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**Avoiding the Riptide:
Liberia must enforce its forest laws to prevent a new wave of illegal
and destructive logging contracts**

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Six months after announcing strong actions to tackle a dramatic breakdown in the rule of law in the logging industry, the government of Liberia has yet to deliver. This briefing presents evidence that suggests the government's failure to crack down on criminal activity in the forest sector is emboldening companies and individuals to continue flouting the law, with increasingly grave consequences for the country's rainforests and the communities that should be benefitting from them.

In December 2012, a Liberian government investigation reported systemic legal violations, including fraud and corruption, in the issuance of illegal logging licenses called Private Use Permits (PUPs), which cover a quarter of Liberia's surface area. The investigation report recommended that the government cancel PUP contracts and prosecute those guilty of violating laws. In response, President Ellen Johnson Sirleaf quickly issued an Executive Order placing a moratorium on logging by PUP holders and committing to prosecute and sanction those who broke the law. Government officials state that they are implementing the Executive Order, but so far no PUPs have been revoked and no criminal charges have been filed.

At the same time, it has been alleged to Global Witness that individuals involved in Liberia's wartime timber industry now occupy prominent positions in two major logging companies that also hold PUPs. This is a potential violation of Liberian laws intended to prevent those implicated in the trade in conflict timber from profiting from the sector.

The Liberian government's failure to enforce its forest laws is encouraging logging companies to look for new ways to get around them. Starting in August of 2012, the government has received 23 applications for Community Forest Management Agreements (CFMAs), contracts designed to ensure that communities properly govern and manage their forests. However, logging companies appear to be behind the new applications, with little or no involvement by local communities. This risks turning an instrument designed to empower communities into an exploitative mechanism by which logging companies illegally gain cheap access to forests.

The Liberian government has stated it is upholding a moratorium on new CFMAs and will not process applications, moves that Global Witness applauds. However, until the government enforces its forest laws and holds accountable those who have broken them, logging companies and individuals will have little incentive to follow the law and Liberia will not derive sustainable benefits from its forests.

1) Half Liberia's forests under illegal logging permits and no one held responsible

In 2012 Global Witness, Save My Future Foundation (SAMFU) and Sustainable Development Institute (SDI) reported that companies had illegally obtained a large number of logging licenses called Private Use Permits (PUPs).¹ Intended to allow private landowners to clear forest on their land, companies used PUPs to cut timber while avoiding the taxes and environmental standards applicable to other large logging contracts. Moreover, PUPs were issued in communities' names without their consent and some involved the use of fraudulent documentation, including forged signatures and deeds, to justify the permits.

Ultimately, 63 PUPs were issued, mostly in 2010-11, covering about 2.5 million hectares (ha) or 23 percent of Liberia's entire territory and roughly 40 percent of its forests.² The locations of these PUPs are shown on the map in the Annex to this brief.

Presented with the evidence of legal violations, in August 2012 President Johnson Sirleaf ordered a halt to PUP logging operations and exports and suspended staff at the Forestry Development Authority (FDA) and the Ministry of Land, Mines and Energy.³ The President also created a Special Independent Investigating Body (SIIB) to review the contracts and in December 2012 the SIIB published its report. The investigation concluded that all PUPs were awarded illegally.⁴ The SIIB report also catalogued specific instances of abuse, including suspicious payments to officials, the widespread use of forged documents and a network of linked companies that together had obtained PUPs covering 1.6 million ha of forest. This network, which includes Forest Ventures, Nature Oriented and Timber, Atlantic Resources and Southeastern Resources, is connected with notorious Malaysian logging giant Samling.⁵ According to the SIIB, responsibility for the PUP scandal lay with both government officials and companies:



Logs felled by Forest Ventures under an illegal Private Use Permit (PUP) stockpiled at the port of Buchanan in April 2013. The government has banned exports of PUP logs but has yet to cancel permits or prosecute those guilty of violating laws.

The regulatory agencies charged with protection of Liberia's natural resources were derelict in their duties and instituted a system that facilitated illegal activities and thus endangered reforms instituted to improve the viability of the sector. Together with logging companies, the FDA management team abused their power for the financial gains for companies and possibly themselves.⁶

To restore the rule of law in the forest sector, the SIIB report outlined a series of measures that should "be undertaken with all deliberate speed."⁷

- All PUPs should be cancelled.
- Government officials and companies should be criminally investigated for involvement in fraud, corruption and other legal violations relating to PUPs and sanctioned and prosecuted as appropriate where there is evidence of wrongdoing.
- Companies affiliated with logging company Atlantic Resources including Forest Ventures, Southeast Resources and Nature Oriented and Timber should be permanently barred from engaging in commercial forestry activities for forging documents and other fraudulent activities in violation of Liberian law.
- The government should undertake additional sanctions and measures to ensure PUPs cannot again be used illegally, including confiscating and auctioning timber felled in PUPs, reviewing the legitimacy of land deeds on which PUPs were based and developing regulations for the use of PUPs.

In the weeks following the publication of the SIIB report, President Ellen Johnson Sirleaf committed to most of the recommendations outlined in the report and issued Executive Order No. 44, which enshrined into law a moratorium on logging operations by PUP holders and ordered criminal investigations.⁸ The Executive Order, which Global Witness welcomed, suggested that the Liberian government was committed to implementing the recommendations of the SIIB report.⁹

However, six months later the Liberian government has yet to translate commitments on paper into concrete action. In May, the Ministry of Justice reviewed an initial ten PUPs and found them to be in gross

violation of Liberian law.¹⁰ The FDA Managing Director has stated that the FDA will begin a process of cancelling these permits and will review the remaining 53 PUPs.¹¹ While it has not yet brought any criminal prosecutions relating to PUPs, the government has informed Global Witness that it *“is in the process of concluding arrangements to prosecute those who need to be prosecuted.”*¹² However, until the government actually begins cancelling contracts and carrying out prosecutions, those responsible will have no reason to believe Liberia is serious about enforcing its laws.

2) Reported links between new companies and wartime loggers

The SIIB report details the systematic legal violations associated with the issuance of PUPs. Meanwhile, Global Witness has received reports of potential links between two companies holding PUPs, Forest Ventures and Mandra Forestry Liberia, and the wartime logging company Oriental Timber Company (OTC). Under Liberian law, companies with links to OTC may be barred from holding logging contracts.¹³



William Yii Hock Kong's Photos in Wood

Image of an OTC truck on the Facebook page of William Hock Kong Yii, who was reportedly a manager for OTC during Liberia's conflict and may now be employed by PUP-holding company Forest Ventures. Liberian law bars certain individuals implicated in Liberia's conflict timber trade from working in the forest sector. The government must enforce its laws to ensure wartime loggers do not again abuse Liberia's forests.

Liberia's civil war was fuelled, in part, by the international trade in timber. OTC was one of the most notorious companies operating at the time. The company controlled large swathes of Liberia's forests, facilitated numerous arms shipments in violation of a UN Security Council embargo and maintained security forces that fought alongside Charles Taylor's soldiers.¹⁴ Based upon these facts, the Liberian Truth and Reconciliation Commission concluded that the company *“aided or abetted civil instability”* during the country's war.¹⁵

As a result of the destructive role played by logging companies during the civil war, Liberia's reformed forest law bars companies from bidding on logging licenses if they have *“significant individuals”* who *“aided or abetted civil disturbances involving the use of weapons.”*¹⁶ Under the law, significant individuals are those who have real control over a company, including staff with corporate fiscal authority and members of a board of directors.¹⁷

It has been reported to Global Witness that both Forest Ventures and Mandra Forestry Liberia have significant individuals who were senior managers at OTC. Forest Ventures holds nine PUPs and is part of the network of Liberia-based logging companies linked to Samling.¹⁸ According to Forest Ventures' Business Registry documents, one William Hock Kong Yii is listed as *“empowered to bind”* the company.¹⁹ Based upon interviews commissioned by Global Witness, three individuals with knowledge of Forest Ventures and OTC operations independently identified one William Yii as a logging manager now operating in Liberia, although they did not identify his official corporate role within Forest Ventures. Those interviewed also identified Yii as a former senior manager with OTC.²⁰

Mandra Forestry holds two PUPs and is currently operating two additional Forest Management Contract (FMC) logging concessions.²¹ In its September 2010 Pre-Qualification Application, Mandra Forestry lists Tea Siu Sing as a shareholder and member of its Board of



A Mandra logging truck in Grand Bassa County in April 2013. One of Mandra's Directors, Tea Siu Sing, was reportedly a manager with the Oriental Timber Company (OTC), which trafficked arms during Liberia's conflict. If true, this could be a violation of Liberian laws designed to reform the forest sector.

Directors.²² According to seven independently interviewed individuals with knowledge of Mandra and OTC operations, a person named Tea Siu Sing was employed as a senior manager with OTC and is now working as a manager with Mandra Forestry, although those interviewed did not identify Sing as a member of Mandra's board of directors.²³

When asked about Sing's role within Mandra, a representative of the company confirmed that Sing was a member of Mandra's board. The company denied, however, that Sing had been employed by OTC and stated that he had not been in Liberia during the country's civil war.²⁴ Global Witness also wrote to Forest Ventures requesting information on Yii's employment history but as of the date of publication had not received a response from the company.

Global Witness does not have evidence that either Yii or Sing were directly involved in Liberia's civil war. However, both are reported to have served as senior managers with OTC, a company that itself was deeply complicit in financing and providing arms during Liberia's brutal war. The Liberian government should investigate the management of Forest Ventures and Mandra Forestry to determine the extent of the companies' links to OTC and whether relevant laws are being violated. If the Liberian government is to turn the page on its history of conflict timber it must start enforcing the law, barring those who operated during the civil war and any companies for whom they now work.

3) Feeling no fear: Companies attempt to hijack community forest licenses

Liberia is already facing the consequences of not enforcing its forest laws as companies are again breaking the law in the pursuit of new logging permits, this time using Community Forestry Management Agreements (CFMAs). CFMAs are designed to promote communities' rights. As with the PUPs, however, logging companies are applying for large numbers of CFMAs, often with little or no knowledge of local communities, violating the law and denying people the right to manage their forests.

CFMAs are, in principle, an important legal tool that allows communities to manage their forests. The 2009 Community Rights Law, which establishes CFMAs, is not without flaws but is intended to promote community forests that are well-planned and managed through accountable local governance structures. As such, for a CFMA to be legally approved certain steps must be followed.²⁵

- A CFMA must be applied for by a community.
- A community must establish forest governance structures with formal constitutions and by-laws.
- The government and a community must work together to survey and demarcate the forest.
- If a company wishes to log in a community forest it must enter into a contract with the community.

Over the past five years, international partners such as the U.S. government and Fauna and Flora International (FFI) have worked with certain communities around Liberia to establish CFMAs. These agreements have been developed in accordance with the Community Rights Law and show how the model could be adopted throughout the country. Five such CFMAs have been approved with support from USAID.

The CFMAs facilitated by USAID and FFI are sincere efforts to help communities manage their forests. However, logging companies have started submitting applications for CFMAs in large numbers. These applications suggest that logging companies are attempting to abuse CFMAs on a large scale, not to benefit communities but to illegally gain access to forests.

Global Witness has examined 32 recent CFMAs applications, along with an additional 10 CFMAs that have already been approved by the FDA and are discussed in more detail below. Four of the 32 applications have been facilitated by international partner FFI and thus appear to be legitimate efforts to support community forest management according to the requirements of the Community Rights Law. However, the evidence suggests that the remainder of the applications are driven by logging companies looking for new ways to obtain rights to log Liberia's forests:

- Since August 2012, when the government began enforcing a moratorium on logging and exports under PUPs, it has received 23 CFMA applications.
- 14 applications show the involvement of a logging company, either based upon documents submitted to the FDA or interviews conducted by Global Witness with people living in CFMA application areas.
- Five applications show evidence of individuals attempting to replace an existing PUP with a CFMA or explicitly obtain a CFMA in lieu of a PUP.
- Global Witness has copies of 25 CFMA applications, all of which are signed by one or more “community members.” However, Global Witness visited five communities in whose names CFMA applications had been submitted, and people interviewed in four of these communities stated that they were unaware applications had been submitted. In one community, people stated that they were aware of a CFMA application, but stated that it had been led by a logging company.
- Most of these CFMA applications do not include information on precise locations or sizes of community forests. However, those that do contain such information suggest that CFMAs would cover not less than 500,000 ha of Liberian territory. Those CFMA applications for which we have location information are represented on the map in the Annex.

As with PUPs, logging companies are thus attempting to use CFMAs to obtain large amounts of forest without the knowledge of the people living there. This is completely contrary to the purpose of CFMAs, which is to promote the rights of forest communities. Accordingly, under the Community Rights Law only a community can initiate the CFMA process: “*the establishment of a forest community shall be activated through the submission of a written request by the Community to the [FDA]*.”²⁶ The current wave of CFMA applications represents a new widespread threat to Liberia’s forests, and if approved they will violate the rights of communities living across the country and make a mockery of the country’s forest laws. As such, CFMA applications submitted by logging companies must be rejected by the Liberian government.

The Liberian government has recognized that CFMA applications may be subject to abuses similar to those involving PUPs. In February 2012, the government imposed a moratorium on the awarding of new CFMAs and PUPs.²⁷ The current FDA Managing Director has recently confirmed to Global Witness that the FDA does not intend to process CFMA applications while the moratorium remains in force and has committed to following the law if and when new allocations are made.

4) Slipped through the cracks: evidence that illegal CFMAs have already been approved

Prior to the 2012 moratorium, the FDA had approved ten CFMAs. Five of these were prepared with assistance from the USAID programs mentioned above and are significantly smaller in area than the five other approved CFMAs for which Global Witness was able to obtain data. Of the five large approved CFMAs, four show clear evidence of logging company involvement. These CFMAs were allocated at the same time that the government was issuing PUPs, are notably similar in size to PUPs, and are located in proximity to other large logging concessions. Locations and sizes for four of the five USAID-assisted CFMAs and the five larger CFMAs are shown on the map in the Annex to this brief.

Global Witness interviewed community members living in two of the approved company-led CFMAs and found evidence that the requirements of the Community Rights Law were not applied:

- The Blouquia CFMA in Grand Gedah County is associated with a company called A. & M. Enterprises, headed by Aicha Konneh. Konneh is a self-proclaimed “*founder and main leader*” of the rebel group Liberians United for Reconciliation and Democracy (LURD), a wartime rebel group known to have committed atrocities against civilian groups.²⁸ One community member involved in the approval of the Blouquia CFMA stated that he was told to sign documents he did not understand and only later realized they did not commit the company to provide the expected benefits.²⁹ Global Witness wrote to Konneh regarding her relationship with LURD and process by which A. & M. became associated with the Blouquia CFMA, but by the date of publication had not received a response.

- In the Doru CFMA (Nimba County), community members reported that they had been solicited by Liberia Tree & Trading Co. (LTTC) for a CFMA and were rushed into signing documents to legitimize the deal. At a meeting attended by Global Witness and at least 50 Doru residents, community members reported that they had not been given copies of the actual CFMA contract and there was confusion over what promises the company had made in exchange for the right to log the forest.³⁰ As early as 2009 and possibly as late as March 2012 LTTC was headed by Ricks Toweh.³¹ Starting April 2012, control of the company appears to have been transferred to his wife.³² However, in January 2012 Ricks Toweh was elected to the Liberian legislature and Liberian law bars both legislators and their relatives from holding logging concessions.³³ Global Witness wrote to Toweh regarding his involvement and that of his wife with LTTC and the process by which LTTC became associated with the Doru CFMA. By the date of publication no response had been received.



Ricks Toweh was elected to the legislature in January 2012. Toweh and his wife have headed the LTTC logging company, which aims to log under a CFMA. Liberian law forbids legislators from holding logging contracts.

These testimonies raise questions about whether the Blouquira and Doru CFMAs followed the governance and planning requirements laid out by the Community Rights Law and therefore whether the agreements are valid. The Liberian government should investigate the process by which these and other approved CFMAs were developed and awarded where there is evidence that the process was driven by logging companies and not communities. It should also investigate whether the individuals in charge of the companies pursuing logging contracts have the legal right to engage in the forest sector. Moreover, when the government approves future CFMAs it must ensure that these agreements are not simply industrial logging contracts by another name but genuine efforts by communities to manage their forests.

Conclusion and Recommendations

As emphasized by the Special Independent Investigating Body, if Liberia's forest sector is to function, the Liberian government must hold individuals and companies to account where there have been violations of the law. Executive Order No. 44 indicated a strong commitment by President Johnson Sirleaf to bring order to the sector following the explosion of PUPs. It is essential that the government fully implement its Executive Order and the full set of recommendations from the SIIB's report. Failure to do so would perpetuate the climate of impunity that currently characterizes Liberia's forest sector and further embolden companies and individuals to flout laws in pursuit of quick profits at the expense of Liberia's forests and communities.

In order to restore the rule of law in the forest sector, the Liberian government should:

- Immediately cancel all Private Use Permits.
- Immediately prosecute government officials, companies, and individuals where there is evidence of legal violations during the award or operation of PUPs.
- Investigate the management structure of Mandra Forestry and Forest Ventures (and its affiliates) to determine whether the companies have significant individuals who worked with Oriental Timber Company. If either investigation finds that the companies acted illegally, sanction the companies to the full extent of the law.
- In accordance with Reg 103-07, sec. 21, establish a list of individuals and companies that are barred from operating in Liberia's forest sector due to links to the wartime conflict timber trade and make the list publically available.

- Implement the recommendation of the Special Independent Investigating Body that specific companies should be barred from operating in Liberia, including Atlantic Resources, Forest Ventures, Southeastern Resources and Nature Oriented and Timber.
- Investigate the following existing CFMAs to determine whether they have been approved in accordance with Liberian law: Bluyema Clan; Blouquia Clan; Doru Chiefdom; Gbi Chiefdom; Neezonnie-Gbao Clan.
- Publish the criteria by which applications for Community Forest Management Agreements will be evaluated and approved in accordance with Liberian law.
- Work with international donor partners to develop CFMAs that follow Liberian law to ensure appropriate governance and management of resources by communities living in the forests.

¹ Global Witness, Save My Future Foundation, Sustainable Development Institute, Signing their Lives away: Liberia's Private Use Permits and the Destruction of Community-Owned Rainforest, September 2012.

² Government of Liberia, Special Investigating Body Report on the Issuance of Private Use Permits, 19 December 2012, p. 57-65. Affected forests including "closed dense" and "open dense" forests and are determined by calculating geometry of PUP contracts relative to forest data drawn from Bayol, Nicholas; Chevalier, Jean-Francis, Current State of the Forest Cover in Liberia, July 2004.

³ Government of Liberia, Gov't Frowns on Fake PUP Holders, 20 August 2012.

⁴ Government of Liberia, Special Investigating Body Report on the Issuance of Private Use Permits, 19 December 2012, p. ix.

⁵ Evidence outlined in the SIIB Report demonstrates the close corporate ties between Atlantic Resources Ltd., Forest Ventures Inc., Southeastern Resources Inc. and Nature Oriented and Timber Corp. Government of Liberia, Special Investigating Body Report on the Issuance of Private Use Permits, 19 December 2012, p. 13, 19, 26-27, 33-35, 44-45, 57-59. For a discussion of the relationship between Atlantic Resources, Southeastern Resources and Alpha Logging & Wood Processing Inc., see Global Witness, Memorandum on the due diligence report on companies bidding for Forest Management Contracts, 15 July 2009.

⁶ Government of Liberia, Special Investigating Body Report on the Issuance of Private Use Permits, 19 December 2012, p. 41.

⁷ Government of Liberia, Special Investigating Body Report on the Issuance of Private Use Permits, 19 December 2012, p. viii, ix-xi, 11.

⁸ Government of Liberia, President Sirleaf Begins Taking Action on PUP Abuse, 31 December 2012; Government of Liberia, Pres. Sirleaf Vows to Implement PUP Probe, 3 January 2013; Government of Liberia, Executive Order No. 44, 4 January 2013. The section of Executive Order No. 44 extending the moratorium on operations to non-PUP concessions is not currently enforced, reportedly because it was overturned by the Liberian Supreme Court in February of this year. Copies of this Supreme Court ruling or the Executive's interpretation of it have not been made publicly available.

⁹ Global Witness, Global Witness welcomes Liberian President's strong action to tackle illegal logging and urges government to sanction companies and officials responsible, 11 January 2013.

¹⁰ Dept. Minister of Justice Benedict Sannoh, Letter to FDA Managing Director Harrison Karnwea, 15 May 2013.

¹¹ Dept. Minister of Justice Benedict Sannoh, Letter to FDA Managing Director Harrison Karnwea, 15 May 2013.

¹² FDA Managing Director Harrison Karnwea, Email to Global Witness, 28 May 2013.

¹³ Forestry Development Authority, Regulation 103-07, sec. 1, 22, 23.

¹⁴ Republic of Liberia Truth and Reconciliation Commission, Final Report Vol II, July 2009, p. 335-9; Report of the Panel of Experts appointed pursuant to Security Council Resolution 1306 (2000), paragraph 19, in relation to Sierra Leone, December 2000; Global Witness, Taylor Made, September 2001; United Nations Security Council, Resolution 1478 (2003), 6 May 2003.

¹⁵ Republic of Liberia Truth and Reconciliation Commission, Final Report Vol II, July 2009, p. 339.

¹⁶ Forestry Development Authority, Regulation 103-07, sec. 22, 23.

¹⁷ Forestry Development Authority, Regulation 103-07, sec. 1.

¹⁸ Government of Liberia, Special Investigating Body Report on the Issuance of Private Use Permits, 19 December 2012, p. 44-45, 57-59.

¹⁹ Liberian Business Registry, Enterprise application form for registration (RF-001): Forest Venture Inc., 16 May 2011.

²⁰ Interviews with individuals knowledgeable of OTC operations, May 2013.

²¹ Government of Liberia, Special Investigating Body Report on the Issuance of Private Use Permits, 19 December 2012, p. 57-59; Global Witness interviews with experts familiar with Liberian logging industry, April 2013.

²² Mandra Forestry Liberia Ltd, Pre-Qualification Application, 16 September 2010.

²³ Interviews with individuals knowledgeable of OTC operations, May 2013.

²⁴ Xilang, Zhang, Mandra Forestry, Email to Global Witness, 29 May 2013.

²⁵ Community Rights Law of 2009 with Respect to Forest Lands, 2009, ch. 6; Forestry Development Authority, Regulations of the Community Rights Law of 2009 with Respect to Forest Lands, 2011, ch. 2(2), (6)-(10), (14), 3, 7(2).

²⁶ Forestry Development Authority, Regulations of the Community Rights Law of 2009 with Respect to Forest Lands, 2011, ch. 2(2).

²⁷ FDA Board of Advisors, Investigation Report, February 2012.

²⁸ Articles of Incorporation, A. & M. Enterprises, Inc., 7 March 2011; IRIN, Conneh's estranged wife emerges as power broker in LURD, 14 January 2004; United Nations Panel of Experts on Liberia, Report of the Panel of Experts submitted pursuant to paragraph 4 (d) of Security Council resolution 1731 (2006) concerning Liberia, 7 June 2007, p. 34; Republic of Liberia Truth and Reconciliation Commission, Final Report Vol II, July 2009, p. 186-88.

²⁹ Global Witness interview, April 2013.

³⁰ Global Witness interview, April 2013.

³¹ Government of Liberia, Forest Management contract Area 'C,' 27 May 2009; Toweh, Ricks, LTTC-Mandra, Letter to FDA Managing Director Moses Wogbeh, 17 May 2011; Liberian Business Registry, List of individuals associated with registered companies, 9 March 2012.

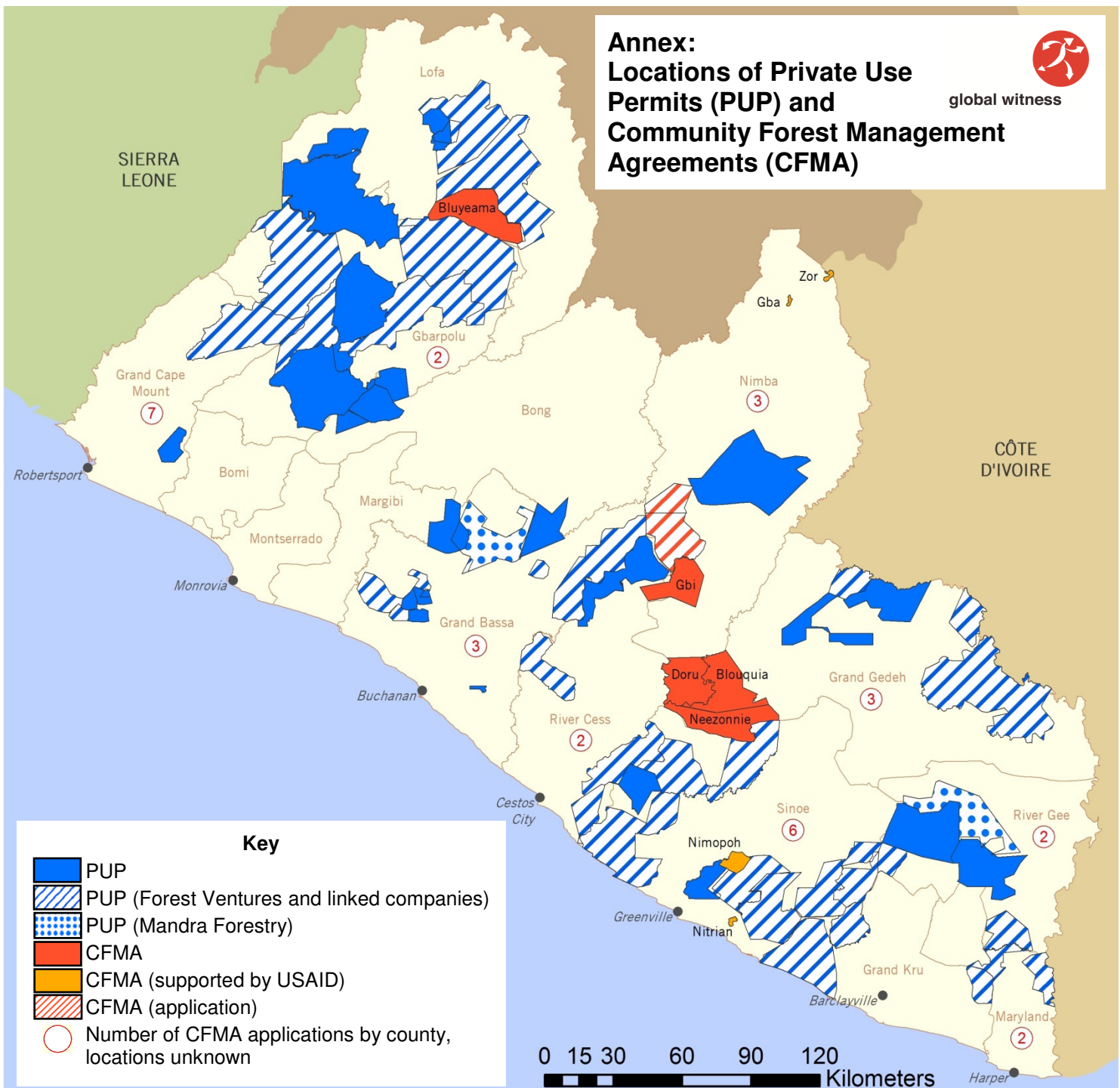
³² Toweh, Nyunyun, LTTC, Letter to GT Bank Management, 17 April 2012.

³³ National Elections Commission, Nimba: Elections Results 2011, 15 November 2011; Government of Liberia, National Forestry Reform Law of 2006, September 2006, sec. 5.2(b)-(c).

Annex: Locations of Private Use Permits (PUP) and Community Forest Management Agreements (CFMA)



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Areas Affected by Forest Contracts

Contract	Area (ha)	Forest (ha) ¹
PUPs	2,532,501	1,419,106
Approved CFMAs	~223,003	>145,791 ²
CFMA applications	>506,181	>9,409
Forest Management + Timber Sale Contracts ³	1,057,459	901,569
Total	> 4,319,144	> 2,475,875

Contracts Represented on the Map

Contract ⁴	On Map	Not on Map
PUPs	59	4 ⁵
Approved CFMAs	9	1 ⁶
CFMA applications	2	30 ⁷

Notes

The above map shows the 59 PUPs, 9 approved CFMAs and 2 CFMA applications for which information is available. Together, PUPs and approved CFMAs cover 46 percent of Liberia's "closed dense" and "open dense" forests. The charts to the left show the total area of Liberia and total area of forests covered by major forest contracts and summarize those contracts for which detailed location information is available.

A Liberian government investigation has found that all PUPs were awarded illegally and should be cancelled, while the Ministry of Justice has stated that cancellation proceedings should begin for 10 PUPs found to be in gross violation of Liberian law. However, to date no PUPs have been cancelled. Five approved CFMAs and four CFMA applications have been facilitated by international partners and are legal, legitimate efforts at promoting community forestry. However Global Witness has collected evidence demonstrating that four approved CFMAs and many CFMA applications have been submitted by logging companies, not communities, a violation of Liberian law.

(1) Forests affected include "closed dense" and "open dense" forests. Affected areas determined by calculating geometry of contracts relative to forest data from Bayol, et. al, Current State of the Forest Cover in Liberia, July 2004.

(2) Calculation does not include forests affected by 5 approved small CFMAs supported by USAID that together cover approximately 19,993 ha.

(3) For clarity's sake, 7 Forest Management Contracts and 10 Timber Sale Contracts not shown on map.

(4) PUP, CFMA and FMC locations drawn from contract maps.

(5) PUPs not on map from Special Independent Investigating Body Report, 19 December 2012.

(6) According to the Liberian government one additional CFMA, assisted by a USAID program, has been approved in Nimba County.

(7) CFMA applications not on map from documents provided by the government.