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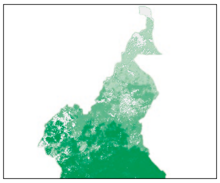
CAMEROON



Jake Brunner
François Ekoko

In 1989, the World Bank initiated a major attempt to improve forest management in Cameroon by tying forest policy reforms to structural adjustment lending. The first round of negotiations between the World Bank and the Government of Cameroon culminated in the 1994 Forest Law, which introduced far reaching changes in the way that forest concessions were allocated, taxed, and managed. The law also included provisions that, for the first time in Central Africa, granted local communities the right to benefit financially from wood cut in their customary forests. Yet, despite the World Bank's substantial efforts, the government repeatedly reneged on its commitments, throwing the implementation of the reforms into disarray.

The policy reform process in Cameroon is of national and regional significance. Understanding the process, however, is complex. Stakeholders in the reform process—the various branches of government, the private sector, the World Bank, other international donors, domestic and international NGOs, and local communities—tend to hold divergent views about the reforms' success. Arriving at a balanced assessment of the World Bank's approach means calibrating among a range of conflicting opinions.[1]

BACKGROUND

From independence in 1960, Ahmadou Ahidjo ruled Cameroon under a highly centralized, one-party system. Following his resignation on health grounds in 1982, he was replaced by Paul Biya, who continued one-party rule until 1990, when he was led by popular protest and external pressure to accede to a multi-party system. The parliamentary elections in 1992 left the president's party in power, but only as part of a coalition. The presidential election in the same year, which returned Biya to power, is generally considered to have been grossly manipulated, as was the second presidential election in 1997 (Burnham and Sharpe, 1997). According to Berlin-based Transparency International's Corruption Perceptions Index, Cameroon was the world's most corrupt country in 1998 and 1999 (Transparency International, 1999).

During the 1960s and 1970s, Cameroon enjoyed a reputation as one of the more successful economies in Africa (Burnham and Sharpe, 1997). Growth over this period averaged five percent a year, driven largely by high prices for its principal exports, including cocoa, coffee, cotton, aluminum, and from the late 1970s, petroleum. But imprudent use of its oil revenues, a 65-percent decline in the terms of trade for its chief export crops, and a marked expansion in government employment led to a balance of payments crisis in the early 1980s; the inauguration of an IMF structural adjustment program in 1988; and a 50-percent currency devaluation in 1994. Gross domestic product (GDP) declined by six percent per annum on average between 1986 and 1993, producing a 50-percent fall in per capita incomes. Economic decline was accompanied by increased poverty, as poor farmers suffered the brunt of the fall in producer prices and the government cut basic health and education services (World Bank, 1996). Public debt increased from US$5.9 billion in 1989 to US$9.1 billion in 1999, of which 80 percent was external debt. The ratio of external debt to GDP rose from 33 percent in 1989 to an all-time high of 109 percent in 1994, before falling back to 80 percent in 1999. Forty-four percent of the budget goes for debt service.

The World Bank has been closely associated with Cameroon's development efforts since 1967. As Table 3.1 shows, there has been a significant shift away from project lending—which fell from US$902 million in 1980–1991 to US$154 million in 1992–1998 —toward structural and sectoral adjustment lending, which increased from US$150 million to US$612 million over the same period. Project lending has thus declined in both relative and absolute terms. The earlier generation of projects was plagued with problems, and following a portfolio review in late 1993, eight were closed and three restructured (World Bank, 1996). A US$273 million cocoa rehabilitation project had had no result whatsoever according to the World Bank's own Operations Evaluation Department.

The World Bank would like to do more work in Cameroon, but it has not disbursed project funds because of the poor management and problems linked to a lack of transparency and good governance in that country (Reuters, 1999). By the end of 1999, the World Bank had only six projects in Cameroon worth US$330 million, compared to 34 projects in Ghana worth US$1.2 billion, and 23 in Ivory Coast worth US$578 million.

TABLE 3.1 | WORLD BANK LENDING TO CAMEROON (IN TOTAL COMMITMENTS US$ MILLION), 1980–1998

	1980–1991		1992–1998	
Structural adjustment lending	Projects: 1	Loan: 150	Projects: 7	Loan: 432
Sectoral adjustment lending	Projects: 0	Loan: 0	Projects: 2	Loan: 180
Project lending	Projects: 25	Loan: 902	Projects: 6	Loan: 154
Forest projects	Projects: 1	Loan: 17	Projects: 0	Loan: 0
Nonforest projects with forest components	Projects: 1	Loan: 22	Projects: 0	Loan: 0

Source: World Bank, 1998

BOX 3.1

CHRONOLOGY OF ADJUSTMENT AND FOREST POLICY REFORM IN CAMEROON

- 1986 — Onset of the economic crisis.
- 1988 — TFAP completed and SAC I approved.
- 1992 — Paul Biya wins the presidential elections.
- November 1993 — National Assembly debates the draft Forest Law.
- January 1994 — Devaluation of the CFA franc and approval of the ERC.
- August 1995 — Promulgation of the Implementation Decree.
- February 1996 — SAC II approved.
- August 1997 — First concession auction.
- October 1997 — Paul Biya wins the presidential elections.
- June 1998 — SAC III approved.
- June 1999 — Government approves new concession auction rules.

The World Bank has been involved in three Structural Adjustment Credits (SACs) in 1988, 1996, and 1998, and an Emergency Recovery Credit (ERC) following the currency devaluation in 1994. Only SAC III included detailed forest conditionalities, although SAC I and the ERC were used to ensure that the government passed the major legal texts necessary for forest sector reform. Boxes 3.1 and 3.2 summarize, respectively, the chronology of the reform process and the main forest conditionalities.

ADJUSTMENT LENDING AND FOREST POLICY REFORM

The forest sector contributes significantly to Cameroon's economy. Timber production increased rapidly after 1992 as a result of the economic crisis, the currency devaluation, and a surge in demand for logs from Asia. In 1998, the sector contributed ten percent of non-oil GDP, nine percent of all tax revenues (if transport and related activities are included), and 28 percent of all exports by value. Sixty-six sawmills were active in 1999, producing a total of 2.7 million m^3 of wood and directly employing 10,400 people (MINEF, 1999).

Starting in 1989, the government, with strong World Bank support, targeted policy reform as the cornerstone of improved forest management. Cameroon's forests were declining in both size and quality. Clearing for agriculture was identified as the major

BOX 3.2 | **FOREST CONDITIONALITIES**

1988 SAC I: preparation of the Forest Law.

1994 ERC: promulgation of the Implementation Decree.

1998 SAC III: definition of detailed concession auction criteria and appointment of an independent observer to report on the auction proceedings; preparation of a strategy for the allocation of logging concessions; preference given to community forests over *ventes de coupe* in the non-permanent forest zone; and implementation of an effective tax recovery program.

cause of deforestation, but logging, and the commercial poaching that goes with it, was considered to be the main cause of forest degradation (O'Halloran and Ferrer, 1997). The World Bank believed that if it changed the way that logging concessions were allocated, taxed, and managed, the government could prevent the worst environmental damage and increase its share of revenue to help deal with its most pressing economic and social concerns. The World Bank intended follow-up these reforms with a forest loan that would allow it to monitor policy implementation.

The regime had used the allocation of logging concessions to maintain political support, as shown by the jump in the number of registered logging companies prior to the presidential elections in 1992 and 1997. Strong vested interests were opposed to changes that would have limited the use of Cameroon's forests for political purposes. The World Bank tried to overcome these interests by tying reforms to structural adjustment lending, a powerful incentive.

The 1994 Forest Law

A detailed review of Cameroon's 1981 Forest Law had been undertaken by the 1988 Tropical Forestry Action Plan (TFAP). Between 1989 and 1993, the World Bank undertook a series of missions to Cameroon to discuss a forest and environment project that would help implement the TFAP recommendations. Gradually, however, the discussion shifted away from project activities and toward Cameroon's forest policies and the need to update the previous law. Although the Food and Agriculture Organization and the United Nations Development Programme led the TFAP preparation, it was the World Bank that pressed the government for policy reform since these agencies and the bilateral donors had neither the political will nor financial leverage to do so. While the World Bank's forest and environment project team negotiated with the government, a second team, based in Washington, started work on a new forest law. In 1993, the World Bank stated its opinion that significant reforms were needed before further project support could be justified (Ekoko, 1997).

One of the main weaknesses of the 1981 Forest Law was the lack of a legal framework for planning land use and integrating forest protection and production activities (O'Halloran and Ferrer, 1997). Under the previous system, the Prime Minister had sole discretion over the allocation of logging concessions, while the Minister of Agriculture, and later the Minister of Environment and Forests,[2] was responsible for granting smaller (2,500 ha) cutting rights (*ventes de coupe*). Larger concessions (*licenses*) were given for a period of five years (but were renewable) on the basis of requests submitted by logging companies. The *ventes de coupe* and *licenses*, which had no management requirements, were allocated based on mutual agreement between the companies and government authorities. Companies had no incentive to manage the forests efficiently because they were unlikely to derive any benefit from good management. The law did not allow the transfer of concessions, and did not guarantee long-term access so that companies could benefit from previous practice during a second felling cycle. Since export taxes were not linked to the market price of wood, and area taxes were very low, loggers were encouraged to cut only the best trees and the government received less revenue. Companies constructed roads deep into the forest to exploit the rarest and most valuable timber species, opening up these areas to agricultural settlers and bushmeat hunters.

The lack of a clearly defined forest policy hindered the drafting of the new law. The Ministry of Agriculture commissioned a set of studies of forest concessions and taxation. These studies, which were proposed by the World Bank and largely funded by Canadian development assistance, were completed in 1992.[3] In November 1993, the World Bank and the Ministry of Environment and Forests (MINEF) agreed on the draft text of the Forest Law, which was submitted to the National Assembly.

The draft law introduced four basic reforms (O'Halloran and Ferrer, 1997). First, concessions were to be allocated by auctions on the grounds that they are less susceptible to political pressure and more economically efficient than the previous discretionary practices. Second, the law introduced changes in pricing and taxation to allow for an increase in fiscal revenue and the use of market-based incentives to improve forest management (Karsenty, 1999a). A key reform was a significantly higher area tax indexed to inflation.[4] The World Bank argued that by increasing the cost of the raw material, a higher area tax encourages greater efficiency in its use, and that a company with large margins to improve efficiency is more likely to invest in reducing waste than in acquiring larger concessions. In 1997, the World Bank also succeeded in having market prices introduced as the basis of export tax rates, which the government had rendered meaningless by manipulating the reference prices through obscure administrative decisions. These prices underestimated the value of logs by 30–40 percent and of processed wood by 90 percent, and represented a significant loss in government revenue.

Third, the draft law introduced forest management plans.[5] Whereas auctions and higher area taxes were believed to constitute sound forest policy (Grut et al., 1991), there was little empirical evidence of their impact on harvesting practices, which some feared would intensify. Forest management plans were intended to mitigate the potential negative effects of more intensive logging. They also responded to growing domestic and international support for sustainable forest management. Finally, the draft law included provisions for local communities to acquire the exclusive right to manage and exploit up to 5,000 ha of their customary forest. Local communities could earn revenue by logging their forests themselves or contracting with a logging company. They were also to receive 10 percent of the area tax, with 40 percent going to the communes, the lowest level of government administration, and 50 percent to MINEF.

Lack of Borrower Ownership

The process by which the 1994 Forest Law was drafted reflects the central role played by the World Bank and the passivity of the Government of Cameroon. Letters from the World Bank to the government between 1990 and 1992 show that the World Bank was instrumental in shaping the reform agenda (Ekoko, 1997) and maintaining the momentum of the policy dialogue. Because of poor interministerial coordination and MINEF's internal weaknesses, the government not only failed to lead the reform process, but also to participate in it effectively.

Authority over the negotiations was widely dispersed. By 1992, nine different governmental agencies had some input into, or degree of oversight over, forest policy.[6] MINEF's authority relative to the other agencies was undermined by the lack of political clout of the then Minister, who belonged to the smallest party in the governing coalition. Moreover, the establishment of MINEF in 1992 was not followed, as is normal practice, by the creation of a complementary desk in the Presidency to coordinate the activities of the Ministry with other government agencies. Although officially responsible for coordinating the policy dialogue, the President's advisors never met with MINEF staff to discuss the proposed law, nor did they consult with the President's party to assess the political implications of the new law (Ekoko, 1997).

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The lack of presidential leadership was compounded by MINEF's own weaknesses. In 1986, the President staked his prestige on his rejection of the tough austerity measures requested by the IMF, insisting that Cameroon would undertake economic reforms of its own. Budget cuts and the first of several hiring freezes were announced, but were never implemented. The crisis worsened with expenditure overruns in 1987 of 11.5 percent of GNP, and the government was forced to agree to IMF conditions that included severe reductions in administrative expenditures. Staff salaries were cut by 40 percent (and were often paid several months in arrears), virtually all perquisites (such as housing and vehicle allowance) were abolished, and the operating budgets of most ministries were slashed. In 1992, only five percent of MINEF's total budget was allocated to non-staff expenditures, and the last time the Ministry received new vehicles was in 1984. Maintenance, never adequately budgeted for, all but disappeared.

The IMF-led budget cuts were not compensated by effective donor support. A review of donor projects shows a strong orientation toward protected areas management and research (CIRAD, 1997). These tended to be of high symbolic value, but of limited practical use in strengthening the Ministry's analytical and coordination skills. Significantly, there had been little donor support for plantations, which require long-term investment and high quality management. The effect was to disperse the Ministry's resources on numerous small projects of limited potential. As one Ministry staff person put it: "On Monday we do biodiversity, on Tuesday forest taxation, on Wednesday protected areas . . ."[7]

Declining salaries, poor working conditions, and the offer of very large sums of money provided a strong incentive for corruption. The average MINEF official earned 60,000 CFA francs per month and had no means of transport or communication, but could gain millions of CFA by not reporting logging in areas for which a company had no right. According to World Bank staff, when the Ministry's computerized tax assessment system broke down in 1991, forcing the government to rely on logging company declarations, tax revenues went up, implying that the Ministry's tax reporting was even less reliable than the industry's.[8]

The collapse in MINEF's operational capacity, and the fact that many senior ministry officials benefited from the discretionary practices that the World Bank sought to end, undermined its interest in seriously engaging in the forest policy dialogue. Some ministry officials have also expressed personal hostility toward certain World Bank staff who they claimed imposed unreasonable deadlines backed up with the threat of loan suspension (Ekoko, 1997).

Modifications to the Law: the Role of the National Assembly and France

Since the late 1960s, Cameroon's National Assembly had confined itself to rubber-stamping the President's legislation. But with the return of multi-party politics and the weak performance of the President's party in the 1992 parliamentary elections, the Assembly started to play a more independent role. Fear of jeopardizing World Bank support led the Presidency to get the forest law passed by pressuring parliamentarians to abide by party discipline, and by leaving as little time as possible for debate (Ekoko, 1997).

Despite these tactics, the Assembly modified the text of the law and effectively changed key provisions. The most important change rejected the use of auctions to allocate logging concessions in favor of a clause that read: "a forest concession shall be granted upon recommendation by a competent commission." Parliamentarians who opposed the government on this issue argued that nationals would be unable to compete with foreign logging companies in an auction, and that the forest would be sold out to foreigners.

According to the World Bank, this fear was unjustified as the draft law included a concession size category of up to 50,000 ha that was open only to Cameroonian nationals. Thus, despite the patriotic rhetoric, partisan political gains and financial self-interest appear to have motivated the opposition (Ekoko, 1997). Many parliamentarians were involved in logging, either directly, or indirectly as shareholders in logging companies or as owners of licenses leased to foreign companies. They also benefited from the discretionary allocation of *ventes de coupe,* which allowed them to participate in the lucrative business with limited capital. These forests were typically subcontracted to foreign companies (a practice known derogatorily as *fermage*). Auctions implied an increase in the cost of access to the forest, and thus a threat to parliamentarians' financial interests. They would also have eliminated an important source of patronage.

Parliamentarians also sought to capitalize on the law's unpopularity to boost their fortunes in the municipal elections scheduled for June 1994 (Ekoko, 1997). The new law was very controversial and many opposed it, because they felt it legalized the plundering of Cameroon's forests. Parliamentarians from forest regions were particularly active during the discussions and, despite representing rival political parties, were united in their opposition. Prior to the debate, many rural youth considered their representatives as traitors for allowing their forest resources to be exploited without any financial compensation. Opposition to the law allowed parliamentarians to regain support from this constituency.

In addition to challenging the auction provision, parliamentarians also proposed banning log exports as a way of promoting local processing, limiting the maximum size of concessions from 500,000 ha to 200,000 ha, and reducing the maximum duration of concessions to 15 years (renewable for another 15). These decisions contradicted the advice of both the French government, which argued that larger and longer concessions were needed for sustainable forest management (Carret, 1998), and the World Bank, which argued that log export bans encouraged the rapid establishment of inefficient processing industries by depressing the local price of wood.

The proposed log export ban threatened French logging interests and allegedly triggered the intervention of the French government (Pearce, 1994). In November 1993, when the new forest law was being debated, the French Minister for Cooperation and Overseas Development, who happened to be in Cameroon at the time, met the President and Speaker of the National Assembly to discuss economic cooperation issues. There are indications, however, that the visit was also to lobby against a log export ban, which would have hurt the largest French companies, which accounted for over half of Cameroon's log exports. This visit could be interpreted as a reminder of the political and financial support that France has provided to the regime at crucial moments, and that France expected to receive similar support when its own interests were threatened. Significantly, the French Minister refused to meet with the main opposition leader, a move the President greatly appreciated.

This interpretation squares with the fact that the only time the Presidency intervened in the National Assembly was on the matter of the log export ban (Ekoko, 1997). Members of the President's party and other coalition members were ordered to vote against the ban. The approved version of the law states: "70 percent of logs shall be processed domestically." Immediately after the law was passed, the Presidency agreed that a ban would come into effect, but not until January 1999, five years later. Even the 70 percent rule was watered down by the provision that companies exporting more than

30 percent of their production as logs could do so if they paid a progressive surtax on the difference. This tax proved to be difficult to administer because of problems calculating logged and processed wood volumes.

According to the World Bank, its resident mission launched a publicity campaign to explain the economic benefits of the new law. In 1993, the World Bank hired the advisor to the Minister of Environment and Forests as its agriculture and natural resource officer. She brought an excellent knowledge of the forest sector and an extensive network of contacts inside and outside of government. The World Bank's resident representative also regularly appeared on television and radio to argue that the greater transparency the new law would bring was in the interests of the country. Nevertheless, the World Bank was powerless against the Assembly's opposition. Even the World Bank's special briefings proved counterproductive as parliamentarians accused it of meddling in Cameroon's internal affairs. The World Bank admits that its publicity campaign was ineffective, but when a staff member was asked what more it could have done, the reply was "Nothing short of overthrowing the government."[9]

Around the Parliamentary Roadblock: The Implementation Decree

The National Assembly's amendments to the draft law were inconsistent with what the World Bank considered to be a sound forest policy. At the same time, the government was negotiating an ERC following the CFA franc devaluation. The World Bank told the government that it would not accept the revised law. In response, the government sent a letter to the World Bank indicating that it would submit revisions to the law to the parliamentary session of November 1994. But during a visit to Cameroon, World Bank staff realized that the President would not dare challenge the Assembly on the new law.

The World Bank admits that its publicity campaign was ineffective, but when a staff member was asked what more it could have done, the reply was "Nothing short of overthrowing the government."

Two reasons explained the President's reluctance. First, the President's party was part of a fragile coalition that was struggling in the face of growing political opposition. This opposition had culminated in the villes mortes campaign that closed down many cities between 1990 and 1992 and threatened the very survival of the regime. Then, in 1992, Biya's victory in the presidential elections was seriously questioned, both domestically and abroad. The Presidency did not want to further provoke the opposition by reintroducing such controversial legislation. Second, the Presidency may have been pleased with the changes, because they allowed the continuation of the discretionary practices that served the interests of some powerful individuals, government officials, and many parliamentarians.

The World Bank realized that any effort to persuade the government to challenge the Assembly and reverse the most serious changes in the law would be futile. It therefore asked MINEF to draft an Implementation Decree that would interpret the law in line with the draft that the World Bank had originally agreed to. The Ministry submitted a draft version of the decree to the World Bank in July 1994. The World Bank rejected this version and several staff spent over a year revising the decree line by line. A final version, acceptable to the World Bank, was issued in August 1995. Changes in pricing and taxation were to be addressed in subsequent finance laws.

IMPLEMENTATION EXPERIENCE

Implementation of the 1994 Forest Law has been problematic. On the face of it, the forest and finance laws have succeeded in boosting tax revenues. After accounting for the effect of the 1994 devaluation, revenues went from 10 billion CFA francs in 1990, to 14 billion in 1994, to 24 billion in 1997 (Carret, 1998). Over the same period, wood production rose from about two to three million m^3. The government therefore increased its share of the value of the wood from 6,000 CFA/m^3 to 10,000 CFA/m^3. This increase was partly from higher area taxes and the use of market prices to determine export tax rates. But it mainly resulted from the Ministry of Economy and Finance (MINEFI) deciding to invite the Swiss company SGS in 1995 to control log exports, which accounted for 80 percent of forest taxes. This was done because of MINEF's poor tax recovery record. Implementation of other aspects of the new law has proved equally difficult, notably in the case of the concession auctions.

Concession Auctions

Allocating concessions by public auction was critical to maintaining the government's commitment to the reforms (O'Halloran and Ferrer, 1997). The World Bank was therefore concerned in May 1996 when the government granted concessions without auction to two French logging companies. The World Bank sent a letter to the President recommending that the two concessions be revoked. The World Bank never received a reply and the concessions were not canceled. In fact, a third concession was handed out covertly, this time in an area zoned for conservation. When the World Bank protested, the concession was canceled—a decision prompted by an upcoming donor meeting to discuss projects identified in the National Environmental Action Plan (Ekoko, 1997).

In May 1996, 112 *ventes de coupe* were put up for auction for which the applicants presented bids with an annual area tax of 1,000–3,000 CFA/ha. This demonstrated that a concession auction could work in Cameroon and that logging companies were willing to pay an area tax much higher than the 300 CFA in effect at the time of the law. The willingness of companies to bid so much for the *ventes de coupe* was one of the main reasons why the World Bank recommended raising the minimum area tax for the large concessions from 300 to 2,000 CFA/ha. However, the government did not amend the 1996–97 Finance Law and drew up concession application documents using an area tax of 300 CFA/ha. After subsequent negotiations with the World Bank, the government increased the tax to 2,000 CFA/ha through administrative procedures. But the industry argued that such a method was illegal and boycotted the auction, which was held in February 1997. The government received only five bids for the 42 concessions and the auction was aborted.

In August 1997, the government rebid 26 concessions with a minimum area tax of 1,500 CFA/ha, for which 190 companies submitted bids. The results showed that applicants were prepared to pay three or four times more than the minimum area tax. But 16 of the 26 concessions were not awarded to the highest bidder. In most cases, the interministerial committee (made up of representatives of five ministries, the national industry syndicate, and the National Assembly) recommended that concessions be allocated to the company ranked first according to the technical criteria, even if the financial bid was much lower. Then, after the recommendations were submitted to the Prime Minister for approval, six concessions were awarded to individuals who did not even appear on the list reviewed by the commission, but are known to have been key supporters of the regime. Strictly speaking, the law was respected because it reserves for the Prime Minister the right to overrule the committee's recommendations in cases where the national interest is threatened, but the government's decision emphatically broke the spirit of the law.

Illegal Logging

The failure of the August 1997 auction had serious environmental implications. Many individuals awarded concessions did not have the technical or financial means to start logging, let alone prepare management plans. The result was a severe shortage of wood and a boom in illegal logging.

Pressure on the forest had been building since 1993, when the World Bank asked the government to stop any further attribution of licenses until the new law was implemented. According to the French regional policy advisor at the time, this was a mistake, given the inevitable delays in implementation, because it penalized companies that needed wood for their sawmills, and encouraged them to engage in "anarchic and illegal logging practices that once in place are difficult to stop."[10]

Working in collusion with provincial governors, companies exploited loopholes that allowed them to circumvent the law. Three permits, *certificat de main levée, permis de récupération*, and *permis d'exploitation*, were widely used to this end.[11] A World Bank mission to the East Province in August 1999 concluded that these permits have resulted in the cutting of an almost limitless amount of wood (World Bank, 1999).

Paradoxically, the increase in illegal logging is related to two measures included in the 1994 Forest Law: higher area taxes and the legal recognition of community forests. Higher area taxes have had two effects. First, they have made large concessions more expensive to log than *ventes de coupe*. The minimum area tax payable on *ventes de coupe* is more than on concessions, but the former require no management plans and can be cut in a year, whereas the latter require management plans and the area tax is payable on the whole concession for 30 years. As a result, the area tax burden on wood cut from concessions is three times that on wood cut from *ventes de coupe* on a per volume basis. Not surprisingly, loggers prefer cutting in *ventes de coupe*.

Second, higher area taxes and inadequate government control mean that illegal logging is both easy and profitable.[12] This "push" factor is now matched by a strong "pull" factor. In 1996, MINEF granted villagers the right to receive 1,000 CFA per cubic meter of wood cut. Villagers have often resorted to violence to defend their customary forests against loggers, but now they encourage loggers to cut illegally in exchange for 1,000 CFA per cubic meter. Loggers are happy to pay this tax, because villagers protect them from government interference.[13] According to one observer, for every *vente de coupe* that is logged legally, four are logged illegally.[14]

The 1,000 CFA tax has also aggravated social divisions. Villagers resent the fact that communes often keep the 10 percent of the area tax that villagers are entitled to. This tax should be used to pay for schools, wells, and other public infrastructure requested by the village management committees. Instead, a false invoice is often prepared, no investment is made, and the communes spend the money on beer or political campaigns. The 1,000 CFA tax, on the other hand, goes straight to the villagers, and represents the first direct financial benefit that they have received from logging. This has led to the formation of an alliance between the villagers and loggers against the communes, which threatens to undermine the government's decentralization program.

Community Forests

Some observers believe that MINEF authorized the 1,000 CFA tax to weaken the villagers' interest in acquiring community forests. At the World Bank's insistence, the 1994 Forest Law included provisions granting villages the right to establish community forests. These provisions, unique in Central Africa, represented an important equity objective; but as they appear in the law, they are unclear, contradictory, and open to abuse. Community forests are located in the same zone as the *ventes de coupe*, and some government officials have submitted fraudulent requests to secure community forests without the informed consent of the local population. Large sums are at stake. In one case, local MINEF officials working in collaboration with a Lebanese logging company tried to acquire five community forests for a payment of one million CFA and the construction of a community shelter, a total offer of about US$2,500.[15] The timber cut from this area would have been worth over US$10 million.

At the World Bank's insistence, the 1994 Forest Law included provisions granting villages the right to establish community forests. These provisions, unique in Central Africa, represented an important equity objective.

The World Bank has been criticized for not taking into account Cameroon's land reform project in the mid-1970s, which was hijacked by well-positioned government officials who sought title to land over which they had no right.[16] The World Bank's strategy was to delegate responsibility to the British-funded Community Forest Development Project (CFDP), which would establish the legal framework and administrative capacity within MINEF to implement the provisions. The project, which started in 1995, received a hostile reception from some officials because it threatened their ability to subvert the allocation process for personal gain. In November 1998, after a six-month delay, the Minister finally approved a manual outlining the procedures and standards governing the allocation and management of community forests (MINEF, 1998).

While implementation has been problematic, the community forest provisions have made local communities more aware of their rights with respect to the government and logging companies. This has resulted in villagers demarcating their customary forests in order to benefit financially from logging and to protect their land against the claims of adjacent communities. Increased awareness of the law has also led to the almost instantaneous diffusion of information about the tax benefits to which communities are entitled (Karsenty, 1999b).

World Bank Reaction

The World Bank reacted strongly to the outcome of the August 1997 auction, sending a letter to the Prime Minister and following up with a mission in January 1998. However, at an initial meeting, the World Bank told the Minister of Economy and Finance that it understood if, for political reasons, the government was obliged to break the law. This attitude was passed on to the Prime Minister who, when asked at a subsequent meeting by World Bank officials what he planned to do about the auction irregularities, refused to respond, knowing that the issue was not a deal-breaker.

According to the team leader at the time, the World Bank "was at the peak of its power."[17] Although no SAC was in place, even the threat of suspending the SAC III negotiations would have forced the government to review the auction results. The government had its back to the wall because financial assistance was also denied from bilateral donors, including France, whose support was conditional on Cameroon reaching agreement with the World Bank. A number of options were open to the World Bank, short of implicitly condoning the government's behavior. It could have accepted the results of the auction, but requested that the concessionaires pay an area tax equal to the highest bidder, and then followed up to ensure that the area taxes were paid. Or it could have warned the government that any irregularities in the next auction would lead to canceling the SAC.[18]

Yet, the World Bank chose not to pursue such face-saving options. Some World Bank staff interviewed for this report suggest that the decision not to hold the government accountable was motivated by the World Bank's sensitivity toward France's strategic concerns.[19] According to this argument, forest policy reform was so politically sensitive that if the World Bank forced the government to keep its promises, it would default on its debt, possibly leading to economic collapse and civil unrest. Approval of SAC III would have permitted the conversion of high interest, no-grace-period IBRD loans to low interest, 40-year grace period IDA loans, and helped Cameroon to repay its debt to the World Bank.

World Bank staff closely involved in the SAC negotiations strongly deny this interpretation.[20] In fact, the SAC included strict financial conditionalities, which the government was able to meet because of an unexpected increase in the price of oil. According to these sources, the World Bank's decision not to force the government to back down on forest issues was based on what it believed to be in the best interests of the country. By early 1998, the World Bank had only just established a substantive dialogue with the government over privatization, and restructuring of the banking, energy, and transport sectors. Breaking off relations over the concession auction would have sacrificed this broader policy dialogue, setting back progress in sectors that many staff considered to be critical to Cameroon's development. Given the problems implementing forest policy reform and the delicate nature of its relations with the government, some World Bank staff argued against including any forest conditionalities in SAC III.[21]

Regaining the Initiative

In early 1998, the World Bank official responsible for leading the negotiations since 1993 left the team, and more than six months passed before a new team leader was appointed. The new team leader visited Cameroon in October 1998, two months after SAC III was approved. After lengthy internal discussions, the World Bank decided to include forest conditionalities in the SAC. Thus armed, the mission insisted that the government take two steps: first, clarify the rules governing the bidding process to avoid any possible future misunderstanding, and second, appoint an independent observer who would report publicly on the bidding process. The government agreed to the first, but the Prime Minister, who wanted to preserve his room for maneuver, was opposed to the second.

However, in the face of World Bank threats to cancel the SAC, the Prime Minister issued two decisions *(arrêtés)* that met these conditionalities. The new auction rules included three changes intended to increase transparency and reduce the scope for fraud. First, bids would be assessed based on a list of yes and no questions. Second, criteria other than

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the actual bid price would represent less than 20 percent of the total score. Finally, bidders were required to deposit a down-payment of two percent of the area tax for the whole concession, which could amount to hundreds of thousands of dollars.

The World Bank continued to maintain pressure on the government. In March 1999, it demanded that many senior MINEF officials be replaced because of poor performance related to the management of the World Bank-supported Campo-Ma'an protected area in southwest Cameroon. This time the World Bank's request was backed up with threats to suspend negotiations over the Chad-Cameroon pipeline, which would terminate at the nearby port of Kribi. With a new management team in place, MINEF published a report showing the extent of illegal logging and providing performance goals against which it could be held accountable (MINEF, 1999). The Ministry also declared that it would cancel the six concessions awarded to supporters of the regime because of their failure to pay the area tax or prepare a forest management plan.

By the end of 1999, the World Bank had regained the initiative that it appeared to have lost after it backed down over the August 1997 auction. Sources outside the World Bank consider the appointment of an independent observer to be an important precedent. The observer's report on the *vente de coupe* auction in September 1999 showed that in many cases the interministerial committee responsible for reviewing the bids ignored the new auction rules (Behle & Associés, 1999), demonstrating once again the government's resilience in the face of externally imposed reforms. Nevertheless, the independent observer was allowed to carry out his functions without interference, and his report was made public, suggesting that there is scope for similar process reforms that increase transparency and accountability in the forest sector.

THE ROLES OF OTHER STAKEHOLDERS

The main protagonists involved in forest policy reform were MINEF, the Presidency, the National Assembly, and the World Bank. The private sector and the French government played secondary roles, and NGOs had minimal input into the discussions.

Private Sector

The logging industry in Cameroon is large and diverse. By 1999, there were over 600 registered logging companies, up from 200 in 1992, of which only 60 had ongoing logging or wood processing operations (Carret, 1998). With the exception of the Lebanese company Hazim, the largest of these are in European hands, with French companies comprising a majority with significant involvement of Italian, Belgian, and Dutch interests (Burnham and Sharpe, 1997). Beneath this first rank of foreign companies, many of which have large sawmills, lies a second rank of companies, which have small sawmills to process a minor portion of their logs. These two tiers constitute the industry's formal sector. Below them is a third tier of yet smaller companies run by Lebanese, Greek, or Cameroonian nationals. These companies, which constitute the informal sector, typically have very limited capitalization, do not have their own sawmills, and depend on *fermage*.

The largest companies were not active during the drafting stage of the 1994 Forest Law, despite their formidable lobbying power—a position that reflected their ambivalent attitude toward reform. On the one hand, they favored a simpler and more transparent tax system. On the other, reforms implied higher costs and more liabilities. Once the law was passed, however, industry representatives met regularly with World Bank staff.

Companies stood to gain from the new law. First, the World Bank promised that, while the minimum area tax would be increased, it would be largely offset by lower taxes on log exports. Cameroon already had the highest tax rates in Central Africa, and the World Bank did not want to increase the overall tax burden, beyond the additional area tax offered by the companies when the concessions were auctioned (Carret, 1998). Second, the reforms would grant them larger and longer concessions. Third, they supported the World Bank's opposition to a log export ban. Finally, they backed its recommendation that the Office National de Développement des Forêts (ONADEF), which held a de facto monopoly on the provision of forest inventory, mapping, and other technical services, be liquidated.

However, the industry disagreed with the World Bank on two basic points (Carret, 1998). First, the industry was opposed to a significantly higher area tax because, while it represented less than 20 percent of the tax burden, it was a fixed tax and payable up-front and on the whole concession, not just the area logged annually. Second, the World Bank wanted to reduce the protection for domestic sawmills, which it believed encouraged inefficient processing, by raising taxes on processed wood exports, which had previously been untaxed. The industry, on the other hand, argued that inefficient processing was due to the lack of skilled labor and the poor quality of the logs, and called for continued protection for Cameroon's developing industry.

In June 1997, in order to meet the IMF's tax revenue targets, the government introduced two major changes in the Finance Law: export taxes on processed wood were almost doubled, and the reference values used for tax purposes were set at the highest market prices (Carret, 1998). The World Bank opposed these tax increases. In 1995, the Minister for Economy and Finance had reached an informal understanding with the industry that 27-30 billion CFA was a reasonable level of direct taxation. Exports had increased by 20 percent, which would have justified a slightly higher tax burden, but not a doubling. The World Bank was concerned that such increases would reduce the profitability of the logging industry and its international competitiveness. More importantly, it feared that the proposed tax increases would overtax the "good" companies that do pay taxes and reward the "bad" ones, who would find ways not to pay. It argued that more emphasis should be put on improving tax recovery, rather than raising taxes. During the June 1997 mission, the World Bank discovered that the government should have collected 19 billion CFA in log export taxes between July 1996 and May 1997, compared to the 14 billion CFA that was actually collected. One billion CFA of this shortfall was explained by delays in tax payment, but five billion CFA was never collected (Ferrer, 1997).

As the World Bank predicted, the industry hotly contested the proposed tax changes and went on strike in September 1997. The government quickly backed down and canceled the changes. The World Bank criticized this decision, favoring a compromise solution whereby the export taxes on processed wood would be raised to a more realistic level and the market prices discounted by 15–25 percent. The industry's angry reaction reflected its growing mistrust of MINEF. The Ministry enacted 15 changes in taxation between 1995 and 1998, many of which the industry considered to be arbitrary and unfair.[22] As one industry official put it: "If we obeyed the law, we'd go bankrupt."[23]

The larger companies resented that the formal sector was being asked to shoulder a growing share of the tax burden, since many small companies were able to avoid paying any taxes (Burnham and Sharpe, 1997).In principle, once felled, all logs are individually recorded and taxed at various stages in their movement from the forest to the sawmill or port, but given the lack of control exercised by MINEF staff in the forest, these companies paid little or no tax. When their tax arrears reached major proportions, they should have been legally sanctioned by being stripped of their forest concessions and barred from logging until their back taxes were cleared. However, less scrupulous operators often declared bankruptcy, then reconstituted themselves under a new corporate name, and cleared their tax arrears by paying a small portion of the sum outstanding as a bribe to officials to secure their compliance. The industry was angry at MINEF's apparent complicity in these practices, and its reluctance to enforce any part of the law other than new taxes imposed on the formal sector. Symptomatic of what the industry considered to be the Ministry's lack of seriousness is that it exerted no pressure on companies to prepare forest management plans and failed to respond to those companies that submitted them.

Given the failure of many established companies to win concessions, a shortage of wood to feed the sawmills, constant changes in taxation, the government's reluctance to crack down on tax fraud, and a growing set of costly obligations to local communities, the industry felt under attack from all sides. In response, 15 large European companies operating in Central Africa established the Interafrican Forest Industries Association (IFIA) to give the industry a single voice in forest policy negotiations in Cameroon and elsewhere in Africa.[24]

IFIA was highly critical of the World Bank, which it accused of hiring experts without the necessary experience; constant shifts in policy; presenting *faits accomplis* with no opportunity for discussion; and failing to respond adequately to its written proposals.[25] Contrary to these assertions, the World Bank claims that industry representatives were regularly invited to discuss the content of the new law.[26] Although civil, the discussions apparently went nowhere because of the industry's refusal to agree to concession auctions and higher area taxes—key ingredients of the reform package. Interviews with company officials suggest that they were not opposed to the reforms proposed by the World Bank per se, but the fact that the reforms failed to take into account the high level of policy instability in Cameroon. This instability substantially increased the cost of doing business and put a premium on security, which translated into a desire on the part of industry for very large concessions, minimal area taxes, and no auctions.[27] The World Bank's reform agenda threatened these objectives. The real target of the industry's anger was not the World Bank, but the Government of Cameroon. For obvious reasons, industry preferred not to blame the government publicly for its problems.

France played an ambivalent role during the reform process—an attitude that reflected its rapprochement with the IMF and its desire to protect its economic interests.

France

France played an ambivalent role during the reform process—an attitude that reflected its rapprochement with the IMF over the need for macroeconomic adjustment in Cameroon, and its desire to protect its economic and geopolitical interests. Cameroon is the second largest economy and France's second largest trading partner in francophone Africa. France had viewed Cameroon as a bulwark against the tide of anglophone influence from Nigeria, its giant neighbor. On several occasions, France had bailed out the Government of Cameroon when confronted with the need to make painful reforms that might have led to political instability. For example, while negotiating with the IMF in 1988, the government convinced France to extend 400 million French francs to rehabilitate several government-owned corporations that had been slated for elimination.

In October 1993, however, the French government pronounced the “Abidjan doctrine,” whereby it refused further budgetary support to countries without an IMF agreement in place. This marked a watershed in relations between France and the IMF, and in January 1994 the CFA was devalued by 50 percent against the French franc, an act long advocated by the IMF. France, therefore, did not overtly oppose the World Bank during the forest policy negotiations, since the government’s failure to reach agreement on key reforms could have led to canceling of vital macroeconomic support. Neither did it provide the high-level political support that would have strengthened the government’s commitment to policy implementation.

France was opposed to specific policy measures, notably a log export ban and concession auctions, which threatened the interests of politically influential French logging companies.[28] The World Bank proposed that the first round of auctions be limited to companies with existing sawmills, which effectively gave large French companies the right of first refusal on concessions located near their sawmills. France was also against higher area taxes, but in this case its opposition was tempered by the fact that French companies were divided on the issue. The second tier of French companies supported the tax reforms, because they could neither negotiate tax breaks nor easily evade taxes. Large companies, on the other hand, had benefited from high levels of government discretion; even after 1994, some were able to negotiate special deals. In 1995, according to well-placed sources, Thanry, the largest French logging company in Cameroon, was exempted from paying export taxes for three years on ayous, one of the most important commercial tree species, in exchange for building a sawmill. Since that species represented half of Thanry’s production and the company accounted for one third of Cameroon’s wood exports, the financial loss to the government was in the millions of dollars.[29]

France’s support to the reform process was confined to providing technical input to drafts of the Forest Law and the Implementation Decree. This included recommendations based on the results of the Aménagement Pilote Intégré (API) project in Dimako in the East Province about minimum concession size, sustainable yield calculations, forest inventory methods, and improved logging practices (CIRAD, 1998). France also offered financing to qualified logging companies (not just French ones) to prepare forest management plans.

French sources suggest that the World Bank tried to go it alone without adequate consultation. World Bank staff deny this accusation and claim that the French government was consulted every step of the way, and that every mission included a briefing for donors, including France. They say that the allegation that France was marginalized misrepresents the World Bank’s open approach during the reform process.[30]

NGOs

International conservation NGOs strongly supported the community forest provisions in the 1994 Forest Law, and carried out campaigns to inform local communities of their new rights, much to the annoyance of the logging companies. The World Wide Fund for Nature's office in Cameroon played a key role in raising the profile of forest issues, both domestically and internationally. This heightened sensitivity contributed to President Biya's decision to host a summit meeting in March 1999, which brought together the leaders of Gabon, Central African Republic, Congo-Brazzaville, and Equatorial Guinea, as well as high-level participants from around the world, to jointly announce plans for a new cross-border protected area. According to the World Bank, this summit may represent a watershed in terms of securing high-level political commitment for the reform process.[31]

Domestic NGOs were only legalized in 1990 and were weak at the start of the reform process. But they have since developed rapidly, as shown by their advocacy related to two recent World Bank projects: the 1995 transport sector loan and the proposed Chad-Cameroon pipeline. In both cases, domestic NGOs drew international attention to the potential negative environmental impacts of these projects, and the need to prepare publicly available environmental impact assessment and mitigation plans.

The controversy surrounding the passage and implementation of the 1994 Forest Law raised awareness among domestic NGOs of the inherently political nature of forest policy reform. Some expressed strong support for tying reforms to structural adjustment lending. Others argued that lasting improvements in forest management require that the concession allocation and tax systems be insulated from political pressure, and have called for an overhaul of the legal system to allow private citizens to sue the government and logging companies in the name of public interest. They recognized that tackling forest policy effectively might require linking adjustment lending to institutional reforms outside the forest sector.[32]

THE BOTTOM LINE

The World Bank devoted a huge amount of effort to reforming Cameroon's forest policies, but the results have proved disappointing. Indeed, the flawed first round of concession auctions, the subversion of the community forest allocation process, and pervasive illegal logging, have led some observers to suggest that the situation is worse than before. But others argue that while the reforms have been poorly implemented, they have not been derailed and that the World Bank's intervention has been, on balance, a good thing.

The long and convoluted history of the reform process yields a number of insights. First, forest conditionalities were essential for ensuring the passage of key laws and decrees, but proved ineffective at enforcing the institutional changes needed to implement them. MINEF failed to participate effectively in the reform process because of its internal weaknesses, conflict of interest, and the lack of high-level political support.

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During the negotiations, the World Bank put demands on the Ministry for policy papers and studies that it had neither the ability nor authority to carry out. The result was a growing gap between what the World Bank demanded and what the Ministry was able (or willing) to deliver. The World Bank intended to follow up the policy reforms with a forest project to strengthen the Ministry's analytical capacity. It may have been more effective to combine the policy dialogue with targeted World Bank support to increase the staff's sense of ownership of, and commitment to, the reforms.

Second, the World Bank was unable to overcome strong vested interests within the private sector and French government. Many logging companies had benefited from the previous discretionary practices and were opposed to change. Their opposition explains why the views of many industry officials differ markedly from those of the World Bank regarding its willingness to seriously engage them. Although the World Bank often consulted the industry, irrevocable differences of opinion over what constituted sound forest policy may have blocked any meaningful dialogue. While France contributed technical input to the reform process, it withheld political support for fear of destabilizing the regime and upsetting the major French logging companies.

Finally, the World Bank was caught in a dilemma following the failure of the August 1997 auction. On the one hand, the World Bank's credibility required that it hold the government accountable for the auction irregularities; on the other, it did not want to jeopardize its dialogue over key economic reforms. By wavering at a critical point in the negotiations, it avoided provoking a possible political crisis. But, according to World Bank technical staff, it missed a golden opportunity to reinvigorate the forest policy reforms. This decision may have inflicted broader damage. According to outside observers, there are younger foresters in Cameroon who seem concerned about greater efficiency and transparency, but if they are not supported and encouraged by outside pressure, they could well be subverted by the corrupting influence of their seniors (Burnham and Sharpe, 1997). Every time the government is allowed to get away with breaking the law, the prospects for real change diminish, and the hopes of this group of professionals fall. This example suggests that the long-term commitment by the World Bank that is required to promote accountability and the rule of law in the forest sector is vulnerable to the needs of short-term political expediency.

By wavering at a critical point in the negotiations, the World Bank avoided provoking a possible political crisis. But, according to technical staff, it missed a golden opportunity to reinvigorate the forest policy reforms.

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NOTES

1. This chapter draws on "Environmental Adjustment in Cameroon: Challenges and Opportunities for Policy Reform in the Forest Sector" by François Ekoko (1999), which is available at http://www.wri.org/iffeforest.html, as well as interviews conducted by the authors in Cameroon and Washington, D.C. on a not-for-attribution basis. This paper was prepared with financial support from WRI and incorporates material from Ekoko (1997), which was prepared with financial support from the Center for International Forestry Research (CIFOR).

2. The Ministry of Environment and Forests was created in 1992 by separating the forest portfolio from the Ministry of Agriculture.

3. Canada also supported the preparation of a provisional 1:500,000-scale land use map and a reconnaissance-level forest inventory that divided the southern part of Cameroon into permanent forest and non-permanent forest. Future concessions, each consisting of one or more forest management units (*unités forestières d'aménagement*), were to be located in the permanent forest zone, and *ventes de coupe* in the non-permanent forest zone.

4. The previous level, unchanged since independence, was 98 CFA/ha per year.

5. Concessions were to be awarded for a 3-year interim period, during which the company would have to complete an approved forest management plan. During this period, the company could log no more than 2,500 ha per year to help pay for the plan.

6. In addition to MINEF, these included ONADEF, the National Assembly, the Presidency, and the Ministries of Industrial Development and Trade, Tourism, Urbanization, and Housing.

7. Not-for-attribution interview with French Cooperation staff, Yaoundé, October 1998.

8. Not-for-attribution interview with World Bank staff, Washington, D.C., April 1999.

9. Not-for-attribution interview with World Bank staff, Washington, D.C., November 1999.

10. Not-for-attribution interview with regional policy advisor, Yaoundé, September 1999.

11. In the first case, the governor claims that a certain volume of wood has been felled illegally and issues a permit to a company for its removal. In the second case, a company claims that it needs to clear forest to build a road or establish a plantation. In theory, this requires a forest inventory to calculate the stumpage tax. In practice, a false inventory is carried out, a lump sum fee paid to the governor, and the company cuts all the wood it wants. A *permis d'exploitation* entitles cutting up to 500 m^3 in already logged forest, but loggers often cut 50,000 m^3 (World Bank, 1999).

12. In the East Province, source of over half of Cameroon's log production, 109 MINEF staff, equipped with four telephones, two pickups, and two motorbikes were responsible for managing an area the size of Rwanda. By 1992, there was not a single working vehicle. Ministry staff were forced to rely on logging companies

for transport, a situation that did not encourage independent reporting of logging activities.

13. The inability of MINEF staff to sanction illegal practices is reflected by the sharp drop in the number of violations issued against loggers in the Center Province since 1989, and a similar drop in the proportion of violations that were processed. The situation in remoter areas is even worse: between 1989 and 1997, 800 violations were issued in the Center Province, but only 35 in the East Province (Global Forest Watch-Cameroon, 2000).

14. Not-for-attribution interview with social forester, Yaoundé, December 1999.

15. Not-for-attribution interview with SGS staff, Douala, October 1998.

16. Not-for-attribution interview with World Wide Fund for Nature staff, Yaoundé, October 1999.

17. Not-for-attribution interview with World Bank staff, Washington, D.C., November 1999.

18. Not-for-attribution interview with World Bank staff, Washington, D.C., December 1999.

19. Not-for-attribution interview with World Bank staff, Washington, D.C., November 1999.

20. Not-for-attribution interview with World Bank staff, Yaoundé, December 1999.

21. Not-for-attribution interview with World Bank staff, Yaoundé, April 1999.

22. CERNA, a Paris-based industrial research center hired by IFIA, the logging industry association, to carry out a review of forest taxation in Cameroon, argued that the lack of a reliable statistical database on timber production greatly increased the scope for misunderstanding (Carret, 1998).

23. Not-for-attribution interview with logging company staff, Yaounde, November 1997.

24. Since its creation in 1996, IFIA has committed itself to developing guidelines for "practical" forest management plans, drafted a professional code of conduct, and offered technical assistance to a pan-African forest certification system (IFIA, 1999). It has also sought to establish working relationships with a number of conservation NGOs.

25. Written comments from IFIA on draft report, Paris, September 1999.

26. Not-for-attribution interview with World Bank staff, Washington, D.C., November 1999.

27. Not-for-attribution interview with IFIA representative, Washington, D.C., November 1999.

28. Not-for-attribution interview with World Bank staff, Washington, D.C., October 1999.

29. Not-for-attribution interview with SGS staff, Douala, October 1998.

30. Not-for-attribution interview with World Bank staff, Washington, D.C., November 1999.

31. Not-for-attribution interview with World Bank staff, Yaoundé, November 1999.

32. Not-for-attribution interview with domestic NGO staff, Yaoundé, December 1999.