Kong China News Agency
9/2/2014	Elephant	Ivory	200 pcs	Cameroon, Gabon	Asia	Cameroon seized 200 pieces of ivory bound for Asia	VOA
6/28/2016	Pangolin	Scales	4t	Cameroon	Hong Kong SAR, China	Hong Kong police seized 4 tons of pangolin scales	Netease
12/21/2016	Pangolin	Scales	670kg	Central African Countries	Malaysia	Cameroon seized 670 kg of pangolin bound for Malaysia	VOA
8/21/2018	Elephant &Pangolin	Ivory, Scales	N/A	Republic of the Congo	Asia	New technology led to the arrest of eight suspects for trafficking wildlife organs	MONGABAY
8/22/2018	Pangolin	Live body/ Scales	700kg	Central African Republic	Vietnam	Cameroon busted pangolin trafficking to Vietnam	VOA
12/6/2018	Pangolin	Scales	2.8t	Ghana, Cameroon	Malaysia	Malaysia destroyed 2.8 tons of African pangolin scales	Radio Taiwan International
3/29/2019	Elephant	Ivory	9t	Republic of the Congo	Vietnam	Vietnam seized 9 tons of ivory from Congo	South China Morning Post
4/4/2019	Elephant &Pangolin	Ivory, Scales	300kg Ivory, 2500kg Pangolin scales	Cameroon	Nigeria	Cameroon arrested four wildlife smugglers and seized 2.5 tons of pangolin scales	Business in Cameroon



Africa, together with Central and South America and Southeast Asia, is a biological hotspot that plays both important sourcing and exporting roles along the international wildlife trafficking route. International trafficking of wildlife and its products from Africa was speculated to be due to 1) increasing demand from other countries, and 2) improved economic and political bonds between African countries and other regions.

Figure 1-1: Map of Africa with Cameroon and Congo Highlighted



### 1.1 Pangolins in Cameroon and Congo

#### Pangolin Status

There are four species of pangolins in Africa (See Table 1-2). All African pangolins but *S. temminckii* inhabit areas of West and Central Africa, which is a region reported as the source for large numbers of pangolins taken for international trade and trafficking to Asia. Both Cameroon and Congo are found to be inhabited by *phataginus tetradactyla*, *p. tricuspis*, and *smutsia gigantea*.

All pangolin species enjoy full protection in Cameroon, which means that hunting, capture, killing and trade of pangolins are prohibited in Cameroon. Meanwhile, in Congo not all species of pangolins are considered under total protection.

Table 1-2: Four Species of African Pangolins

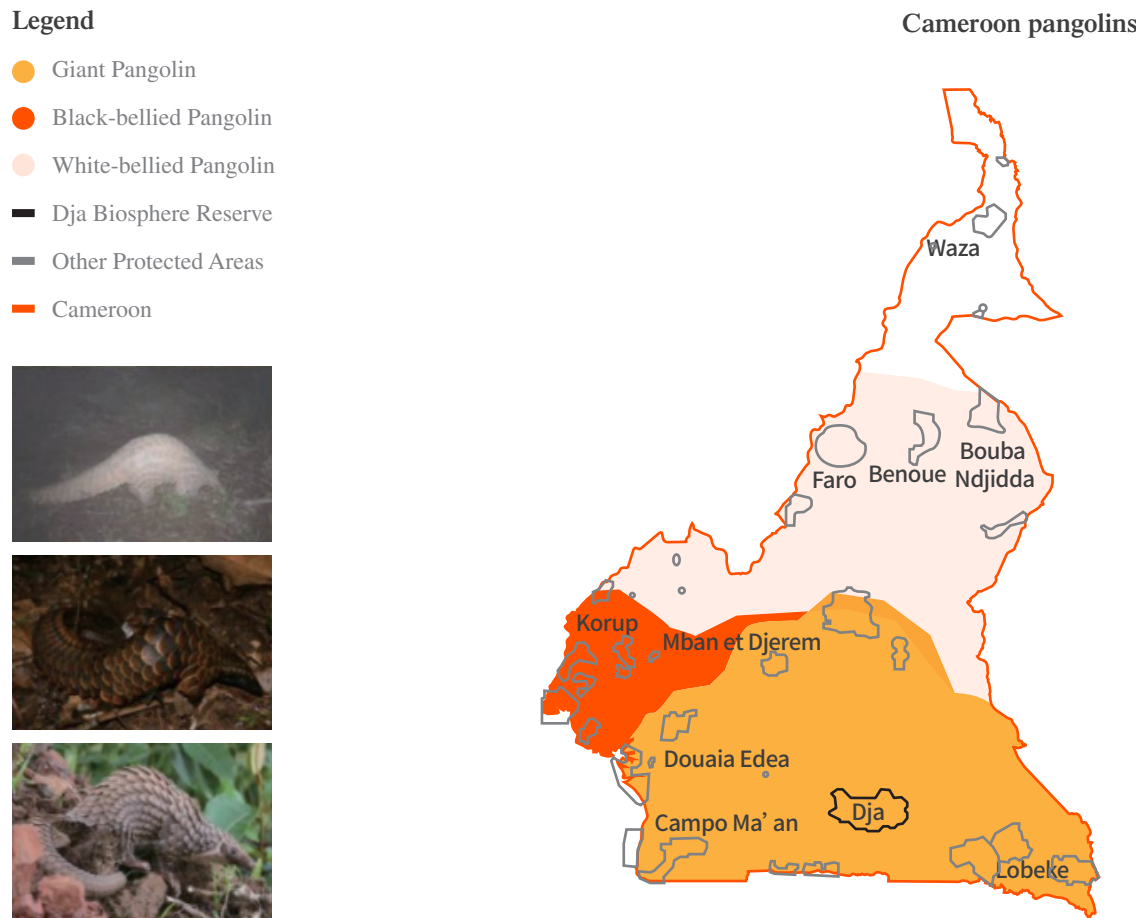
Common Name	Scientific Name	Main Area in Africa
black-bellied pangolin	<i>Phataginus tetradactyla</i>	<b>Central and western Africa:</b> Cameroon; Central African Republic; Congo; DRC; Côte d'Ivoire; Equatorial Guinea (Equatorial Guinea (mainland)); Gabon; Ghana; Liberia; Nigeria; Sierra Leone.
white-bellied pangolin	<i>P. tricuspis</i>	<b>Central and some Western Africa:</b> Angola; Benin; Cameroon; Central African Republic; Congo; DRC; Côte d'Ivoire; Equatorial Guinea (Bioko, Equatorial Guinea (mainland)); Gabon; Ghana; Guinea; Guinea-Bissau; Kenya; Liberia; Nigeria; Rwanda; Sierra Leone; South Sudan; Tanzania, United Republic of; Togo; Uganda; Zambia.
giant pangolin	<i>Smutsia gigantea</i>	<b>Central and some Western Africa:</b> Cameroon; Central African Republic; Congo; Congo, The Democratic Republic of the; Côte d'Ivoire; Equatorial Guinea (Bioko, Equatorial Guinea (mainland)); Gabon; Ghana; Guinea; Guinea-Bissau; Liberia; Senegal; Sierra Leone; Tanzania, United Republic of; Uganda.
Temminck's ground pangolin	<i>S. temminckii</i>	<b>East Africa:</b> Botswana; Central African Republic; Chad; Kenya; Malawi; Mozambique; Namibia; Rwanda; South Africa; South Sudan; Tanzania, United Republic of; Uganda; Zambia; Zimbabwe

Table 1-3: Seizures of Pangolins and Their Parts in Cameroon and Congo from January 2006 - June 2018

Data source: Collated from Characterising trafficking and trade of pangolins in the Gulf of Guinea.

Country	Year	Location	Genus	Item Seized	Quantity	Additional items seized	Source
Cameroon	2007	Mezam	Smutsia	meat	-	Meat from chimpanzee and other protected species	LAGA
	2008	Haut-Nyong	Smutsia	meat	-	2 tusks and meat of elephant and gorilla	LAGA
	2009	Mfoundi	Smutsia	meat	-	Meat from dwarf crocodile, potto, monkey and gorilla	LAGA
	2010	Dja-et-Lobo	Smutsia	meat	-	Chimpanzee, duiker and water chevrotain meat	LAGA
	2012	Haut-Nyong	Smutsia	Whole animal	1	Other meat	LAGA
	2013	Fako	Smutsia	Scales	7 sacs	-	LAGA
	2013	Limbe, Fako	-	Scales	80 kg	-	EIA
	2013	Mfoundi	-	Scales	7 sacs	Live forest tortoise	LAGA
	2013	Mfoundi	Smutsia	Scales	44 kg	4 elephant tusks and 25 pieces of worked ivory	LAGA
	2014	Mfoundi	Smutsia	Scales	4 bags	-	LAGA
	2014	Yaounde, Mfoundi	-	Scales	120 kg	-	EIA
	2014	-	-	Scales	150 kg	5 gorilla skulls, 7 chimpanzee skulls, elephant jawbone	EIA
	2014	Kadey	Smutsia	Scales	>100 kg	Elephant, gorilla and chimpanzee bones	LAGA
	2014	Noun	Smutsia	Scales	4 kg	Chimpanzee: 1 Live, 7 skulls and 30 hands	LAGA
	2015	Yaounde, Mfoundi	Smutsia	Scales	100 kg	-	EIA
	2015	Near Deng Deng National Park	Smutsia	Scales	14 kg	-	EIA
	2015	Bertoua, Lom-et-Djerem	-	Scales	200 kg	-	EIA
	2015	Bafoussam, Mifi	-	Whole	1	Olive baboon, porcupine, civet and duiker meat	EIA
	2015	-	-	-	-	-	EIA
	2015	Mbam-et-Kim	Smutsia	Scales and legs	4 legs	1 baby colobus monkey	LAGA
	2015	Mfoundi	Smutsia	Scales	114 kg	-	LAGA
	2015	Kadey	Both	Scales	2.5 kg	2 Chimpanzee skulls	LAGA
	2015	Mfoundi	Smutsia	Scales	114 kg	-	LAGA
	2015	Mefou-et-Afamba	Smutsia	Scales	100 kg	-	LAGA
	2015	Lom-et-Djerem	Smutsia	Scales	15 kg	-	LAGA
	2016	Bertoua, Lom-et-Djerem	Smutsia	Scales	200 kg	12 ivory tusks	LAGA
	2016	Nyong-et-Kell e	-	Scales	-	Sea turtle shells and chimpanzee skulls	LAGA
	2016	-	Smutsia	Scales	-	-	LAGA
	2016	-	-	Scales	128 kg	-	LAGA
	2016	Yaounde airport, Mfoundi	-	Scales	670 kg	-	EIA
	2016	Ngauondal, Region of Adamaoua	-	Scales	128 kg	-	EIA
	2017	Douala, Wouri	Smutsia	Scales	5 tonnes	-	EIA
	2017	Messamena	-	Scales	94 kg	-	LAGA
	2017	Yaounde, Mfoundi	-	Scales	45 kg	Leopard skin	LAGA
	2017	Ebolowa, Mvila	-	Scales	35 kg	Baby chimpanzee	LAGA
	2017	Yaounde, Mfoundi	-	Scales	41 kg	Baby mandrill	LAGA
	2017	Ebolowa	-	Scales	50 kg	-	LAGA
	2017	Bangangte, Nd	e	Scales	-	2 leopard skins	LAGA
	2017	Sangmelima, Dja-et-Lobo	Smutsia	Scales	10.5 kg	4 ivory tusks	LAGA
	2017	Douala, Wouri	-	Scales	128 kg	-	LAGA
	2018	Ambam, Vallee-du-Niem	-	Scales	80 kg	Baby chimpanzee	LAGA
	2018	Betare Oya, Lom-et-Djerem	-	Scales	36.5 kg	6 hippopotamus teeth, 2 boa skins	LAGA
	2018	Santhou, Menoua	-	Scales	-	Elephant bones, ivory	LAGA
	2018	Doume, Haut-Nyong	-	Scales	35 kg	-	LAGA
	2018	Douala airport	-	Scales	100 kg	Ivory	Author search
Congo	2015	Yengo, Sangha Department	-	Scales	3 bags	-	EIA
	2015	Point Noire	Phataginus	Whole	7	Chimpanzee skulls	PALF
	2015	-	Smutsia	Whole	1	-	PALF
	2018	Sibiti, Lekoumou Department	Smutsia	Scales	1 bag	3 ivory tips	Robin Des Bois

Figure 1-2: Distribution of Pangolins in Cameroon



Data source: ZSL, Securing Pangolin Strongholds: A Cameroon Case Study.<sup>[4]</sup>

Pangolin Trafficking

Coastal countries near the Gulf of Guinea, including Cameroon and Congo, are especially considered hotspots for pangolin exploitation and international trafficking.<sup>[5]</sup> More seizure data exist for Cameroon than for Congo, which could possibly be due to different law enforcement efforts (Table 1-3).

Cameroon, along with Togo and South Africa, was the largest exporter of pangolins from Africa for the intercontinental trade before the CITES ban on commercial international trade of pangolin took effect in 2017.<sup>[6]</sup> Analyses of seizure data in Cameroon shows a steady increase of seizure occasions from 2012 to 2015, when there was a peak total of 11 seizures. The number of seizures started to fluctuate in the following years. Data also suggest that illegal trade in pangolins may have shifted from meat to scales from approximately 2013 onwards. About half of the recorded seizures (24 out of 45) included trafficking of pangolins together with illicit trade of other protected species, including elephants, gorillas and chimpanzees, suggesting that pangolin traffickers are part of organized criminal groups.<sup>[7]</sup> 24 out of 45 seizure cases confirmed the pangolin species as Smutsia, and the rest of the cases did not record the species in detail. Most seizures occurred in Mfoundi (11), Yaounde (5) and Douala (3).

[4]

Paul De Ornellas, *Securing Pangolin Strongholds: A Cameroon Case Study*, PPT, ZSL.

[5]

Daniel J. Ingram et al., "Characterising Trafficking and Trade of Pangolins in the Gulf of Guinea," *Global Ecology and Conservation* 17 (2019): 1, doi: 10.1016/j. gecco. 2019. e00576.

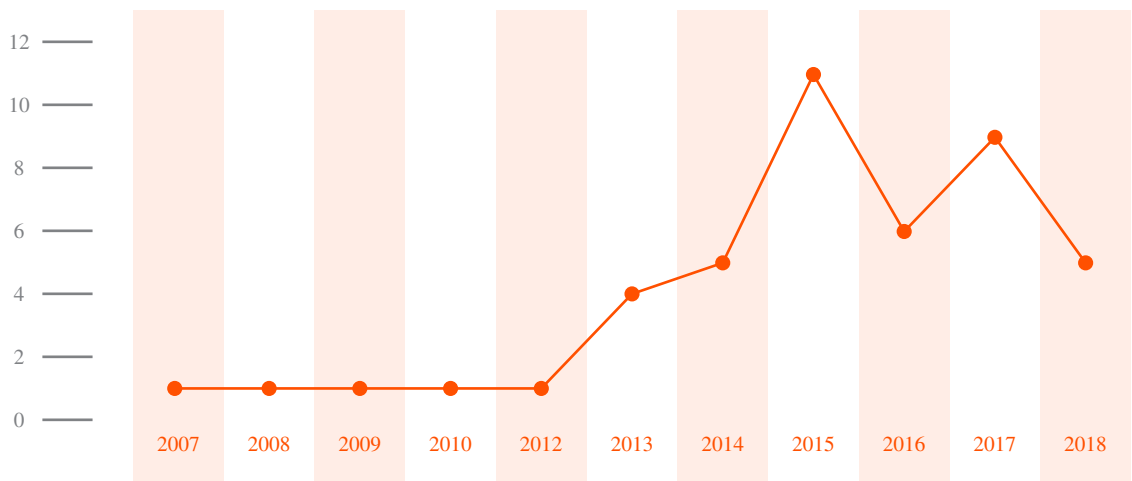
[6]

Ibid.

[7]

Ibid.

Table 1-4: Count of Pangolin Seizures in Cameroon from 2007-2018



[8]

20 seizures took place in China, of which 9 were in Hong Kong SAR, totaling 42543 kg of African pangolin scales.

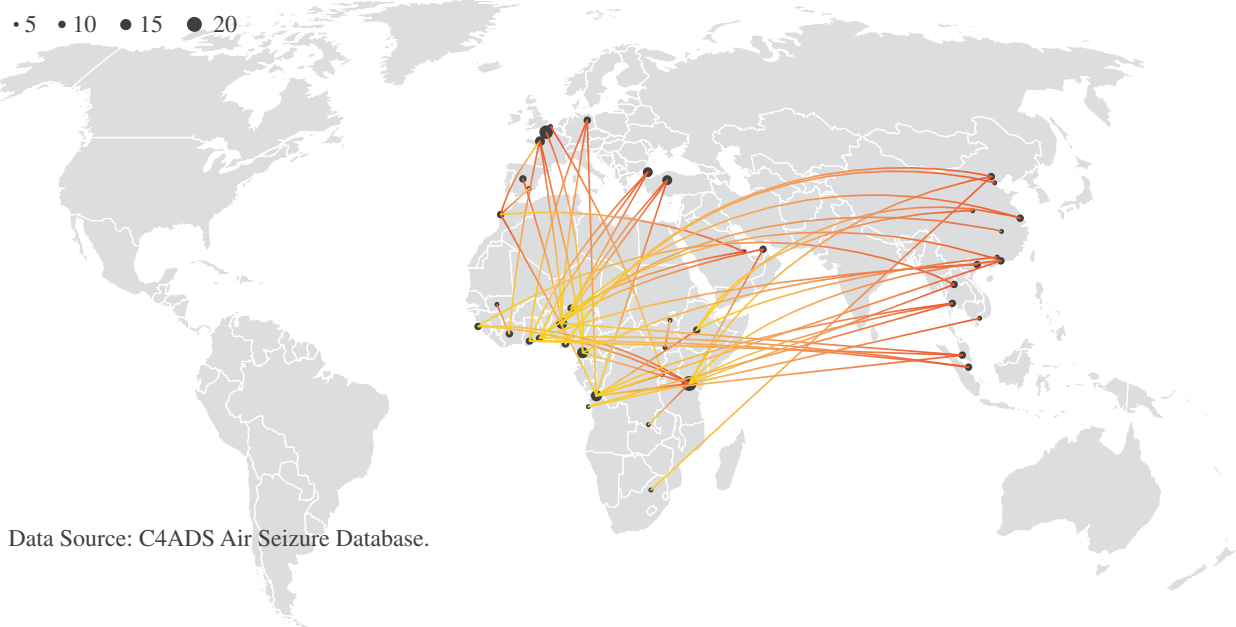
[9]

Ibid.

Based on an analysis of 33 seizures involving 55,893kg of pangolin scales being sold to Asia between 2012 and 2018, Cameroon and Congo, along with Nigeria and Ghana, are identified as major pangolin trafficking source countries, among other coastal countries near the Gulf of Guinea. These pangolins were reported to be destined for China (incl. Hong Kong SAR), Lao PDR, Malaysia, and Vietnam. A majority of seizures that could be directly linked to Asia were consignments of pangolin scales that were either exported from or originated in Nigeria and Cameroon.<sup>[8]</sup>

The main method of transportation of pangolin scales was air, followed by sea. Shipments of pangolin scales were frequently disguised as fish scales, cashew nuts or oyster shells, or labelled as logs or metal/plastic scraps.<sup>[9]</sup>

Figure 1-3: World Pangolin Trade Air Trafficking Routes



1.2 Elephants and Ivory in Cameroon and Congo

[10]

Rachael Bale, "Experts Explain How the Slaughter Could Have Happened in a Place like Botswana.," *National Geographic*, September 04, 2018, accessed August 09, 2019. <https://www.nationalgeographic.com/animals/2018/09/willife-watch-news-botswana-elephants-poaching/>.

Elephant Status

There are two species of African elephants: African savanna elephants and African forest elephants. Both are found in the Central Africa sub-region. African forest elephants are native to the Congo Basin.

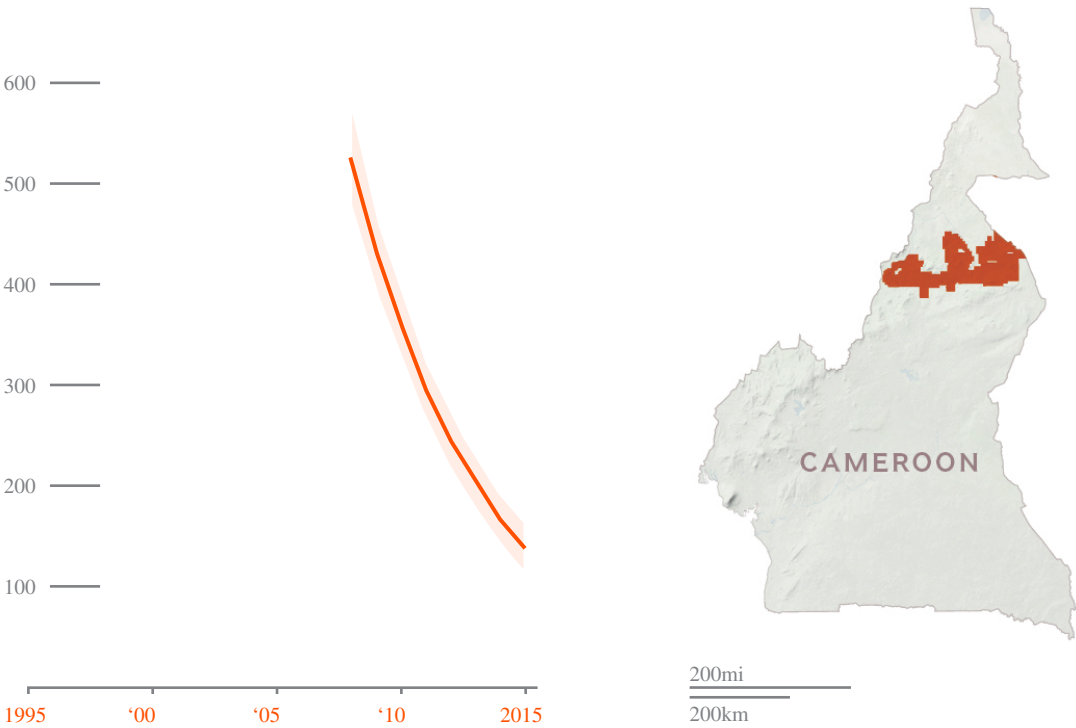
In Cameroon, savanna elephants are found in the northern Sahelian and Sudanian regions, while forest elephants can be found in the southern forested area (Roca et al., 2015; Tchamba et al., 1997). Heavy poaching in the northern region has caused significant losses to savanna elephant populations in northern Cameroon. A site survey of African savanna elephants by the Great Elephant Census in 2014 and 2015 indicates that Cameroon had the second steepest decline in savanna elephants, just after Chad. It was estimated that only 148 savanna elephants remain in the northern Cameroon study site, therefore placing them at risk of extinction.<sup>[10]</sup>

Figure 1-4: African Savanna Elephant Population in Northern Cameroon Site

Annual Elephant Population

Data Source: Great Elephant Census, 2014 and 2015.

- Estimated population
- Margin of error

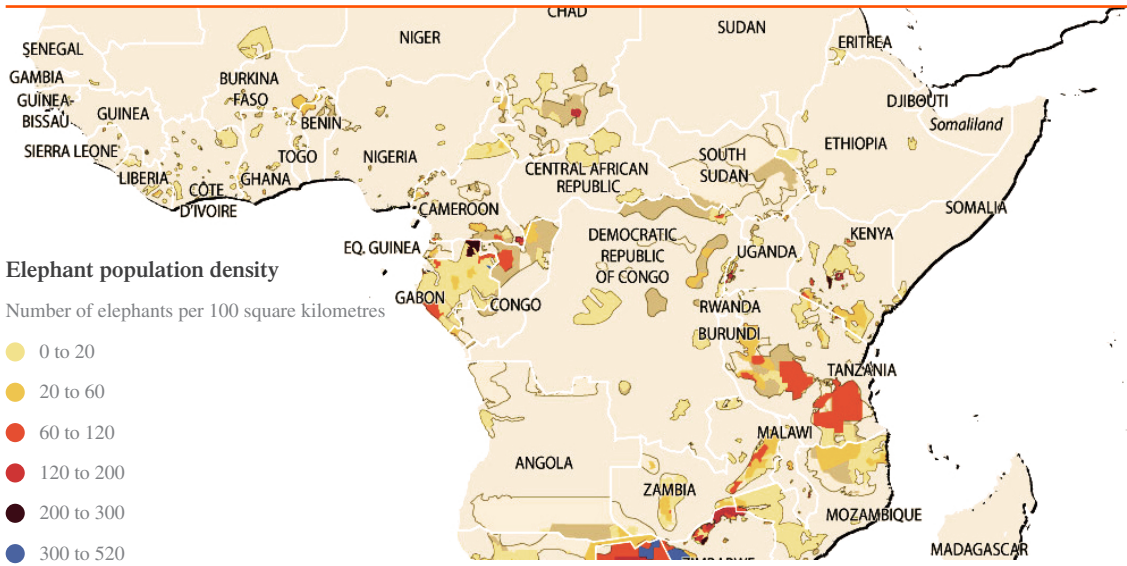




Congo probably still holds Central Africa’s second largest number of forest elephants. Most of the elephants occur in forest areas in the north, while only smaller numbers are found in the west along the Atlantic coast and the border with Gabon. For the rest of the country, covered by sporadic patches of savanna and forest, elephants have almost entirely vanished.

Elephant density does not seem to be very high in known and potential ranges in Cameroon and Congo, compared to other countries in Africa. Elephant ranges in Congo are more connected and larger in the percentage of total country land area.

Figure 1-1: Map of Africa with Cameroon and Congo Highlighted



Data Source: Great Elephant Census, 2014 and 2015.

Table 1-5: Elephant Population and Ranges in Cameroon and Congo (2016)

Country	2016 elephant estimate	2016 Guesses	Range number	Range area	% of country area
Cameroon	6,830 ± 943	1,985- 2,134	25	89,718 km²	19%
Congo	6,057 ± 1,222	20,924 - 26,942	17	89,718 km²	44%

[11]  
"Central Africa 2016 African Elephant Status Report".  
[http://africanelephantdatabase.org/report/2016/Africa/Central\\_Africa](http://africanelephantdatabase.org/report/2016/Africa/Central_Africa).

Data Source: African Elephant Database, IUCN. [11]

[12]  
C. R. Thouless et al., "African Elephant Status Report 2016: An Update from the African Elephant Database," 2016.  
<https://www.iucn.org/content/african-elephant-status-report-2016-update-african-elephant-database>.

According to IUCN’s African elephant status report in 2016, there were dramatic losses in some elephant populations from 2006-2016 in Central African countries, including the “the loss of approximately 3,000 elephants, representing 50% of the population, in the Ndoki landscape in Congo (Maisels et al., 2012), the loss of several thousand elephants in the Cameroon section of the TRIDOM and the loss of more than 50% of elephants from a number of smaller populations in Cameroon and the DRC.” [12]

In Congo, it is generally illegal to hunt and trade elephants. However not all elephants enjoy the same level of protection in Cameroon. Elephants with tusks of less than 5 kilograms are fully protected, while those with tusks weighing more than 5 kg could potentially be hunted, captured or killed, subject to the approval of a hunting permit.

Illegal killing of elephants in the Central African region has remained at a higher rate than other parts of Africa, with significant rates found in MIKE sites of both Cameroon and Congo. In 2011, almost all of the elephants found dead in Waza National Park in Cameroon and Odzala-Koukoua Nantional Park in Congo were being killed illegally.

Table 1-6: Illegally Killed Elephants in MIKE Sites in Cameroon and Republic of the Congo (2011)

Country	MIKE Site Name	Estimated Illegally killed/all died
Cameroon	Waza National Park	100%
Cameroon	Boumba-Bek National Park	80%
RoC	Dzanga-Sangha National Park	40%
RoC	Nouabale-Ndoki National Park	40%
RoC	Odzala-Koukoua National Park	95%

Data source: Collected from GRID-Arendal.

[13]  
**Elephant Ivory Trafficking**

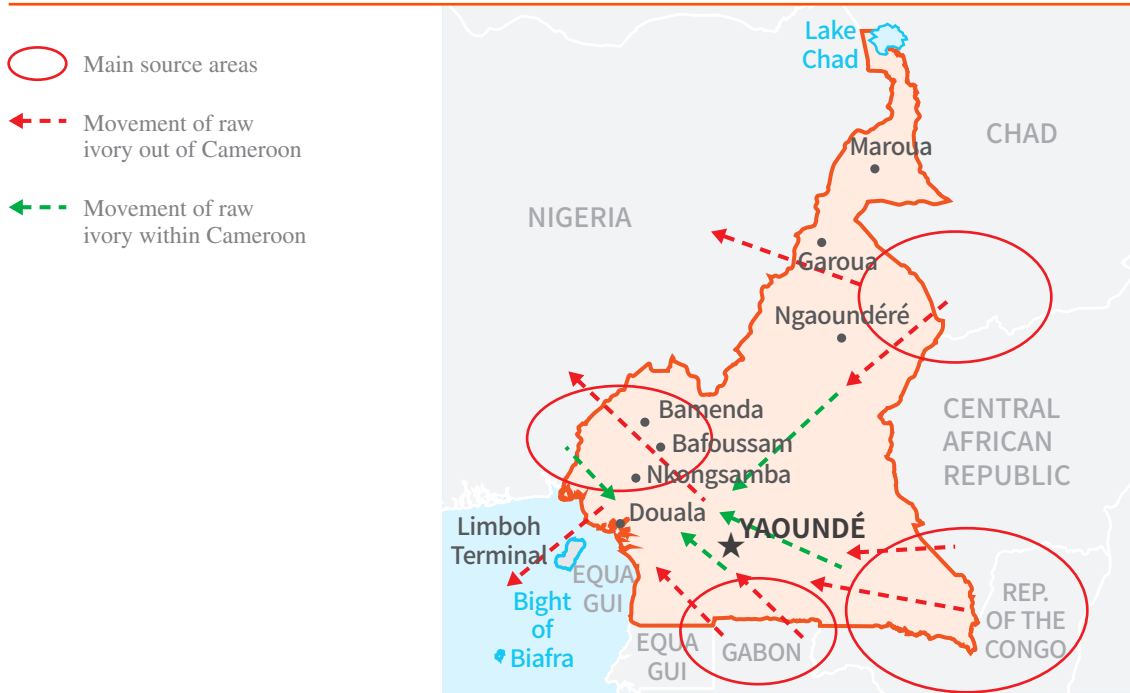
"NIAP – Country – Cameroon," EIA Reports, accessed August 09, 2019.  
<https://reports.eia-international.org/niap/niap-country-cameroon/>.

[14]  
Sone NKOKE Christopher et al., *IVORY MARKETS IN CENTRAL AFRICA Market Surveys in Cameroon, Central African Republic, Congo, Democratic Republic of the Congo and Gabon: 2007, 2009, 2014/2015*, PDF, TRAFFIC, September 2017, 53.

Discussions around exploitation and poaching of African elephants is mainly related to ivory trafficking. Both Cameroon and Congo are categorized by CITES as Category B Parties, meaning they are markedly affected by the illegal trade in ivory.

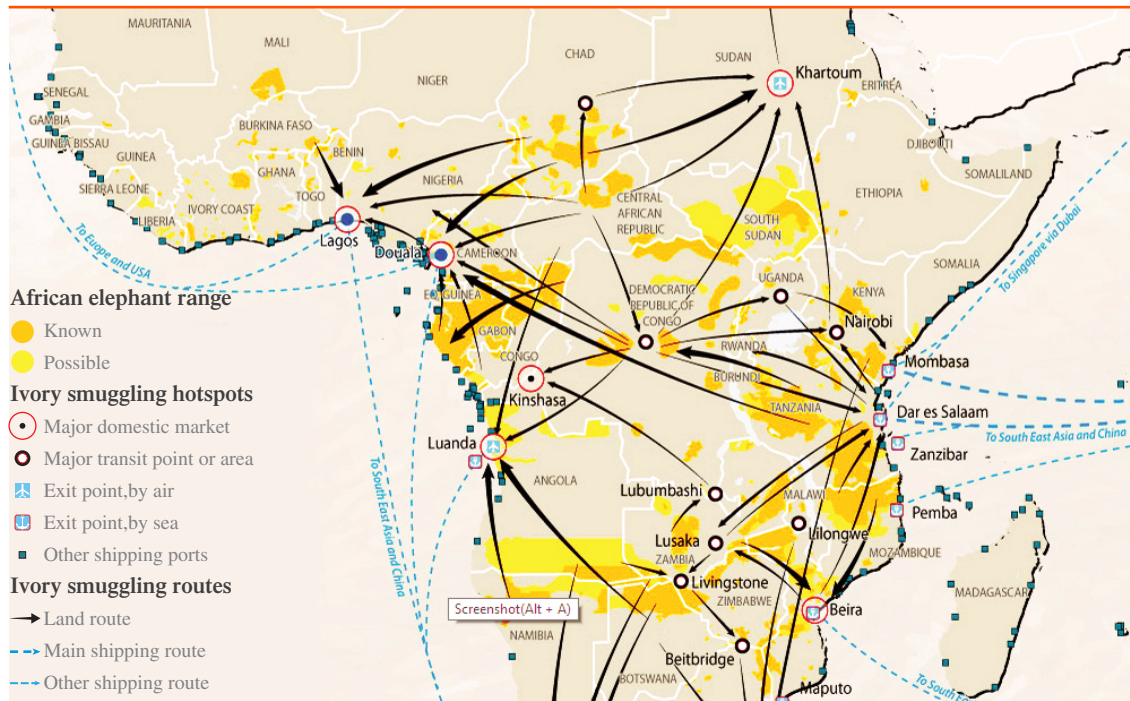
Studies have found poaching sources and transportation routes of raw ivory in both Cameroon and Congo. In Cameroon, in addition to domestic sources from the eastern, southern and southwestern regions, there were also reports of raw ivory from Gabon, Congo and Central Africa Republic being sold in Yaounde and Douala. Djoum in southern Cameroon serves as a transit hub for ivory coming from Gabon in the south and from other areas to the east. [13] Some of the ivory is then transited to Nigeria, Togo and Senegal. (See Figure 1-6) [14]

Figure 1-6: Major Sources and Movement of Raw Ivory in and out of Cameroon



Source: Sone NKOKE Christopher et al.

Figure 1-7: Ivory Smuggling Hotspots and Routes (2012)



Source: GRID-Arendal

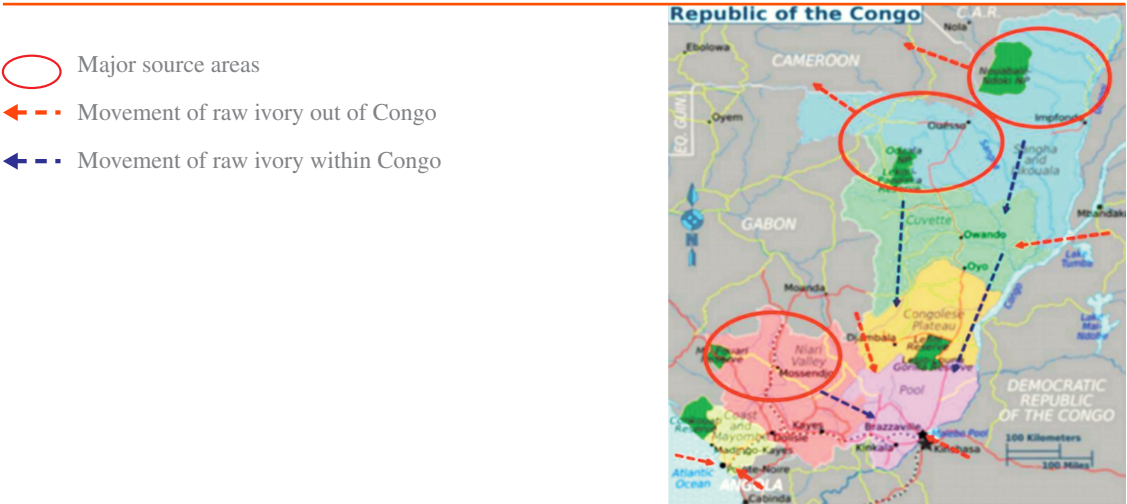
[15]

Ibid., 23

Douala in Cameroon is also an important hub for ivory smuggling from other parts of Africa for transit to Asia. Once ivory is received there, it is transported via land routes to Tanzania, Democratic Republic of Congo (DRC), Central African Republic, Chad, Gabon and Republic of the Congo (RoC). From these points, the ivory is exported to Asia.

In Congo, Pointe Noire and Brazzaville are major markets where raw ivory is sourced from the northern part of Congo, DRC, Angola, and even from Benin by sea. The northern part of the country also serves as an export site for products sent to Cameroon.<sup>[15]</sup>

Figure 1-8: Major Sources and Movement of Raw Ivory in the Republic of the Congo



Source: Sone NKOKE Christopher et al.

Large scale ivory seizures mainly occur in Cameroon (Table 1-7). However, trafficking route and poaching source information indicate that Congo may still exist as part of the supply chain.

Table 1-7: Large Scale Ivory Seizures in Cameroon and Republic of the Congo

Year	Country	Location of seizure	Quantity of ivory seized (kg)	Number of elephants represented by seizure
2004	Congo	Pointe-Noire	525	78
2009	Cameroon	Douala	1000	149
2014	Cameroon	Yaounde area	659.95	99
2017	Cameroon	Douala	529.3	79
2017	Cameroon	Djoum	723.6	108

Data Source: Environmental Investigation Agency

# Wildlife-related Legislation and Government Authorities in Cameroon and Congo

## 2.1 Cameroon

## 2.2 Congo

## 2.3 Summary

[16]

S. Nguiffo and M. Talla, *Cameroon's Wildlife Legislation: Local Custom Versus Legal Conception*, PDF, Italy: FAO, 2010.

[17]

Full text of this decree is not available online, but summary of which was found at Christopher, *IVORY MARKETS IN CENTRAL AFRICA Market Surveys*, 53.

[18]

Pangolin Poaching in Africa and Trafficking to Asia, accessed August 09,2019.  
<https://www.ippmedia.com/en/features/pangolin-poaching-africa-and-trafficking-asia>.

Congo Basin countries inherited their legal frameworks for wildlife regulation from France during the colonial era, the main legislation being the 18 November 1947 decree regulating hunting in the African territories released by the French Ministry of Overseas Territories. Other pieces of influential legislature include the 1900 London Convention on the protection of animals in Africa and the 1933 Convention Relative to the Preservation of Fauna and Flora in Their Natural State. These documents ensured recognition of then-newly introduced uses of wildlife (especially scientific, touristic and decorative uses) in the region and was intended to reconcile the new uses of wildlife resources with traditional hunting.<sup>[16]</sup>

Both Cameroon and Congo continued along the same lines of legislation in managing wildlife resources after their independence in 1960. In their French-style legal framework regarding wildlife management, there are “laws” which are passed and approved through parliament. There are also “orders” which are approved and signed by ministers. The “decrees” are decided by the executive power and directly signed by the president and can be active immediately. Finally, a “circular” function, which is more like a policy that delegate public officials’ power to exercise certain principles or practices.

This section examines the main content of various legislation in both countries, as well as relevant government authorities in managing wildlife conservation and trafficking issues.

## 2.1 Cameroon

Cameroon joined CITES on June 5, 1981, an agreement that legally entered into force on September 3, 1981. Current legal instruments on wildlife protection in Cameroon include:

Table 2-1: Wildlife Legislation in Cameroon

Legislation	Main Content
Law No. 94-01 of 20 January 1994	Foundational text in Cameroon that establishes forestry, wildlife and fisheries regulations on protection and management.
Decree No. 95-466-PM of 20 July 1995	Specifies conditions for the implementation of the wildlife regulations, especially actions with regard to wildlife.
Order No. 0565-ADFAP-SDF-SRC of 14 August 1998 & Order NO. 0648 MINFOF OF 18 DECEMBER 2006	Establishes and updates the list of animals classified into A, B and C.
Decree No. 0050 of 22 September, 2004	Conditions under which one can obtain a permit to work ivory and/or trade in ivory and its products. <sup>[17]</sup>
Decree No 2005/2869/PM of July 29, 2005	Application of a number of CITES provisions regarding detention, transport, international and domestic trade in all species of fauna, flora and fishery resources listed in Appendix I, II and III
Order No 067/PM of June 27, 2006	Provides the organizational set-up and operational procedure of the Inter-ministerial Coordination and Monitoring Committee for the implementation of the CITES.
Decision No 104/D/MINFOF/SG/DF/SDAFF/SN of March 02, 2006	Provides the designation and definition of the role of the CITES Scientific Authority in Cameroon.
Order N°055/CAB/PM of 6th July 2015	Creates National Ivory Action Plans (NIAP) Committee to include members from relevant ministerial departments.
Ministerial circular No 0007/LC/MINFOF/DFAF/SVEF of 11 January 2017	Restricts poaching, commercialization and exportation of pangolins. <sup>[18]</sup>



Law No. 94-01 of 20 January 1994 is considered the “wildlife code” in Cameroon, giving the State the responsibility to protect the forest, wildlife and fisheries resources. Under this law, the Ministry of Forest and Wildlife (Ministère des Forêts et de la Faune, MINFOF) was given the full authority carry out biodiversity conservation and implement regulatory mechanisms for the protection of these natural resources.

The protection level of wildlife was defined by Law No. 94-01 of 20 January 1994, Order No. 0565-ADFAP-SDF-SRC of 14 August 1998, and its update in Order NO. 0648 MINFOF OF 18 DECEMBER 2006. Classes A, B, C are used in which class A species should be totally protected and their capture shall be subject to the granting of an authorization by the service in charge of wildlife; class B species are partially protected and may be hunted, captured or killed subject to the granting of a hunting permit; and class C species are partially protected and their capture or killing shall be regulated by conditions laid down by the order of the minister in charge of wildlife. According to Order NO. 0648 MINFOF OF 18 DECEMBER 2006, all CITES Appendix I species are automatically considered in Class A, enjoying complete protection.

Table 2-2: Protection levels of key species in concern in Cameroon

Category	Common Name French	Common Name English	Scientific Name
Class A	Pangolin	Pangolin	phataginus tetradactyla, p. tricuspis, smutsia gigantean, etc.
	Elephant (pointe de moins de 5kg)	African Elephant, African Savanna Elephant (with tusk of less than 5 kilograms)	Loxodonta spp.
	Rhinocéros noir	Black Rhinoceros, Browse Rhinoceros, Hook-lipped Rhinoceros	Diceros bicornis
Class B	Elephant (pointe de plus de 5kg)	Elephant (with tusk of more than 5 kilograms)	Loxodonta spp.

All pangolin species are provided full protection, thanks to the 2006 order as well as the Ministerial circular No 0007/LC/MINFOF/DFAF/SVEF of 11 January 2017, which prohibits the hunting, capture, killing and trade of pangolins in Cameroon. However, not all elephants enjoy the same level of protection, as only those with tusks of less than 5 kilograms are allocated to class A while those with tusks weighing more than 5 kg could potentially be hunted, captured or killed, subject to the approval of a hunting permit.

[19]

Full text of this decree is not available online, but summary of which was found at Christopher, *IVORY MARKETS IN CENTRAL AFRICA Market Surveys*, 53.

[20]

STRATEGIE ET PROGRAMME DE GESTION DURABLE DES ELEPHANTS AU CAMEROUN 2011 - 2020, PDF, Bamenda: Cameroon Ministry of Forestry and Wildlife, January 2011, 32.

Hunting, in various forms, is permitted in Cameroon subject to MINFOF authorization permits and licenses. Law No. 94-01 of 20 January 1994 and Decree No. 95-466-PM of 20 July 1995 articulate requirements and procedures to carry out legal hunting, the disposal of hunted animals, and the processing, circulation marketing and exportation of wildlife and related products. Legally hunted animals may have their meat and trophies freely disposed of, which thereby allow for the disposal of more or less any part of the animal, including tusks, teeth, skulls, skins, paws, horns, feathers, tails, etc. The law also allows for individuals to keep, domestically transport or breed live protected animals and their body parts, as well as for exportation or transformation into crafts for commercial purposes, as long as licenses or permits are attained from MINFOF and subject to fee payments.

Additionally, processing and trade of ivory is also allowed, as long as individuals obtain the proper permit, as stipulated by Decree No. 0050 of 22 September 2004. [19]

Fees collected by the State through hunting and commercialization permitting and licensing go into the public treasury and a special fund for wildlife conservation development, according to Law No. 94-01 of 20 January 1994. Through this activity, Cameroon aims to realize reduction of human-elephant conflicts and to generate income for the State, municipalities and local people in areas with large populations. [20]

In summary, in Cameroon it is legal to hunt and trade parts of elephants with tusks larger than 5 kg, as well as to process elephant ivory, as long as the proper procedures of permitting and licensing are followed. These fees are taken as a source of income tied to development in the country. Illegal activities such as poaching or illegal trade, by definition, then include: “1) Falsification or forgery of any document (be it for hunting and trade of elephants with tusks larger than 5 kg and other class B and C species or ivory processing and trade) issued by the services in charge, and 2) Killing or capture of pangolins, elephants with tusks less than 5 kg, and other class A species, or killing or capture of Class B and C species either during periods when hunting is closed or in areas where hunting is forbidden or closed, or of Class A species.”

In terms of illegal activities, Decree No. 95-466-PM of 20 July 1995 indicates the power of judicial police officers of having special jurisdiction over wildlife-related offences, the content of wildlife related offence reports, and the penalties imposed on wildlife related offences. Meanwhile, Law No. 94-01 of 20 January 1994 defines the penalty, which is to impose a fine ranging from 3,000,000 to 10,000,000 CFA francs (~5,069-16,895 USD as of December 2019) or imprisonment for one to three years, or both such fine and imprisonment.

Several other policies were released to address CITES-related issues, including the requirement for Cameroon, as a Category B country that is markedly affected by the illegal trade in ivory, to join NIAPs. These policies included the following:

01

Decree No 2005/2869/PM of July 29, 2005 sets forth the application of a number of CITES provisions, “in particular regarding detention, transport, international and domestic trade in all species of fauna, flora and fishery resources listed in Appendix I, II and II to the Convention”.

The decree designates the responsibilities and roles for various agencies in managing CITES-related issues and calls for inter-ministerial collaboration to enforce it. In addition to the MINFOF acting as the managing authority, the customs and law enforcement officials are also mentioned in the policy text to administer and control the trade of endangered species. Further, the decree requires the establishment of an inter-ministerial committee for coordinating and monitoring the CITES.

Interestingly, special provisions are given to several instances in which the presentation of export or re-export permits/certificates may not be required for the transit or transshipment of CITES listed species. These special cases include elements such as:



01continued

- The specimens, part or product, remain under the control of the customs;
- The management body has proof that the specimen was acquired before September 3, 1981, and issues a certificate for this purpose;
- The specimens are personal or household objects. This derogation shall not apply in the case of specimens of species listed in Annexes I and II acquired outside the State of residence of the owner or where the regulations of the country of origin of the specimens require an export permit for the specimens concerned;
- Specimens of herbaria, museums, preserved, dried or under inclusion and live plants bearing a label issued by a management body are the subject of loans, donations or exchange for non-commercial purposes, between men of science and scientific institutions registered by a management body.

02

Order No 067/PM of June 27, 2006 provides the organizational set-up and operational procedures of the Inter-ministerial Coordination and Monitoring Committee for the implementation of the CITES.

03

Decision No 104/D/MINFOF/SG/DF/SDAFF/SN of March 02, 2006 provides the designation and definition of the role of the CITES Scientific Authority in Cameroon.

04

Order N°055/CAB/PM of 6th July 2015 created the NIAP Committee in Cameroon, which includes members from relevant ministerial departments including the centralised and decentralised services of Cameroon Ministry of Forest and Wildlife (MINFOF), Prime Minister’s Office, Ministry of Territorial Administration, Ministry of External Relations, Ministry of Finance, Ministry of Justice, Ministry of Defence (Secretariat of State in charge of the Gendarmerie), General Directorate of National Security (Police) and Customs Administration.

Based on CITES requirements, Cameroon declared an export quota of 160 tusks (as hunting trophies from 80 animals) at the beginning of each year’s hunting season from 2007 to 2014.

In addition to the above-mentioned legislation, another important document for the particular management of elephant species in Cameroon is the Strategy and Program of Sustainable Management of Elephants in Cameroon 2011-2020, released by MINFOF. The Strategy aims to: 1) Reduce elephant poaching and trade in elephants; 2) Ensure the connectivity of elephant population habitats; 3) Improve knowledge of elephant populations and their habitats; 4) Gain public support for elephants; and 5) Mobilize sustainable funding for elephant conservation. The Strategy demonstrates the importance placed on elephant conservation in Cameroon, as well as the willingness of the government to improve the management of elephants to ensure sustainability.

As partially reflected in the above legislation and plan, current government agencies in Cameroon taking charge of wildlife trade management are outlined in Table 2-3.

[22]

Ibid.

\* This prerogative is not expressly mentioned in the Customs Code of the Central African Economic and Monetary Community (CEMAC), which Cameroon and Congo are part of. [22]

Table 2-3: Government Agencies in Cameroon Responsible for Wildlife Conservation and Trade Management

Government Agency (in English and French)	Roles and Responsibilities	Subordinate departments
Ministry of Forestry and Wildlife / Le Ministère des Forêts et de la Faune (MINFOF)	- Main government body promulgating direction and regulation of wildlife management - Management authority of CITES in Cameroon. - Judicial police officers with special competence (JPOSC) to carry out investigations related mainly to forestry and wildlife.	- Department of Wildlife and Protected Areas - Department of Wildlife Development and Exploitation - Department of Forests - Department of Licenses and Forest Taxation - Department of Forest Environment Intervention Standards
School of Fauna Garoua / Ecole de Faune de Garoua (EFG)	- Scientific authority of fauna section of CITES - Organize trainings for wildlife specialists and / or other stakeholders in the management and conservation of wildlife and protected areas. - Participate in the preparation of protected area management plans. - Ensuring the Cameroon government's scientific advice to CITES - Undertake/collaborate on wildlife research or other subject matter.	- Department of Botany and Habitat Management - Department of Ornithology, Taxidermy and Wetland - Department of Mammals and Wildlife Management - Department of Policy, Forest Governance and Participatory Management
National Forest Development Support Agency/Agence Nationale d'Appui au Développement Forestier (ANAFOR)	Scientific authority of flora section of CITES	N/A
Ministry of Livestock, Fisheries and Animal Industries / Ministère de l'Elevage, des Pêches et Industries Animales (MINEPIA)	Enforcement focal point for CITES	Department of Wildlife Valuation and Exploitation
Customs Administration [21]	- Enforcement of the regulation on cross-border movement of classified products under CITES and national legislation, and control of import and export quotas - Judicial police officers with special competence (JPOSC) to carry out arrests, raids, searches, and seizures*	N/A
Police and Gendarmerie	- Judicial Police Officer with General Competence (JPOGCs) that assists JPOSCs to carry out certain actions during preliminary investigation including arrests, raids, searches, and seizures, and can provide services to take offenders into custody when necessary - In the absence of a JPOSC at the location of infringement, the police and gendarmerie are entitled to carry out autonomous actions against wildlife offences	N/A

## 2.2 Congo

Congo joined CITES on January 31st, 1981, an agreement which legally entered into force on May 1st, 1983. Its wildlife protection and trade-related legislation included:

Table 2-4: Wildlife Legislation in Cameroon

Legislation	Main Content
Law 7-94 of June 1, 1994	CITES regulation on imports, exports and re-exports in the Congo.
Law No. 37-2008 of 28 November 2008	Fundamental law in Congo laying down the fundamental principles and general conditions for the sustainable conservation and management of wildlife animals, and the habitats and ecosystems on which it depends.
Law No. 34 - 2012 of October 31, 2012	Established the Congolese Wildlife and Protected Areas Agency (Agence Congolaise de la Faune et des Aires Protégées, ACFAP), to be responsible for wildlife conservation, management and trade.
Act 114/91 of 24 June 1991	Prohibit killing of elephants in Congo.
Decree 32/82 of 18 November 1991	Gives elephants the benefit of absolute protection.
Order 62-24 of 1962	Metes out severe punishments for trafficking of military weapons.
Order No. 3772, MAEF, DEFRN, BC17 from August 12, 1972	Defines the opening and closing of hunting seasons in the Republic of Congo.
Order No. 054/MATD/DS/P/SG/DDS.P of October 22, 2003	Prohibiting the sale and consumption of primates.
Order No. 6075/MDDEFE from April 9, 2011	Determines the wildlife species that are fully and partially protected.

Congo’s wildlife legislation system resembles that of Cameroon, with Law No. 37-2008 of 28 November 2008 governing wildlife management in Congo in general. The law sets forth the duty of sustainable wildlife management to the public, local authorities, private operators, associations and non-government organizations. It also encourages the establishment of a specialized association at the national, provincial and local levels to facilitate the implementation of such duties. The law also designates the Ministry of Forest Economy and Sustainable Development to administer the law as the “administration in charge of the waters and forests.”

[23]

Ingram, "Characterising Trafficking and Trade of Pangolins, "

[24]

"NIAP – Country – Congo," EIA Reports, accessed August 09, 2019. <https://reports.eia-international.org/niap/niap-country-congo/>.

Similar to Cameroon, according to Law No. 37-2008 of 28 November 2008 in Congo, wildlife animals are also classified into three categories: fully protected species, partially protected species and other species. The fully protected species are forbidden to be hunted, while hunting of partially protected species is allowed except for young and female animals. Order No. 6075/MDDEFE from April 9, 2011 assigns the wildlife species to fully and partially protected categories, but no public information has been found regarding the species list in this order. Literature from more recent years indicates that *P. tricuspis* and *S. gigantea* of pangolins and forest elephants are fully protected in Congo.<sup>[23],[24]</sup>

There are other acts that provide additional protection to particular species. For example, Act 114/91 of 24 June 1991 specifically prohibits the killing of elephants in Congo, and Decree 32/82 of 18 November 1991 gives elephants the benefit of absolute protection. Another species-specific regulation prohibiting the sale and consumption of primates is stated in Order No. 054/MATD/DS/P/SG/DDS.P of October 22, 2003.

Regular hunting of partially protected and other species in Congo, including sports hunting, scientific hunting, commercial hunting, and hunting within game ranches, etc., is allowed subject to a hunting permit or license. Order No. 3772, MAEF, DEFRN, BC17 from August 12, 1972 defines the opening and closing of hunting seasons in Congo.

The trophies and animal remains are the property of the hunter who may dispose of them freely, as set forth in Law No. 37-2008 of 28 November 2008. Traditional and village hunting, defined as hunting for individual and community needs, is allowed within a limited area, though within this specification, hunting protected animals is also prohibited. Under the law, “village hunters” must fall within the jurisdiction of a village association of hunters, which also requires a permit. The law also allows for the detention, circulation and export of protected animals, their trophies or their remains within the national territory, as long as a certificate of origin and an authorization export license were issued by a national authority in conformity with international conventions.

In general, it is illegal to hunt and trade pangolins and elephants. However, not all species of pangolins are considered under total protection, therefore leaving space for circumvention of the policy.

In cases of wildlife crime, Law No. 37-2008 of 28 November 2008 gives the “administration body of water and forests” the responsibility to take charge of policing against illicit wildlife hunting with assistance of village chiefs, local associations and eco-guards. When necessary, investigation, detection and searches on illicit hunting cases may require the aid of the public. Public action against the perpetrators of illicit wildlife hunting is exercised by the Public Prosecutor before the competent courts. The exercise of legal remedies, the execution of judgments and the limitation periods for offenses are governed and prescribed by the Code of Criminal Procedure in Congo.

Criminal offenses are liable to fines up to 5,000,000 CFA francs (~8,449 USD as of December 2019) and/or imprisonment ranging from one month to 5 years, depending on their severity. Slaughtering a fully protected animal, importing and exporting wildlife or their trophies in violation of this law or international conventions in force in the Congo and unlawfully detaining a protected animal are all within the more severe range of offenses and corresponding penalties. Despite these provisions, an analysis of Congo legislation elicits concerns that it does not provide sufficiently severe penalties for those crimes higher up in the illicit trade chain, compared to those that a poacher at a much lower level in the illicit trade chain would receive. Further, while there have been arrests for ivory trade-related offences, the penalties imposed are often weak and fail to serve as a deterrent.

A specific entity, Congolese Wildlife and Protected Areas Agency (Agence Congolaise de la Faune et des Aires Protégées, ACFAP), was created by Law No. 34 - 2012 of October 31, 2012 to take on the responsibilities of wildlife conservation, management and trade. Its specific responsibilities include:

- provide technical, scientific and administrative support to protected areas, surveillance & anti-poaching units and local councils, and ensure their coordination at the national level;
- develop sustainable financing mechanisms for protected areas and monitoring and anti-poaching units;
- contribute to the sustainable development and wellbeing of people living in and around protected areas and surveillance and anti-poaching;
- set up an information management system for wildlife, protected areas and monitoring and anti-poaching units.

CITES-related issues are addressed in Law 7-94 of June 1, 1994, regulating imports, exports and re-exports in the Republic of the Congo.

Table 2-5: Government Agencies in Congo Responsible for Wildlife Conservation and Trade Management

Government Agency (in English and French)	Main Roles and Responsibilities	Subordinate departments
Ministry of Forest Economy and Sustainable Development / Ministère de l'Economie Forestière et du Développement Durable (MEFDD)	- Management authority of CITES in Congo - Chair of scientific authority of CITES in Congo - Houses NIAP Focal Point - Design regulations and policies on sustainable wildlife and protected area management, ensure the implementation of these national policies as well as international treaties and conventions ratified by Congo, and maintain cooperative relations with national, regional and international agencies Promoting hunting activities and revitalizing wildlife industry.	- Department of Forest Economy (DGFE) - Fauna and Protected Areas Division (DFAP) - Congolese Wildlife and Protected Areas Agency (ACFAP)
Congolese Wildlife and Protected Areas Agency (ACFAP) *reports to MEFDD	Ensure the implementation of national wildlife management policy, protected areas and anti-poaching and monitoring units. It controls 17 protected areas, including four national parks, four wildlife reserves, biosphere and community reserves, etc. <sup>[25]</sup>	N/A

[25]

"Agence Congolaise De La Faune Et Des Aires Protégées : Le Budget 2016 S'élève à 590 Millions De FCFA," Page D'accueil, March 12, 2016, accessed August 09, 2019. <http://adiac-congo.com/content/agence-congolaise-de-la-faune-et-des-aires-protegees-le-buget-2016-seleve-590-millions-de>.

[26]

Sone NKOKE Christopher, Paulinus NGEH Chiambeng, and Nick AHLERS, Workshop Proceedings: *Subregional Action Planning to Strengthen Regional Collaboration—Support of the Implementation of National Ivory Action Plans (NIAPs) in Central Africa*, PDF, TRAFFIC, May 2016.

Compared to Cameroon, the responsibilities of wildlife management and trade-related issues are relatively concentrated within one government entity, the Ministry of Forest Economy and Sustainable Development. The two main directorates, the General Directorate of Forest Economy (DGFE) and the Directorate of Wildlife and Protected Areas (DFAP), play major roles in promulgating wildlife regulations and policies and ensuring their implementation and enforcement.

While the national police or gendarmerie are believed to play a role in investigations of wildlife crime cases, their respective roles are relatively unclear due to lack of recognition from literature. The customs agency is another government-regulated body that has not been mentioned much in wildlife related literature, indicating that Congo customs is not adequately involved in managing imports/exports and trafficking of wildlife products from the country. As reflected in Congo’s NIAP implementation, the lack of engagement and coordination between MEFDD and the police and the customs agency remains a challenge for Congo to effectively combat illicit trade of wildlife and their products.<sup>[26]</sup>

### 2.3 Summary

The legislation and policies in both Cameroon and Congo have evolved to give stronger protection to key species that are at risk of poaching and trafficking. Most elephants, pangolins and rhinoceros are given the highest level of protection in both countries, which means that hunting or trading of these species is highly restricted. There still exist exceptions to wildlife regulations, such as hunting of elephants with tusks heavier than 5 kg in Cameroon, for savanna elephants in Congo, as well as for certain species of pangolins not recognized in legal texts in both countries, thereby preventing them from being fully protected by law. These exceptions might allow for circumvention of the protection laws and result in difficulties in their enforcement.

Of note is the fact that both countries still permit wildlife hunting and hunting trophy trade, which both contribute revenues to the respective governments to enhance governance, development and conservation. Given this situation, efforts should be invested to reconcile the need for commercial utilization of wildlife and the control of increasingly rampant international trafficking.

In terms of government implementation, the government agencies involved in managing and executing wildlife trade and trafficking issues are relatively clearly defined in legal texts and literature in Cameroon, though a deeper analysis illustrates the remaining need to improve coordination among enforcement agencies. In Congo, coordination between MEFDD and other enforcement departments must be enhanced, both in legislation texts and in their actual functioning.

# 3 Regional Initiatives on Combating Wildlife Trafficking

## 3.1 Central African Forests Commission (COMIFAC) and COMIFAC Wildlife Trade Enforcement Action Plan (PAPECALF)

## 3.2 Extreme Emergency Anti-Poaching Plan (PEXULAB) and Emergency Anti-Poaching Action Plan (PAULAB)

As wildlife protection and trafficking are tied to not only national, regional cooperation should be considered as an opportunity for countries to strengthen joint enforcement and improve their policies and practices. In addition to national policies and initiatives in wildlife trade, both Cameroon and Congo benefit from involvement in regional cooperation platforms/mechanisms in which wildlife protection, management and trade are involved as significant topics. This section provides an overview of three of the main regional cooperation mechanisms in which Cameroon and Congo are involved.

### 3.1 Central African Forests Commission (COMIFAC) and COMIFAC Wildlife Trade Enforcement Action Plan (PAPECALF)

[27]

*Central African Forests Commission (COMIFAC). PDF. COMIFAC.*

COMIFAC is an intergovernmental organization that was created in 2000 by the heads of state of central African countries to take charge of directing, harmonizing and monitoring forest and environmental policies in the Central Africa region.<sup>[27]</sup> In 2012, the COMIFAC Wildlife Trade Enforcement Action Plan (PAPECALF<sup>[28]</sup>) was adopted by the Council of the Ministers of COMIFAC with the following objectives:

01

Strengthen cooperation and collaboration between supervisory authorities and the authorities related to the enforcement of wildlife laws at the national level, as well as between COMIFAC countries.

02

Increase investigations especially at key points of transit or at borders, in local markets, and in cross-border areas.

03

Put in place effective deterrents to combat poaching and illegal wildlife trade, ensure that lawsuits are conducted in a manner that is in accordance with national laws and that the results of the controls and prosecution are monitored, published and widely disseminated.

04

Raise awareness of the issues of the illegal wildlife trade.

[28]

*Plan D'action Sous-regionale Des Pays De L'espace Comifac Pour Le Renforcement De L'application Des Legislations Nationales Sur La Faune Sauvage (PAPECALF) 2012-2017. PDF. COMIFAC, 2012.*

Under each objective, the plan also specifies means and mechanisms through which these objectives may be implemented and achieved. For example, it suggests the establishment of a National Coordination Cell (NCC) in every country and the development of national action plans according to the PAPECALF. It also suggests the creation of a sub-working group on wildlife and protected areas (SGTFAP) to follow up with implementation. Importantly, the plan emphasizes the need to promote communication and exchanges, information management and sharing, as well as enforcement trainings and collaboration within and between the countries to deter illegal trade in the region.

Therefore, the action plan serves as a useful tool for regional coordination and cooperation on wildlife enforcement and is meant to be used as a guide for Cameroon and Congo to improve their national practices and cross-border cooperation on managing wildlife trade.



### 3.2 Extreme Emergency Anti-Poaching Plan (PEXULAB) and Emergency Anti-Poaching Action Plan (PAULAB)

[29]

The 11 member states are Angola, Burundi, Cameroon, Central Africa Republic, Chad, Congo, DRC, Equatorial Guinea, Gabon, Rwanda, and San Tome and Principe, "Présentation De La CEEAC," La CEEAC : Un Outil D'intégration Pour L'Afrique Centrale, accessed August 09, 2019. <http://www.ceeac-eccas.org/index.php/fr/a-propos-de-la-ceeac>.

[30]

"An Extreme Emergency Anti-Poaching Plan (PEXULAB) to Protect Elephants in ECCAS Countries Adopted in Yaounde," CBFP, accessed August 09,2019. [http://pfbc-cbfp.org/news\\_en/items/ECCAS-LAB-EN.html](http://pfbc-cbfp.org/news_en/items/ECCAS-LAB-EN.html).

[31]

*Subregional Action Planning to Strengthen Regional Collaboration--Support of the Implementation of National Ivory Action Plans (NIAPs) in Central Africa.*

[32]

*Déclaration Sur La Lutte Anti-Braconnage En Afrique Centrale.* PDF. March 2013.

PEXULAB and PAULAB were two plans developed in 2013 and executed by the Economic Community of Central African States (ECCAS), an inter-governmental economic entity that includes Cameroon and Congo among its total of 11 member states.<sup>[29]</sup>

PAXULAB, as an extreme emergency plan, was created as the result of an intense meeting in Yaoundé, Cameroon in which the ECCAS ministers of foreign affairs, defense and security issues, regional integration and wildlife protection got together with a large number of experts and NGOs to brainstorm solutions to an ecological scandal where over 400 elephants were killed in north Cameroon, northern and south-western CAR and the south of Chad. The overall aim of the adopted PAXULAB was to launch an emergency fight against elephant poaching in the savanna zone and the forest zone in Central Africa, through offensive and defensive approaches to neutralize poachers and secure the concerned zones. The plan was to foster collaboration between ECCAS governments and NGOs to fight against poaching through political willingness, data and information exchange, legal enforcement and awareness-raising. Furthermore, ECCAS countries called on main consumer countries and poaching countries of origin to make a commitment on contributing to the cut of consumption and poaching. Up to 1,000 soldiers were said to be mobilized to initiate joint military operations to save the last surviving savanna elephants. Additionally, as partial result of the Yaoundé meeting, Cameroon’s president, Mr. Paul Biya, agreed to serve as the highest authority in the sub-region and the spokesperson of the anti-poaching fight in Central Africa.<sup>[30]</sup>

While PEXULAB focused on addressing then-rampant elephant poaching in the main regions of Cameroon, Central Africa Republic and Chad, PAULAB was later developed to cover all ECCAS countries. In summary, PAULAB aims to work on anti-poaching, harmonizing legislation and effective application, sensitization and lobbying approaches in ECCAS countries to ensure reduction or the full elimination of illegal wildlife trade and realize effective biodiversity conservation.<sup>[31]</sup> Specific objectives included dismantling regional poaching and ivory trafficking networks, developing a permanent intelligence network on wildlife poaching and trafficking, strengthening cross-border cooperation in handling poaching records, supporting legal measures to enforce wildlife laws, enhancing active surveillance and controls as well as passive judicial treatments on wildlife infringement, among many others.<sup>[32]</sup>

# Challenges and Opportunities in Combatting Wildlife Trafficking in Cameroon and Congo

## 4.1 Main Issues

- 4.1.1 Contradictions and Ambiguities in Legislation and Policies
- 4.1.2 Lack of Updated Policies and Enforcement Capacity to Counter Wildlife Crime
- 4.1.3 Lack of Coordination and Collaboration between Different Departments

## 4.2 Opportunities

- 4.2.1 New Mechanisms for Conservation Finance
- 4.2.2 Existing Multilateral and Multi-stakeholder Collaboration
- 4.2.3 Working with Countries Further Down the Supply Chain

From a literature review of the current status of wildlife protection and trade, legislation and policies, government authorities, as well as regional cooperation status of Cameroon and Congo, a general observation is that legislation and policies in both countries have evolved to give ever stronger protection to key species that are at risk of international wildlife trade and trafficking. However, implementation and enforcement of these policies still remains lacking.

## 4.1 Main Issues

### 4.1.1 Contradictions and Ambiguities in Legislation and Policies

While hunting and trade of hunting trophies are permitted in both Cameroon and Congo in order to ensure revenue contribution from wildlife resources, it makes it more difficult to reconcile the need for commercial utilization of wildlife and the control of rampant wildlife crime. As the governments currently do not have the adequate stockpile management to help distinguish between legal and illegal trade of wildlife and its products, circumvention cannot be easily prohibited.

### 4.1.2 Lack of Updated Policies and Enforcement Capacity to Counter Wildlife Crime

Cases of trafficking incidents have continued to emerge over the past decade; they increasingly indicate the threat of organized crime. Currently in Cameroon and Congo, trafficking issues are mainly dealt with using provisions for hunting and trade of hunting trophies, but there is a lack of specific and stronger penalties and consequences to deter trafficking crimes. The loopholes in legislation also create issues for enforcement. In order to effectively prevent wildlife-related crimes, enforcement standards must catch up with the evolving criminal networks as well as more advanced technologies that are potentially being used by the criminals. Developing an intelligence database to aid different agencies in tracking poaching, trade and import/export information would serve as a positive development to further facilitate timely information exchange between different departments.

### 4.1.3 Lack of Coordination and Collaboration between Different Departments

While legislation and policies in both Cameroon and Congo indicate that both countries intend to foster inter-institutional collaboration to effectively combat illicit wildlife trade, the NIAPs of both countries indicate that in practice, this remains a challenge. Effective cooperation mechanisms need to be set up between the main wildlife management authority (MINFOF in Cameroon and MEFDD in Congo) with the respective police or gendarmerie agencies in order to deter poaching. Additionally, the customs administration must be looped into cooperative efforts in order to control illegal exports at various ports and borders, while the judicial court should be engaged in order to enhance penalties for wildlife crimes.

## 4.2 Opportunities

### 4.2.1 New Mechanisms for Conservation Finance

In the wake of increasing global momentum on conservation, Cameroon and Congo may benefit from joining innovative conservation initiatives to more sustainably manage and use their abundant ecosystem and wildlife resources. For example, instead of relying on sports hunting and trade of hunting trophies to ensure revenue, both countries could learn from other conservation finance mechanisms to obtain revenue for conservation efforts as well as to provide income for community livelihoods. Typical examples of similar conservation finance in Africa include the blue bond launched in Seychelles in late 2019 which will support the expansion of marine protected areas, improved governance of priority fisheries and the development of Seychelles’ blue economy.

### 4.2.2 Existing Multilateral and Multi-stakeholder Collaboration

Both the Cameroonian and Congolese governments have shown positive efforts in fostering cooperation with foreign governments and NGOs to tackle the issue of wildlife trafficking issues. Multilateral cooperation platforms such as PAPECALF, PEXULAB and PAULAB have worked on different aspects of wildlife issues, including the formation of transboundary anti-poaching collaboration, the draft of specific action plans to improve investigation, judicial procedures and awareness and the pledge of political commitments and appeals to demand side countries to jointly disrupt wildlife supply chains. NGOs such as The Last Great Ape organization (LAGA) and PALF have been working in Cameroon and Congo, respectively, in close cooperation with the government of each country on legal enforcement and prosecution of wildlife crimes. The two NGOs both exist within the network of Eco Activists for Governance and Law Enforcement (EAGLE), which carries out activities such as investigation, operations, court proceedings and penalties.

The willingness to cooperate with relevant stakeholders represents an opportunity for Cameroon and Congo to learn based on other entities’ related experiences and leverage more resources to help them tackle legislation implementation and enforcement issues within their countries. An attitude of openness toward input also can help each country to improve how they act upon the need to tackle the international wildlife trafficking supply chain.

### 4.2.3 Working with Countries Further Down the Supply Chain

Most of the recorded wildlife trafficking seizures from Cameroon and Congo are found to be destined for Asian countries, including Vietnam, Malaysia, Hong Kong SAR and mainland China. Despite their geographic distance, it is important for source, transit and consumer countries to establish a common-ground understanding of the legislation of the other “links” in the illegal wildlife supply chain and to ensure effective coordination amongst themselves.

Cross-country capacity building and collaboration could focus on the following areas:



- Policy learning and coordination, especially when the definition of illegality is different across supply chain countries;
- Enforcement skills and technology, such as the development of an intelligence database;
- Stockpile management of legal and illegal wildlife products;
- Inter-ministerial coordination mechanisms on awareness and responsibilities regarding wildlife crime;
- Cross-country coordination mechanisms.

Some of these countries farther along the supply chain have more robust experience with managing and controlling illicit wildlife trade and could therefore potentially provide assistance to Cameroon, Congo and other sourcing countries. For example, China made a pioneering commitment on a complete ivory trade ban effective in January 2018 through its Notice of the General Office of the State Council on the Orderly Cessation of Commercial Processing and Sale of Ivory and Ivory Products issued by the State Council. Since then, it has made significant investments in closing domestic markets, through enhancing inter-institutional cooperation and conducting special crackdown campaigns. These efforts have proven to be effective and can be shared with Cameroon, Congo and other African sourcing countries. Meanwhile, there was already a solid political signal for wildlife trade cooperation between China and Africa in the Forum on China-Africa Cooperation (FOCAC) Beijing Action Plan (2019-2021) formed during the 2018 FOCAC summit. Specifically, China committed to support African countries to protect wildlife resources, crack down on poaching and illegal trade in wildlife, foster capacity improvements and training opportunities and explore cooperation on demonstration projects.

Specific actions recommended for China to collaborate with Cameroon and Congo on wildlife management and combat trafficking include:

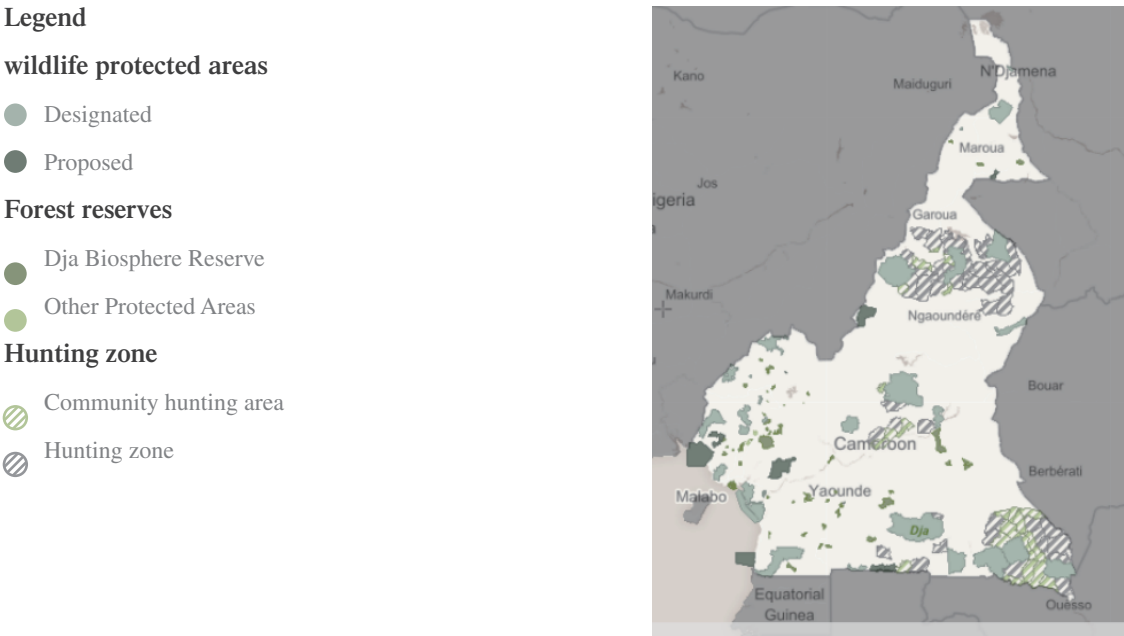
- Carry out policy exchanges for improved understanding on policy gaps and coordination;
- Carry out enforcement capacity building, enforcement technology exchanges, and develop information and intelligence sharing mechanisms;
- Raise awareness among Chinese tourists and workers in Cameroon and Congo, through Chinese embassy notices, airline and travel agency advertisements, and Chinese companies' code of conduct;
- Share experiences of conservation practices, including anti-poaching, patrolling and other management methods in national parks and protected areas, as well as community development mechanisms.

## References

01. "Agence Congolaise De La Faune Et Des Aires Protégées : Le Budget 2016 S'élève à 590 Millions De FCFA." Page D'accueil. March 12, 2016. Accessed August 09, 2019. <http://adiac-congo.com/content/agence-congolaise-de-la-faune-et-des-aires-protegees-le-budget-2016-seleve-590-millions-de>.
02. "An Extreme Emergency Anti-poaching Plan (PEXULAB) to Protect Elephants in ECCAS Countries Adopted in Yaounde." CBFP. Accessed August 09, 2019. [http://pfbp-cbfp.org/news\\_en/items/ECCAS-LAB-EN.html](http://pfbp-cbfp.org/news_en/items/ECCAS-LAB-EN.html).
03. Bale, Rachael. "Experts Explain How the Slaughter Could Have Happened in a Place like Botswana." National Geographic. September 04, 2018. Accessed August 09, 2019. <https://www.nationalgeographic.com/animals/2018/09/wildlife-watch-news-botswana-elephants-poaching/>.
04. "Central Africa 2016 African Elephant Status Report." [http://africanelephantdatabase.org/report/2016/Africa/Central\\_Africa](http://africanelephantdatabase.org/report/2016/Africa/Central_Africa).
05. *Central African Forests Commission (COMIFAC)*. PDF. COMIFAC.
06. Christopher, Sone NKOKE, Jean-Francois LAGROT, Stephane RINGUET, and Tom MILLIKEN. *IVORY MARKETS IN CENTRAL AFRICA Market Surveys in Cameroon, Central African Republic, Congo, Democratic Republic of the Congo and Gabon: 2007, 2009, 2014/2015*. PDF. TRAFFIC, September 2017.
07. Christopher, Sone NKOKE, Nya Fotseu Aime, and Ononino Alain Bernard. *Guide to Wildlife Law Enforcement, Cameroon*. PDF. WWF, January 9, 2018.
08. Christopher, Sone NKOKE, Paulinus NGEH Chiambeng, and Nick AHLERS. *Workshop Proceedings: Subregional Action Planning to Strengthen Regional Collaboration--Support of the Implementation of National Ivory Action Plans (NIAPs) in Central Africa*. PDF. TRAFFIC, May 2016.
09. "Congo Basin Forests." Greenpeace USA. Accessed August 09, 2019. <https://www.greenpeace.org/usa/forests/congo-basin/>.
10. *Déclaration Sur La Lutte Anti-Braconnage En Afrique Centrale*, PDF, March 2013.
11. Ingram, Daniel J., Drew T. Cronin, Daniel W.s. Challender, Dana M. Venditti, and Mary K. Gonder. "Characterising Trafficking and Trade of Pangolins in the Gulf of Guinea." *Global Ecology and Conservation* 17 (2019). doi:10.1016/j. gecco. 2019.e00576.
12. Ornellas, Paul De. *Securing Pangolin Strongholds: A Cameroon Case Study*. PPT. ZSL.
13. Pangolin Poaching in Africa and Trafficking to Asia. Accessed August 09, 2019. <https://www.ippmedia.com/en/features/pangolin-poaching-africa-and-trafficking-asia>.
14. *Plan D'action Sous-regional Des Pays De L'espace Comifac Pour Le Renforcement De L'application Des Legislations Nationales Sur La Faune Sauvage (PAPECALF) 2012-2017*. PDF. COMIFAC, 2012.
15. "Présentation De La CEEAC." La CEEAC : Un Outil D'intégration Pour L'Afrique Centrale. Accessed August 09, 2019. <http://www.ceeac-eccas.org/index.php/fr/a-propos-de-la-ceeac>.
16. S. Nguiffo, and M. Talla. *Cameroon's Wildlife Legislation: Local Custom Versus Legal Conception*. PDF. Italy: FAO, 2010.
17. STRATEGIE ET PROGRAMME DE GESTION DURABLE DES ELEPHANTS AU CAMEROUN 2011 - 2020. PDF. Bamenda: Cameroon Ministry of Forestry and Wildlife, January 2011.
18. Thouless, C. R., H. T. Dublin, J. J. Blanc, D. P. Skinner, T. E. Deniel, R. D. Taylor, F. Maisels, H. L. Frederick, and P. Bouche. "African Elephant Status Report 2016: An Update from the African Elephant Database." 2016. <https://www.iucn.org/content/african-elephant-status-report-2016-update-african-elephant-database>.
19. "TRIDOM Landing Page." WWF International. Accessed August 09, 2019. [http://www.wwf-congobasin.org/where\\_we\\_work/priority\\_places/tridom/](http://www.wwf-congobasin.org/where_we_work/priority_places/tridom/).
20. "NIAP – Country – Cameroon." EIA Reports. Accessed August 09, 2019. <https://reports.eia-international.org/niap/niap-country-cameroon/>.
21. "NIAP – Country – Congo." EIA Reports. Accessed August 09, 2019. <https://reports.eia-international.org/niap/niap-country-congo/>.

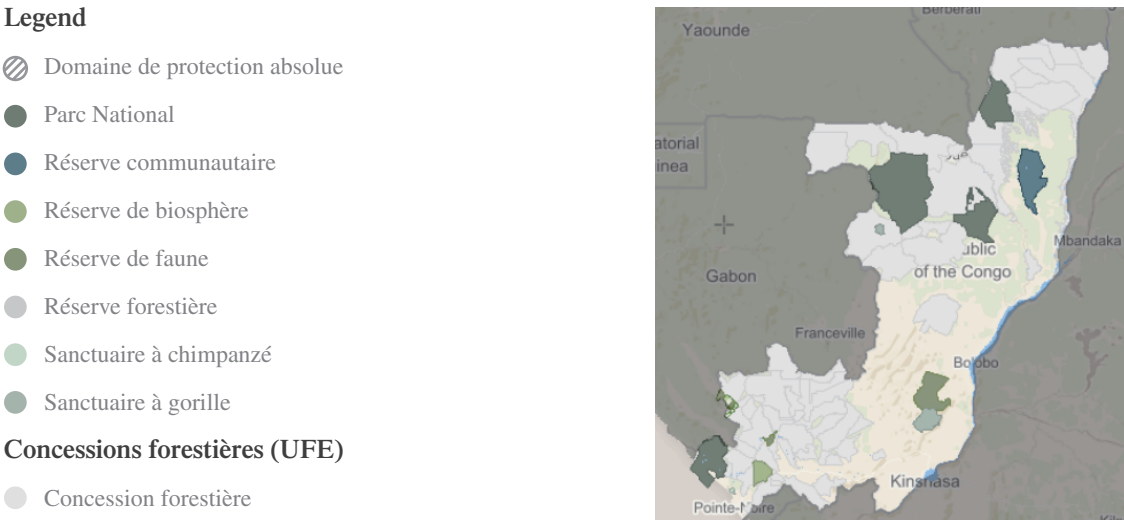
# Appendix

## I.Map of Cameroon Protected Areas, Forest Reserves, and Hunting Zones



Source: Forest Atlas Cameroon - MINFOF and World Resources Institute (WRI).

## II.Map of Congo Protected Areas, Forest Reserves, and Hunting Zones



Source: Forest Atlas Congo – MEFDD and WRI.