Legality Standards and Stepwise Approaches to Sustainable Forest Management in Central Africa: Challenges of Coordination and Communication

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RECOMMENDATIONS

COMIFAC and EU FLEGT should adopt a common, regional legality standard that incorporates existing systems.

Adoption of a common, regional legality standard and general set of indicators by COMIFAC and EU FLEGT could provide the basis for a regional export-licensing system. This system could address issues of timber laundering, demonstrate the region's commitment to reduce illegal logging, and assure markets in Europe and Asia that wood from Central Africa is being produced legally.

EU FLEGT should build on existing initiatives to develop a regional database and communication system to provide information on concession-level progress toward sustainability and the legality of forestry operations.

A regional database would provide the means for COMIFAC member countries to monitor progress toward the goals of the Convergence Plan, while FLEGT could use the system as a tool for the private sector and EU governments to facilitate easy access to information regarding licensing, legality, and progress toward sustainable forest management among concession owners in Central Africa.

INTRODUCTION

Despite regional efforts to facilitate communication and coordinate investment in the management of Congo Basin forests, there is still confusion over who is doing what with regard to the development of standards and systems for certifying the legality of timber production and sustainable forest management. This confusion is particularly prevalent with initiatives supporting a stepwise approach to forest certification—an approach that is intended to provide incentives for companies to incrementally improve their forest management practices towards sustainable forest management standards.

In Central Africa, a variety of initiatives have emerged to support stepwise approaches to forest certification. In essence, a competitive market has formed, in which various actors are using different standards, measures, indicators, systems, and processes for certification. This market competition may eventually give rise to a superior certification system, but at least initially, companies, governments, consumers, and other stakeholders are finding it difficult to understand the diversity of standards and approaches, and to make choices that reward companies and countries for operating legally and making progress in the direction of sustainable forest harvesting and production.

"Forest industries and some Governments are concerned that competition between certification systems could be harming the image of forest products in general by confusing consumers, thus actually discouraging the sound use of wood. Some major certification systems lack mutual recognition with other major systems in the UNECE region, leading some forest owners to certify their forests by multiple systems." (FAO 2003)

Development of standards demonstrating legality of logging operations is generally considered to be the first step in stepwise approaches to forest certification. Limited coordination and harmonization in the development of legality standards for Congo Basin forests are resulting in redundant efforts, increased costs, and reduced transparency. Moreover, confusion concerning the various standards and measures of legality and sustainability—and the comparability and/or compatibility between them—is making it harder to engage the stakeholders targeted by stepwise approaches to sustainable forest management (SFM).

WRI's experience in developing an independent and voluntary forest concession monitoring system for Central Africa (FORCOMS), in partnership with the World Conservation Union (IUCN) and the Interafrican Forest Industries Association (IFIA), has provided some insights that could move companies toward more sustainable forest management. This brief begins by defining and explaining stepwise approaches to legality and SFM certifications. It proceeds to describe the initiatives supporting stepwise approaches in Central Africa along with regional initiatives addressing illegal logging and governance issues across the region. Finally, it sets out two recommendations for action to increase the effectiveness of these efforts through improved communication and coordination.

WHAT IS A STEPWISE APPROACH TO SUSTAINABLE FOREST MANAGEMENT AND FOREST CERTIFICATION?

To date, internationally accepted certification schemes, such as the Forest Stewards Council (FSC) and the Pan European Forest Council (PEFC), have tended to attract timber companies with relatively good management practices and technical capacity. To attract participation from companies requiring more substantial improvements in management practices,[1] certification schemes are now moving to incorporate standards and processes that provide for a stepwise approach to achieving sustainability of forestry operations.

Stepwise approaches allow time for companies with limited technical and financial capacity to strengthen this capacity and implement improved monitoring and management systems. By 1) spreading the investment in these systems over time, 2) allowing for a smaller initial financial outlay, and 3) offering appropriate incentives (such as increased market access or premium prices), stepwise approaches could provide

increased benefits for companies that have not yet reached the full standards of legality and SFM, but have demonstrated their commitment to reaching these standards within a fixed time frame.

Stepwise approaches feature benchmarks that measure progress toward sustainable forest management at the level of forest concessions, and incorporate a plan for companies to achieve these benchmarks within a given timeframe. They generally measure forest operations in terms of :
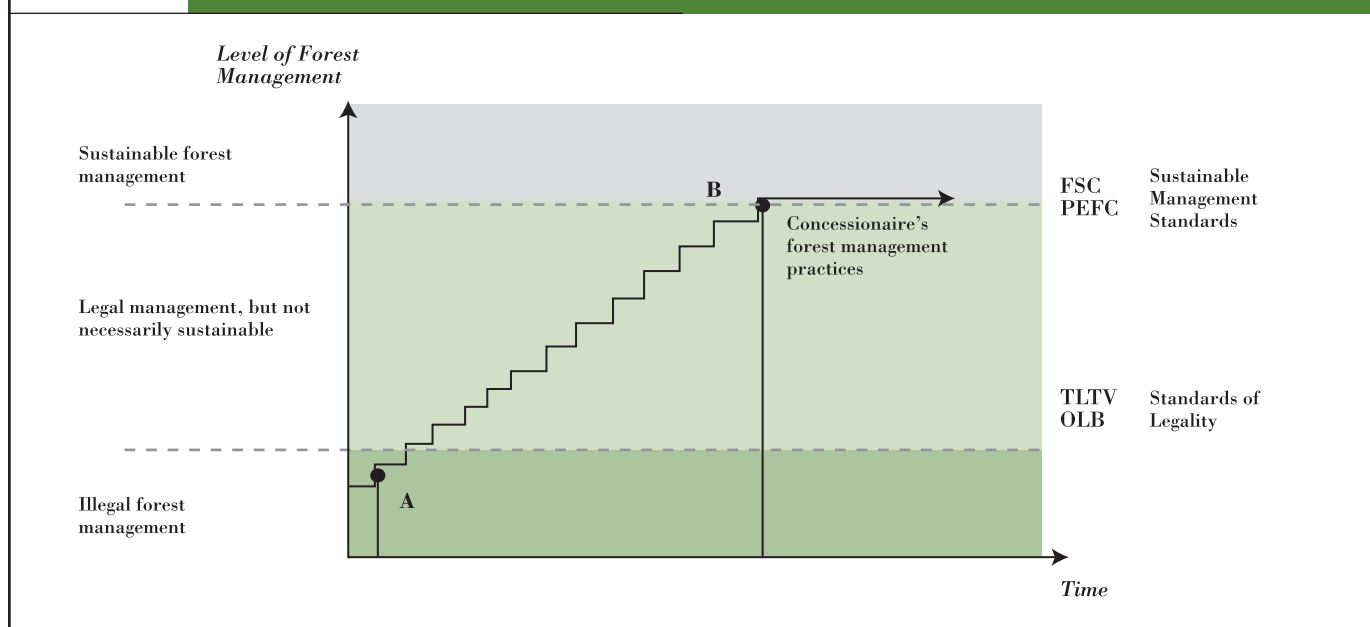
1. Legality of forestry operations — based on a legality standard, set of indicators, and means of verification grounded in the national laws of the producing country;

2. Demonstrated chain of custody — based on a system for tracking timber and wood products; and,

3. Sustainability of forestry operations — based on indicators of environmental, social, and cultural impacts.

There are variations in stepwise approaches to SFM certification, but they all involve: an initial independent assessment of current practices and the gap between these practices and some standard of sustainable management; development of an action plan to address these gaps; and, some verification process to assess progress toward the standard.

Supporters of stepwise approaches point to the potential of such approaches to encourage timber producers to incrementally improve their forest management practices (represented as the spectrum from A to B, in Figure 1). Critics of this approach emphasize the risks of setting the bar too low and allowing timber companies to continue using unsustainable forest management practices. However, many of these systems require that timber companies continue to demonstrate improvements in practices until the full standards of certification are met. These are often accompanied with specific timelines for completing this progression.

STEPWISE APPROACHES TO SFM CERTIFICATION IN CENTRAL AFRICA

In Central Africa, a variety of initiatives have emerged to develop legality standards, monitor forestry, support SFM certification, and encourage stepwise approaches to certification. These initiatives can be grouped into those directly supporting stepwise approaches and those addressing regional issues of illegal logging and forest governance.

FIGURE 1   Stepwise Approaches to Sustainable Forest Management

Initiatives Directly Supporting Stepwise Approaches to SFM and Certification

Initiatives supporting stepwise approaches to sustainable forest management and forest certification focus on creating incentives for and building the capacity of timber concession owners to participate in these systems. International nongovernmental organizations (NGOs) and some private enterprises are playing a variety of roles in promoting this approach (see Tables 1 and 2), including:

- Creating financial incentives and/or benefits for private companies that are not currently at the FSC standard of forest operations, but have committed to improving the management of forests under their control;

- Developing standards and indicators to provide a framework to measure progress toward more sustainable forest management;

- Developing monitoring and auditing systems to measure progress;

- Creating ways to communicate commitment and progress (paper certificates and websites) to consumers and timber purchasers; and,

- Providing subsidized technical expertise and training to private companies to improve management systems and practices.

One of the first steps in clarifying the roles of the various initiatives supporting certification and stepwise approaches to certification is identifying the services offered by various organizations and initiatives (see Table 2). There are currently two sustainable forest management certification systems operational in Central Africa: the Forest Stewards Council (FSC) and the Pan European Forest Council (PEFC). Both these councils accredit organizations to issue certifications concerning conformance to their SFM standards.[3] WWF (Global Forest & Trade Network) and the RainForest Alliance (Smartstep) are the only organizations that support a comprehensive, stepwise approach to sustainable forest management (based on FSC standards) within a 5-year timeline.

Recently, increased attention has been given to the development of standards and indicators of legality for Central African countries, largely due to the influence of international and regional initiatives targeting illegal logging in this region. Several organizations are developing standards of legality (see Table 2), with means of verification corresponding to national laws and regulations. In addition to these standards, the European Union's Forest Law Enforcement, Governance and Trade (FLEGT) program is developing indicators and criteria for legality, and national governments are in the process of developing and adopting International Tropical Timber Organization (ITTO) Principles, Criteria, and Indicators (PC&I) for SFM for each country.

Table 1   EXAMPLES OF INITIATIVES SUPPORTING STEPWISE APPROACHES TO SFM AND CERTIFICATION CENTRAL AFRICA

SYSTEM/ INITIATIVE	DESCRIPTION	STANDARDS AND INDICATORS USED	MONITORING AND AUDITING SYSTEMS	CAPACITY BUILDING	INCENTIVES AND BENEFITS
FSC and FSC Controlled wood	The Forest Stewardship Council (FSC) is an international network to promote responsible management of the world's forests. FSC has developed internationally recognized certification standards (FSC Forest Management Certification) and has recently developed new standards allowing companies and forest managers to avoid wood from undesirable sources in their supply chain (FSC controlled wood). FSC controlled wood may, in some cases, serve as a step up towards FSC certification. www.fsc.org	FSC Controlled wood standards (FSC-STD-40-005) FSC-STD-30-010)	Sets the standards and authorizes other firms to provide third party audits against these standards.	—	Access to markets and premiums for timber that is certified as Sustainably Harvested or Controlled Wood certified.
WWF's GFTN	The World Wildlife Fund's Global Forest and Trade Network (GFTN) Upon joining, forest management and production companies commit to become independently certified within a pre-defined time period and must develop a work plan with specific performance objectives. WWF has also recently partnered with TRAFFIC to develop standards and indicators of legality in five Congo Basin countries. www.panda.org/gftn	FSC Principles and Criteria Developing standards (criteria and indicators) for legality	Monitors progress through auditing of performance objectives related to FSC indicators and promotes the use of a Modular Implementation and Verification toolkit	Provides technical support and timeframe for reaching FSC-SFM certification	• Information and technical assistance to improve forest management and achieve comprehensive certification. • Market incentives for the pursuit of certification • Support of advocacy efforts for changes to legislation and law enforcement, and • Access to affordable, long term financing • Assistance in establishing new contacts with GFTN buyers committed to purchasing from sources either credibly certified or progressing towards certification in line with GFTN requirements.
Rainforest Alliance -SmartStep	The Rainforest Alliance is an FSC accredited certification body that has developed a service called SmartStep to provide more opportunities and incentives for forest management operations to pursue FSC certification. Companies joining SmartStep must commit to FSC certification within five years and agree to periodic auditing and demonstrate progress towards sustainability. SmartStep is designed to provide forest management operations with a clear path to achieving Forest Stewardship Council (FSC) certification while gaining access to potential market benefits before reaching certification. http://www.rainforest-alliance.org/programs/forestry/smartwood/index.html	FSC FSC Controlled wood standards (FSC-STD-40-005) FSC-STD-30-010) Developing standards (criteria and indicators for legality)	Provides 3rd party independent auditing of progress through auditing of performance objectives related to FSC indicators over five years	—	Actively marketing in addition to promotional use of the Rainforest Alliance and SmartWood logos to create a market and access to benefits before reaching certification.

Issues "Participation Statement" that defines the scope and validity of participation. |
| Tropical Forest Trust - Forest Management Sub Programs | The Forest Management Sub Program of TFT helps its members to implement responsible wood procurement policies in the tropics. The TFT helps its members to manage and monitor their supply chains and it helps the forests that anchor those supply chains to achieve FSC certification. TFT scopes whether the forest area has the potential to supply TFT members with timber and to achieve FSC certification. It works with forest owners to conduct gap assessments, develop Certification Action Plans (CAP) and enters into a MOU with the forest owner for implementation of the plan. http://www.tropicalforesttrust.com/projects/program.htm | FSC principles and criteria | Relies on other third party FSC standard auditing | Provides support in CAP development and implementation, along with post certification monitoring and support | • Preferred access to TFT member market • Information and technical assistance to improve forest management and achieve comprehensive certification. |

Table 1   *continued*

SYSTEM/ INITIATIVE	DESCRIPTION	STANDARDS AND INDICATORS USED	MONITORING AND AUDITING SYSTEMS	CAPACITY BUILDING	INCENTIVES AND BENEFITS
TFF's Reduced Impact Logging	The Tropical Forest Foundation's Reduced Impact Logging (RIL) verified program is an effort to partner producers and consumers; track the origin of wood; and verify legality and reduced impact logging practices. The RIL-verified Program does not have the specific objective of positioning companies to become certified. Nevertheless, this effort teaches sustainable forest management and legality through verification and recognizes those companies participating in sustainable forest management practices — important building blocks that could lead to eventual forest certification. **www.tropicalforestfoundation.org**	Guidelines for reduced impact logging — not associated with any certification scheme	Self-monitored Has asked 3rd party auditors to verify source origin.	Training provided for implementing reduced impact logging	• cost savings in forest operations • reduced negative social and environmental impacts • potential increased market access
SGS Certification Support Program	SGS Certification Support Programme (CSP) serves to bridge the gap between current logging practices and forest certification using a formal auditing program that provides a stepwise approach in line with the WWF Global Forest & Trade Network (GFTN). The SGS (M) CSP provides auditing of continual improvement based on an agreed schedule and allows trading of raw material and manufactured products under a CSP Certificate of Origin during development and implementation of the forest management system. **http://www.sgs.com/forest_services_?serviceId=8535& lobId=5548**	FSC, ITTO	Monitors progress through auditing of performance objectives related to FSC indicators	Provides development of plan to reach certification and timeline	Provides certificate of origin during the development and implementation of the forest management system designed to open access to markets
BVQI-EuroCertifor	BVQI- EUROCERTIFOR is an auditing and certification firm that has developed a certification of legality of origin (OLB) system. It could be used as a part of a stepwise approach to full forest management certification. **http://www.bvqi.fr/webapp/servlet/RequestHandler?mode =PT&pageID=24786&nextpage=siteFrameset.jsp**	Legality standards developed on basis of national laws (not directly linked with an SFM standard)	Provides OLB and FSC auditing services	—	Certification of legality is designed to open access to markets
FORCOMS	IUCN, WRI and IFIA is developing an independent voluntary forest concession monitoring system (FORCOMS) involving the participatory development of indicators and standards of legality and sustainable management, development of a database, and a website to communicate progress of timber companies towards sustainable forest management. **www.globalforestwatch.org/english/index.htm**	FORCOMS standards, indicators and means of verification (loosely based on ITTO criteria and indicators)	Self reporting, subsidized project auditing and optional audits by 3rd party auditing firms	—	Potential increased market access through better communication of status of forest operations

While overall standards for sustainable forest management certification in Central Africa have two standard bearers (FSC and PEFC), evaluating the various systems designed to demonstrate legality of forest operations is more difficult. Examination of the indicators and criteria developed by SGS (Société Generale de Surveillance), BVQI (Bureau Veritas Quality International), FORCOMS, and others reveals major differences with respect to the means of verification. The FORCOMS system gives an initial assessment relying mostly on documentation, while the BVQI and SGS standards provide a more thorough system for evaluating legality, which, if the standards are met, results in a legality certification. Other organizations are in the midst of developing criteria and indicators of legality, involving varying levels of coordination with related initiatives and existing standards.

Table 2   SERVICES RELATED TO SFM AND LEGALITY CERTIFICICATION

ORGANIZATION/PROGRAM	SFM ACCREDITING AGENCIES	DEVELOPING STANDARDS FOR SFM	DEVELOPING DEFINITIONS AND INDICATORS OF LEGALITY	PROVIDING CAPACITY BUILDING FOR SFM CERTIFICATION	SFM AUDITING SERVICES	ISSUING CERTIFICATIONS OF SFM	ISSUING CERTIFICATION OF LEGALITY	MONITORING SYSTEM	DATABASE/ WEBSITE
FSC and FSC Controlled wood	X	X						X	X
PEFC	X	X						X	X
WWF's GFTN			(X)	X				X	X
Rainforest Alliance -SmartStep			(X)		X	X		X	X
Tropical Forest Trust - Forest Management Sub Programs			(X)	X					X
TFF's Reduced Impact logging				X					
SGS Certification Support Program			X		X	X	X		
BVQI-EuroCertifor			X		X	X	X		
FORCOMS	X	X						X	(X)

* (X) Indicates the service is in development

International and Regional Initiatives Targeting Illegal Logging and Forest Governance in Central Africa

Initiatives supporting stepwise approaches to forest certification in Central Africa are being developed in a context of growing recognition of and concern about the impacts of illegal logging on forest ecosystems, adjacent communities, and national economies. Countries and regions that are consumers of forest products (particularly the European Union and the United States), timber-producing countries across Central Africa, and NGOs have initiated actions to combat illegal logging and address sustainable forest management and governance issues across the Congo Basin (see Table 3). Because of their scope and scale of operation, two initiatives—COMIFAC and FLEGT—are of particular interest to proponents of stepwise approaches to SFM and certification.

Central Africa Forest Commission (COMIFAC)

One key mechanism for efforts to promote sustainable forest management in the region is the Central Africa Forest Commission (COMIFAC),[4] the principal instrument for implementation of the Declaration of Yaoundé.[5] COMIFAC is made up of the ministers in charge of forests in the various signatory countries. In 2004, Central African countries endorsed COMIFAC as the political and technical commission charged with orienting, coordinating, monitoring, and harmonizing the different strategies and initiatives pertaining to the forest sector in the Congo Basin.

COMIFAC has developed a convergence plan for the conservation and sustainable development of Central Africa's forests. Of the 10 strategic axes of the convergence plan, stepwise systems could most notably contribute to strategic axes 5 and 7, that is, sustainable use of forest resources, and capacity building, participation, information, and training, respectively. To operationalize these strategic axes, the executive secretariat and technical subcommittee are developing regional and national operational components that provide the framework for implementing the convergence plan.

Forest Law Enforcement, Governance and Trade (FLEGT)

In February 2002, the European Union committed to developing an action plan to combat illegal logging, focusing on demand-side measures impacting trade with the EU. This Forest Law Enforcement, Governance and Trade (FLEGT) process centers on five principal implementing mechanisms:

1. Volunteer Partnership Agreements (VPAs) — voluntary bilateral agreements between the EU and timber-producing countries that set out actions to be undertaken by each party to combat illegal logging

Table 3   INTERNATIONAL AND REGIONAL INITIATIVES TARGETING SFM AND ILLEGAL LOGGING IN CENTRAL AFRICA

INITIATIVE	OBJECTIVE	GEOGRAPHIC REGION	MAJOR ACTIVITIES	IMPLEMENTING INSTITUTIONS
CBFP **Congo Basin Forest Partnership**	Coordinate and facilitate communication between projects and investment in the sustainable management of the forests of the Congo Basin	Congo Basin	Member meetings; Web site; other communication tools	30 governmental and nongovernmental organizations
COMIFAC/ CEFDHAC	Harmonize forest policy and management across the Congo Basin	Congo Basin	Interministerial meetings; COMIFAC Secretariat; Convergence plan	Central African national governments
AFLEG **Africa Forest Law Enforcement and Governance process**	Eliminate illegal logging and associated trade and corruption in Africa's forests	Continent-wide	Interministerial meeting, Yaoundé 2003 Ministerial Declarations	International donor community and African national governments
FLEGT **Forest Law Enforcement, governance and Trade**	Combat illegal logging through curtailing trade in illegally-logged timber to the EU	World-wide	Action plan approved October 2003; Timber licensing and VPAs; Public procurement; Private sector initiatives (including codes of conduct); Financing logging projects	European Union; Developing countries' national governments
CARPE **Central Africa Regional Program for the Environment (USAID)**	Reduce the rate of forest degradation and loss of biodiversity through increased local, national, and regional natural resource management capacity	Congo Basin	Development and implementation of integrated land use plans in 11 priority landscapes for biodiversity conservation across the Congo Basin; Development of monitoring system for monitoring illegal logging; Improved forest governance	USAID-CARPE; International conservation and development NGOs
OAB/ITTO Principles, Criteria and Indicators PCI's	Promote the wide scale implementation of sustainable management in tropical member countries	Tropical forested countries	Develop national criteria and indicators for sustainable tropical forest management and provide training on the use of monitoring, assessing and reporting on forest management	United Nations; International Tropical Timber Organization
FORAF **African Forests Observatory**	Build regional information gathering capacity; Support effective decision-making for sustainable forest management	Continent-wide	Development of a State of African Tropical Forests Report; Development of thematic natural environment monitoring systems; Development of a forest observatory	EU Implementing partners TBD
VERIFOR	Research project to help develop institutional options for verification which are country-specific, nationally owned, socially inclusive, and good governance oriented	Tropical forested countries	Research designed to assist countries to put in place verification systems to ensure that forest and timber products are harvested legally	ODI Research partners: CIFOR CATIE RECOFTC

2. Timber licensing — development of systems in producer countries to ensure legal harvesting of round wood and rough sawn wood destined for export to the EU

3. Public procurement policies — inclusion of provisions that prohibit government purchase of unverified or illegal timber products

4. Private-sector initiatives (including codes of conduct) — private procurement policies and codes of conduct that prohibit trade in illegal timber products

5. Financing capacity-building activities— increased financial support to build producer countries' capacity to monitor and enforce forest management laws and policy

With the FLEGT process underway, Central African governments choosing to enter into VPAs with the EU must develop licensing systems to ensure that wood exported to the EU has been harvested legally. Experience with the development of stepwise approaches to forest certification, indicators, and standards of legality could contribute substantially to the development of licensing systems under the FLEGT program. The development of licensing systems would also go a long way toward supporting the first step in stepwise approaches to certification, which is generally considered to be demonstrating legality.

The number of initiatives and the scale of resources being directed toward the issues of sustainable forest management,

illegal logging, and forest certification speak to the importance of these issues in Central Africa and worldwide. The sheer multitude of responses has given rise to some challenges of communication and coordination. While initiatives such as the Congo Basin Forest Partnership (CBFP) and COMIFAC address communication and coordination, additional steps that expand on existing mechanisms could contribute importantly to efforts to address illegal logging and encourage more sustainable forest management.

ADDRESSING COORDINATION AND COMMUNICATION CHALLENGES: SOME RECOMMENDATIONS

Given current initiatives and existing mechanisms in the Congo Basin region, considerable opportunities exist to improve the effectiveness of efforts in support of stepwise approaches to forest certification and SFM. There is a clear need to reduce redundancy, lower costs, increase transparency, and finally provide consumers with concise, standardized information that is both credible and easily comparable across companies, concessions, regions, and certification schemes. Two possible ways forward appear to have particular potential for addressing current challenges:

1. COMIFAC AND EU FLEGT SHOULD ADOPT A COMMON, REGIONAL LEGALITY STANDARD THAT INCORPORATES EXISTING SYSTEMS.

A common regional framework or standard could both coordinate investment and provide a basis for harmonizing national licensing systems, thus increasing the efficiency of certification systems and their ability to diminish international trade in illegal logs.

One of the key strengths of the FLEGT program is at the same time its limitation: that is, its voluntary nature. FLEGT does not apply to countries that decline to enter into VPAs. This means that timber illegally harvested in VPA countries could find its way to international markets via export from neighboring (non-VPA) countries that do not require legality licenses. It also implies the possibility of "timber laundering"—that is, transporting illegal logs from non-VPA countries into VPA signatory countries, from which the wood could be exported as legal. A coordinated licensing policy across COMIFAC countries, monitored by third parties, could help ensure the legality of all timber exports, if it is accompanied by adequate monitoring and enforcement. Such a coordinated system

would provide a more efficient and effective means of stemming the flow of illegal logs outside the country of origin.

Another limitation of the FLEGT program is its focus on trade with the EU. While hardwood exports from Central and West Africa have traditionally gone primarily to European markets, trade patterns have begun to shift. According to the ITTO, China's imports of tropical logs have almost tripled since the 1990s. Given China's internal ban on domestic harvesting, its expanding economy, and its lack of tariffs on imported logs, demand for tropical timber will likely continue to grow. Gabon and the Republic of the Congo are among the countries supplying the majority of these hardwood logs. Between 1999 and 2004, the volume of logs exported from Central Africa to China increased by 30 percent. Moreover, hardwoods imported into India (the world's second largest import market) are increasingly coming from Africa.

Limiting access to the European market will provide little incentives for companies that can easily switch to Asian markets. To increase their effectiveness, current efforts to encourage procurement policies and import policies should heighten their emphasis on Asian (and African) markets for hardwood, where incremental changes could have a substantial impact on incentives for timber producers and exporting governments.

Adoption by COMIFAC and EU FLEGT of a common, regional legality standard and general set of indicators could provide the basis for a regional export-licensing system. This system could address issues of timber laundering, demonstrate the region's commitment to reduce illegal logging, and assure markets in Europe and Asia that wood from Central Africa is being legally produced.

A common regional framework for legality would also simplify communication of information on the state of private-sector forestry operations in Central Africa to international markets and consumers. It would provide a common framework for the negotiation of VPAs between the EU and Central African countries. Existing standards and systems for monitoring legality could be related to this regional standard relatively easily.

Existing systems are similar enough that the development of this regional legality standard and set of indicators could likely be accomplished through a single workshop, with

some follow-up.[6] A natural starting place for the development and adoption of this regional standard of legality is the FORCOMS system, which has already developed, through a participatory process, a regional framework of indicators that has been adapted to several countries in the Central African region.

As the regional organization charged with coordinating forest-sector initiatives across the Congo Basin, COMIFAC is well placed to facilitate the adoption of common standards. This inter-ministerial commission has both the political standing and mandate to take on such an initiative. Its Convergence Plan, along with national and regional operational strategies, presents a good opportunity to develop regional standards and ensure their compatibility with national legal systems.

One promising way forward would be for the recently established COMIFAC-FLEGT working group to convene a workshop, bringing together the various groups engaged in the development of standards for legality and sustainable forest management. Such a workshop would have as its goal the development of a single, overall standard and general set of indicators of legality, encompassing the variety of existing systems. This standard could be used as an umbrella standard by COMIFAC member countries to develop national licensing systems (based on national laws) within a common regional framework.

The number of donor-funded initiatives engaged in developing legality standards makes it likely that resources and time will be wasted if these efforts are not coordinated. While responsibility for ensuring coordination rests with each stakeholder, the COMIFAC-FLEGT working group seems well placed to take on a key role in improving communication and coordination between institutions addressing issues of legality of forest operations.

2. EU FLEGT SHOULD BUILD ON EXISTING INITIATIVES TO DEVELOP A REGIONAL DATABASE AND COMMUNICATION SYSTEM TO PROVIDE INFORMATION ON CONCESSION-LEVEL PROGRESS TOWARD SUSTAINABILITY AND THE LEGALITY OF FORESTRY OPERATIONS.

Despite growing interest from national governments and international companies in sourcing legal and sustainably harvested wood products, there is no central system that pro-

vides consumers with a means to ascertain whether forestry companies or concessions in Central Africa are engaged in sustainable forest management, legality of forest operations, SFM certifications, etc.

Initiatives across the region are generating increasing amounts of information regarding the legality and sustainability of forest management across the Congo Basin. At the national level, efforts are underway by Central Africa governments to increase the use of spatially-referenced information and analysis to improve forest management and monitoring.[7] The CBFP State of the Forest Report, CARPE mapping of priority landscapes, WRI interactive forest atlases, and the European Union's upcoming FORAF initiative all include (or are developing) significant databases and communication systems. FSC, PEFC, WWF, GFTN, WRI, and others maintain websites with information on concession-level sustainability and legality issues in Central Africa. These initiatives could be used as building blocks for a forest information framework, focused on providing relevant information on the state of forest management in the Congo Basin region—at the level of timber companies and forest concessions—to countries importing wood products as well as purchasers wanting to source legal and SFM wood products.

Both COMIFAC and FLEGT could benefit from the development of a single, centralized system. COMIFAC member countries could use the system to monitor progress toward the goals of the Convergence Plan, while FLEGT could use the system as a tool for the private sector and EU governments to facilitate easy access to information regarding licensing, legality, and progress toward sustainable forest management among concession owners in Central Africa.

Integrating spatial information regarding the attainment of legality certification, sustainable forest management certification (FSC, PEFC, or FORCOMS), and other indicators of legality is technically straightforward and has already begun. The challenge now is to simplify the communication system, so that information on progress toward SFM and legality can be found in an easily accessible database and compared across a variety of certification systems.

As part of its regional efforts in Central Africa, the EU FLEGT should consider funding the design and implementation of a regional database and communication system focused on providing information regarding concession-level progress to-

ward sustainability and the legality of forestry operations. The system should be tested in a Central African country where information is relatively easily available (such as Cameroon) and carried out under the auspices of the regional framework provided by COMIFAC.

COMIFAC's role in harmonizing forestry policy and management across the Congo Basin makes it central to the success of any effort to address the many challenges of SFM across Central Africa. Adoption by COMIFAC of a regional standard for legality (such as the FORCOMS standard), along with coordinated national licensing systems, could simplify and strengthen incentives for legal logging throughout the Congo Basin. Improved coordination between donors and organizations developing measures of legality would save time and resources. A regional monitoring and information management system, accompanied by a database and website, would provide the means to rationally compare performance across concessions, companies, and countries, and help consumers (including companies, governments, and individuals) make more informed choices in their purchases of tropical forest products.

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ENDNOTES

1. This could include small and medium-sized companies, companies with newly acquired concessions, or companies that historically have not engaged in SFM practices.

2. Adapted from http://www.metafore.org/index.php?p=Stepwise+approach&s=174 and the listed websites.

3. FSC has two accredited national initiatives in the Central Africa region (Cameroon and Gabon), but no approved national standards. PEFC is considering the accreditation of the Pan African Forest Certification (PAFC) system in Gabon.

4. Formerly the Conference of Ministers for Forests of Central Africa.

5. In March 1999, Central African heads of state produced a joint statement outlining 12 resolutions concerning the conservation and sustainable management of forest ecosystems in the Congo Basin.

6. In fact, the FORCOMS process (see Annex) initially developed a regional set of indicators that could be adapted to integrate national and institutional standards that have been developed since 2005.

7. For example, WRI's Global Forest Watch is working with national governments in Cameroon and Congo to develop interactive forestry atlases and strengthen national capacity to develop and use spatial information in support of improved forest management.

ANNEX THE FORCOMS SYSTEM

Since 2004, the World Resources Institute (WRI), the World Conservation Union (IUCN) and the InterAfrican Forest Industries Association (IFIA) have been collaborating on the development and implementation of an independent forest concession monitoring system (FORCOMS) that would allow concession owners operating legally and moving toward sustainability in Central Africa to communicate to the international markets, their commitment to legality and sustainable forest management.

The development of the FORCOMS system is still ongoing. Its foundation has been the participatory development of a set of indicators of legality and sustainability that can be applied across the countries of the Congo Basin (largely based on ITTO's Principle Criteria and Indicators). These indicators form the basis of a set of specific country referentials (relating individual countries' laws and management requirements to the more general indicators) and means of verification (which list the actual documents and information sources in a country that should be consulted), that can be used to assess compliance with national laws and progress toward sustainability in commercial forest concession activities.

The FORCOMS system is based on four operating principles:

1. It is a voluntary system. Only those concession holders accepting to join the system are monitored under FORCOMS and have the results pertaining to the legal compliance and sustainability of their operations communicated.

2. The verification and auditing of information is conducted by an independent and accredited body.

3. A Steering Committee ensures the credibility and integrity of the application of the system.

4. Reporting is through a web site dedicated to markets and civil society, with hard copy reports provided to participating companies.

Some pertinent aspects of FORCOMS include:

- Monitoring is based on self-reporting and yearly audits by the project teams on progress toward the achievement of FORCOMS standards.

- FORCOMS will not issue certificates, but companies may employ an independent and accredited auditing firm that produces its own certificate complying with FORCOMS standards.

- Project audits are intended to be subsidized to ensure access to the system for smaller forest companies (third party audits will not be subsidized).

By providing reports on progress based on a set of indicators of legality and sustainability FORCOMS provides the basis for a stepwise approach toward sustainable forest management and certification.