

The Ramin Racket

The Role of CITES in Curbing Illegal Timber Trade





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- Stop illegal trade in endangered species
- Gain lasting protection for species under threat
- Protect the shared environment of man and wildlife.

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Front cover:

Raft of illegal logs on the Seruyan River, near Tanjung Puting National Park, Indonesia.

Back cover:

Ramin dowels on sale in Italy

Left:

Map of South-East Asia.

Front cover photo: © Sam Lawson/EIA/Telapak.
Back cover photo: © Sam Lawson/EIA/Telapak.





The Illegal Logging Crisis

Over the last century, many of the world's ancient forests have disappeared at the hand of man. The urgent need to protect this vanishing resource has long been recognised, and around the globe efforts and resources have been poured into halting the decline.

Yet in spite of these efforts, the destruction of the world's forests continues, and in many places is actually accelerating. The main reason for this continuing devastation is illegal logging, which is rampant in tropical and non-tropical forests across three continents. More than three quarters of logging in Brazil and 50 per cent in Cameroon is illegal.¹ As much as a third of Russian timber is stolen,² while in Indonesia the illegal logging rate is estimated to be 80 per cent.³

This is not about poor people being forced by circumstances to take what they can to survive. This is illegal logging on an industrial scale, being carried out by large companies to feed an uncontrolled and burgeoning global demand for cheap timber and wood products. It is being orchestrated by well-organised and powerful crime syndicates, whose bosses wear Rolex watches and fly first class.

This anarchy is having devastating effects. In Indonesia, home to ten per cent of the world's remaining tropical forests,⁴ the rate of forest loss is greater than ever before. An area of forest larger than Taiwan (Province of China) is being lost every year.⁵ Critically endangered species dependent on these forests, like the orangutan, face imminent extinction.

Uncontrolled logging also leads to devastating fires, landslides and floods, endangering biodiversity and wreaking havoc on forest-dependent communities. It is starving developing countries of money sorely needed to fund schools, hospitals and sanitation. Efforts by these countries to rein in the activities of the timber barons are rendered futile in the face of systemic corruption, fuelled by the vast profits being made.

The bulk of this illegal wood is exported, and most finds its way onto shelves and into homes in the rich countries of North America, Europe and East Asia. The US, Europe, Japan, Canada and Russia together consume 74 per cent of the timber in global trade.⁶ Unless action is taken in these markets to staunch the flow of illegally sourced wood, there is little chance the problem can be solved.

Left:
Illegal logger in
Gunung Leuser
National Park,
Indonesia.



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Executive Summary

The world's forests are being rapidly destroyed by a tidal wave of illegal logging, driven by an unregulated international trade in stolen wood. These forests are home to most of the species listed on the CITES Appendices. Though the international community has committed to take urgent action to tackle illegal logging and associated trade, listings on CITES are currently the only means by which consuming countries can halt shipments of illegally sourced timber and wood products.

Indonesia's Appendix III listing of ramin (*Gonystylus spp.*), an endangered tree being logged illegally in National Parks, has proved that CITES can be a powerful tool in protecting forests from the scourge of timber theft. Though it is not the ultimate answer to the problem, where appropriate CITES could - and should - be doing much more. Further Appendix III listings of threatened tree species are justified and should be supported. Implementation and enforcement of Appendix III must also be improved.

Despite the success of the current listing, ramin remains under threat. The remnants of Malaysia's ramin forests are being exploited unsustainably, despite nominal protection. Though ramin is banned from cutting and export in Indonesia - the only other significant range state - stolen wood continues to be laundered through neighbouring Malaysia in quantities which exceed the global annual legal supply. Experts agree that ramin qualifies for inclusion on Appendix II, and such a listing would provide much needed additional protection. This listing should be supported, as should the inclusion of processed parts and products, which represent the vast majority of international trade.

Illegal logging is rampant in tropical and non-tropical forests across three continents.



CITES is currently the only means by which importing countries can seize illegally sourced wood.

The Role of CITES

The sheer scale of the illegal logging epidemic has prompted a range of political responses over the last five years. Meetings of the G8 group of major economies,⁷ the UN Convention on Biological Diversity⁸ and the International Tropical Timber Organisation⁹ have all seen announcements by nations of their intention to work to halt illegal logging and associated trade. The European Union (EU) has produced a landmark Action Plan to tackle the problem,¹⁰ and the US has launched a 'Presidential Initiative' on illegal logging.¹¹ At the World Summit on Sustainable Development in 2002, the countries of the United Nations pledged to "take immediate action on domestic forest law enforcement and illegal international trade in forest products".¹² A number of bilateral agreements have since been signed.¹³

Unfortunately, these political pronouncements have yet to produce meaningful actions. Endless studies have been commissioned which serve only to reiterate what was known already. Meanwhile, the destruction continues. A major reason for the failure to act is that consuming countries do not have laws banning the import

of illegally sourced wood. Consequently, as soon as vessels carrying stolen timber and wood products reach international waters the cargo is effectively legalised, and importing states cannot deny entry.

Consuming countries, led by the European Union, are beginning to recognise this problem and consider new laws. Yet this is a terribly slow process, while there is an urgent need for action. In this evolving political context CITES offers a mechanism for a rapid response, and is currently the only means by which importing countries can seize illegally sourced wood. Recognising this, the EU Action Plan specifically commits member states to furthering the use of CITES to tackle illegal trade.

EIA/Telapak do not believe that CITES represents the only or the ultimate answer in tackling the issue of illegal logging and associated illegal trade, but until alternative measures are adopted CITES represents a powerful tool which should be used where appropriate.



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Ramin has been logged out in most of its range.

© Kirsten Tison/The Orangutan Foundation

Ramin: A suitable case for CITES

Ramin (*Gonystylus spp.*) is a blond coloured tropical hardwood, native to the fragile peat-swamp forests of Indonesia and Malaysia. These forests provide critical habitat for a host of endangered species, including the orangutan and the Sumatran tiger. As the most valuable wood species in these ecosystems, ramin trees are usually the first target of illegal loggers, and selective logging of these trees is often the first step leading to forest clearance and incursion into National Parks.

Ramin is prized for its appearance, fine grain and easy working properties. Processed ramin can fetch up to US\$1000 per cubic metre.¹⁴ The majority of the international trade in ramin wood is in semi-finished parts and products, and most ramin cut in Indonesia and Malaysia will eventually find its way into homes in the lucrative markets of Europe, East Asia and North America in the form of picture frames, wood blinds, pool cues, furniture, tool handles and decorative mouldings.

As a result of over-cutting, ramin has now been logged-out in most of its range, and the quantity in trade has declined as the species has become increasingly scarce. Ramin regenerates poorly in logged-over forest, and the species has never been successfully grown in plantations. Over the last two decades, much ramin habitat has been cleared to make way for oil-palm plantations. Ramin has been placed on the World List of Threatened Trees and is classified

by the World Conservation Union (IUCN) as vulnerable to extinction in the wild.¹⁵

In 1999, investigations carried out by EIA/Telapak revealed widespread illegal logging of ramin in Indonesia's protected areas, including the world famous Tanjung Puting National Park, one of the last sanctuaries for the endangered orangutan. Subsequent investigations showed how this illegal ramin is smuggled out of the country and on to the world market.¹⁶

In response to growing concerns about illegal logging and trade, in 2001 the Indonesian government banned all cutting and export of ramin, except for a small quantity from a concession certified as sustainably managed. Indonesia also listed the species on Appendix III of CITES. When the listing came into effect in August 2001, Malaysia entered an official reservation against the listing of ramin parts and products other than logs and sawntimber, effectively refusing to implement the listing for these items.

Above:
Raft of illegal logs in Tanjung Puting National Park, Indonesia.

Left:
Illegal loggers are destroying the forest home of critically endangered species including the orangutan.



Vessels used to transport stolen ramin have been blocked by CITES controls from reaching destinations abroad.



© EIA/Telapak

Right:
Enforcement agents breaking up rails used to transport illegal ramin logs, Tanjung Puting National Park.

The Effectiveness of Appendix III

Despite the Malaysian reservation, the listing of ramin on Appendix III of CITES has shown that CITES can be an effective tool in tackling the trade in illegally sourced wood.

EIA/Telapak's independent monitoring of the listing's effectiveness shows that, despite the intransigence of some Parties, it has had a positive impact where it matters most – in the forests.

In Indonesia's protected forests, including Tanjung Puting National Park, illegal logging of ramin has been reduced. While enforcement action has been important, local sources note that the increasing difficulty in transporting and selling stolen ramin overseas has also played a part.¹⁷ Though ramin is still targeted, loggers and traders have been forced to reduce and conceal their activities, adding cost and reducing profit margins. In some areas vessels used to transport stolen ramin have been lying idle, blocked by CITES controls from reaching destinations abroad.¹⁸

These changes on the ground have been increasingly driven by implementation and enforcement of the ramin listing in consuming countries. Gradually the market for illegal

ramin is being closed. This has been most noticeable in the key markets of Europe and North America. While ultimately consuming around two-thirds of global ramin production,¹⁹ countries in these regions also tend to take the highest quality wood and provide the best prices.

Despite initial problems, enforcement of the listing in key consuming countries has been effective, as shown by a dramatic drop in reported imports (see graph). Successful seizures of processed ramin wood and products have been made in a number of countries including the UK, Italy and the US.

In the US, shipments of dowels, mouldings, baby cribs and other products have been stopped and companies fined. More than 80 000 billiard cues from China, worth more than US\$1 million, have been seized over the past two years.²⁰ In 2002 UK customs intercepted thousands of metres of ramin picture frame mouldings which had arrived from Indonesia without CITES permits under a false species name. This was the UK's largest ever seizure of wood and the importing company had to pay £130 000 (\$250 000) in forfeited goods and fines.²¹



It has been claimed that Japan and Taiwan (Province of China) do not implement Appendix III for imports,²² undermining Appendix III listings of timber species such as ramin. In fact Japan has detailed procedures in place to implement the ramin listing,²³ while Taiwan (Province of China) has also been monitoring ramin imports. Following an exposé by EIA/Telapak of illegal exports of ramin furniture, in August 2004 Taiwanese regulations were amended in order to fully implement all Appendix III listings.²⁴ Despite the country's reservation, Malaysia also regularly issues CITES documents for shipments of processed ramin because of import controls in consuming states. This gives the lie to Malaysia's claim that implementation of the listing for such items would be impossible.

The most compelling evidence of the effectiveness of the listing and subsequent seizures in reducing trade in stolen wood comes from the illegal traders themselves. Over the last three years, EIA/Telapak have carried out a series of undercover investigations into the ramin trade across Asia, and in consuming countries including the UK and Italy. These investigations have involved contacts with a host of players - from Singaporean timber traders to Malaysian shipping agents, from American cue importers to Italian picture frame dealers, and from Taiwanese baby-crib manufacturers to British wood blind retailers.²⁵

In the months immediately following the Appendix III listing, EIA/Telapak found traders were often ignorant of the new controls, while others were dismissive of the likely effects. Yet subsequent seizures soon sent shock waves through the industry, as shipments were confiscated or held up and customers lost. Once they started losing money, manufacturers and traders of ramin timber and wood products quickly took notice. While these investigations have also uncovered continued instances of



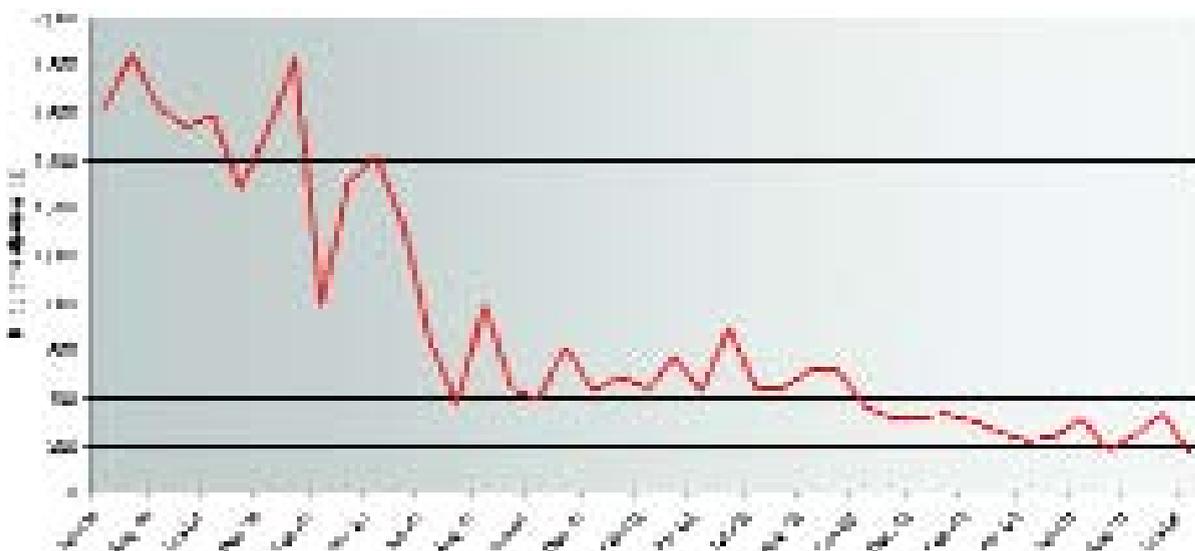
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illegal trade, the listing has clearly made a difference.

Above: Ramin picture frame mouldings seized in the UK, March 2002.

Soon after a spate of seizures of ramin baby cribs in the US, EIA/Telapak investigators posing as buyers visited a major manufacturer of these products in China. The company told how they had been forced to legalise their operations: *"If I use ramin and China [does] not give me these papers then we're finished"*, one executive said. *"If you don't submit your papers they just take the containers"*.²⁶

The effective reduction in the supply of ramin to global markets as a result of the Indonesian ban and CITES listing has also been reflected in dramatic price rises. For instance, average values for ramin sawn timber exported from Peninsular Malaysia rose by almost 60 per cent between August 2001 and December 2003, from \$350 per cubic metre to \$550.²⁷



Left: Ramin imports into the US, June 2000-October 2003 (data from US Port Import-Export Reporting Service).



Investigations in late 2003 uncovered ramin laundering on an unprecedented scale.

Malaysian Ramin Laundering

The Malaysian timber industry was founded on the extraction and processing of ramin. As a result, since the early 1960s almost all of the country's ramin peat swamp forests have been logged over at least once, and regeneration has been poor.²⁸ Most of Peninsular Malaysia's original peat swamp forests have long since been cleared to make way for oil palm plantations and other development, and the remainder has reduced by a third in the last ten years. The pattern has been similar in Sarawak, eastern Malaysia.²⁹ Even the remnants of Malaysia's ramin forests, which are nominally protected, continue to be exploited unsustainably (see page 8).

Since most commercially viable ramin stands have already been cut, ramin production levels have dramatically declined – from 560 000 cubic metres in 1990³⁰ to 75 000 cubic metres in 2003.³¹ Yet much of the Malaysian timber industry remains geared toward the processing and export of ramin timber and wood products. To make good the shortfall in raw materials, in the late 1990s the industry turned to neighbouring Indonesia. By the time the CITES listing came into effect, independent industry experts were estimating that as much as 60 per cent of the ramin being processed and exported from Malaysia was being sourced from neighbouring Indonesia.³²

Logically a drop in Malaysia's ramin exports should have occurred after the CITES listing, but since 2001 sawn ramin exports from Malaysia have actually increased,³³ while the supply of ramin from Malaysia's own forests has continued to decline.³⁴

The reason for this conundrum is clear - illegal ramin from Indonesia continues to be imported in large quantities, unhindered by the new controls or Malaysia's CITES commitments. Since 2001, evidence has mounted of the role of Malaysia in laundering illegally sourced Indonesian ramin and other timber. EIA/Telapak investigators visiting Malaysia have repeatedly discovered illegal Indonesian ramin entering the country, each time obtaining video evidence and alerting the relevant authorities.³⁵ A steady stream of seizures is testament to the scale of the smuggling.³⁶

Investigations in late 2003 uncovered ramin laundering on an unprecedented scale. The activities exposed span three Malaysian states and every part of the industry, and involve a quantity of ramin which is greater than the entire world's legal supply. This illegal Indonesian wood is being laundered on to world markets as 'origin Malaysia'.

Below: Evidence of Malaysia's trade in stolen Indonesian ramin, June 2001–November 2003.





Transshipment Fraud

In November 2003, EIA/Telapak visited the major port of Pasir Gudang, at the tip of Peninsular Malaysia near Singapore. In the port investigators uncovered the largest ramin smuggling operation yet seen. During a tour of the port they were shown three huge warehouses stacked high with sawntimber, which port officials admitted was ramin from Indonesia. It was explained how vessels carrying the ramin from the nearby island of Sumatra arrive at the port daily. Once the wood has air-dried, it is packed into containers and shipped onwards to Hong Kong, Taiwan (Province of China) and mainland China.³⁷

A local shipping agent, Andrew Chew, acting on behalf of the Malaysian companies handling the shipments, told EIA/Telapak investigators that all of the ramin is smuggled from Indonesia and none of it has CITES permits. The stolen ramin is purchased from a wealthy timber baron in Sumatra known as the ‘Ramin King’, reputedly a leading member of an organised crime syndicate.

Though he could not obtain Malaysian CITES documents for re-exporting the wood, the agent explained how he obtains false paper trails including Bills of Lading and standard Certificates of Origin disguising its origin. He also claimed he could “buy” CITES re-export permits for the wood in China and Hong Kong.

An official of the privatised port authority told how he had brought the ramin transshipment business from Singapore in late 2002, and how since then around 4500 cubic metres of Indonesian ramin had been passing through the port each month. Annually this is almost twice as much ramin as is legally produced in the whole of Malaysia,³⁸ and is greater than the entire global legal ramin supply.

False Permit Scam in Sarawak

In the town of Sibu in Sarawak, the traditional home of Malaysia’s ramin business, EIA/Telapak also obtained further shocking evidence of the scale of ramin laundering. One major ramin trader told investigators that about 30-40 per cent of the ramin currently being exported from Sarawak to Europe and elsewhere with CITES permits actually comes from Indonesia. This represents sales of timber and wood products worth more than \$4 million a year.³⁹

The trader explained how the ramin arrives from Indonesia to mills on the Sibu river and is rubber-stamped by the local authorities as originating in Malaysia. Local moulding manufacturers using these raw materials are allegedly only required to show that the timber



© Telapak/EIA

was purchased locally in order to obtain CITES Certificates of Origin for export. Customs records show that local companies are shipping more than 6000 cubic metres of ramin dowels and mouldings to the US alone each year.

Illegal Ramin Baby Furniture

Twins Furniture, a company based in the town of Kuantan in Peninsular Malaysia, is among the largest manufacturers and exporters of wooden baby cribs in the world. Half the cribs it produces are made from ramin. Twins’ products are on sale in major retail outlets around the world, especially in the US and Europe.⁴⁰

EIA/Telapak investigators visited Twins’ large factory complex in November 2003. The company owner told investigators that it regularly exports ramin cribs to Europe without CITES permits, and falsely advised that permits are not needed at import. Investigators also found illegal ramin from Indonesia at the company’s sawmill, which a worker said arrives regularly by barge at a nearby port.

Such ‘supplementing’ has enabled Twins to build ramin stocks of more than 11 000 cubic metres – almost one tenth of the annual legal world production. In fact it has so much ramin that the company has developed a lucrative sideline selling its surplus of unprocessed wood. In May 2004 one such shipment supplied by Twins was bought by a timber merchant in Japan.⁴¹

Above:
Illegal Indonesian ramin air-drying at Pasir Gudang port, Malaysia, 17th February 2004.

Almost twice as much illegal Indonesian ramin is being laundered through Pasir Gudang Port than is legally produced in the whole of Malaysia.



Malaysia's Vanishing Ramin Forests

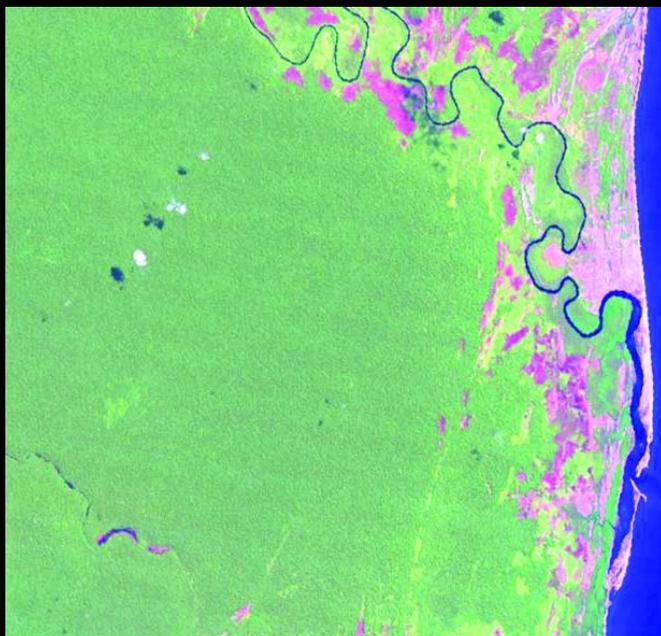
Only 190 000 hectares of ramin peat swamp forest remains in Peninsular Malaysia – less than a third of the 670 000 hectares which existed twenty years ago.⁴² Most of the remaining forest lies in a near-contiguous block along the coast in the state of Pahang. This area lies within the remit of a United Nations Development Programme Global Environment Facility (UNDP-GEF) funded \$6 million project aimed at furthering the conservation of Malaysia's remaining peat swamp forests.⁴³ It is home to many endangered species including tigers and Asian elephants.⁴⁴

While 45 per cent of Pahang's remaining peat-swamps are classified as 'state land' which is eventually destined to be cleared, the remainder – 90 000 hectares – is designated as 'Permanent Forest Reserve' (PFE).⁴⁵ This should mean that only sustainable logging is permitted, and the area must remain under forest. Yet a recent case has shown that where Malaysia's dwindling forests are concerned, the definition of 'permanent' is very flexible indeed.

During the last five years a giant swathe of this 'permanent' ramin forest 60 square kilometres in size has been systematically destroyed.⁴⁶ The huge oblong scar is clearly visible from space (see images below). In 1998 this tract of forest was controversially handed over to the United Malays National Organisation (UMNO), Malaysia's ruling party, for them to log and convert into an oil-palm plantation, despite its PFE status.⁴⁷ During the next two years companies working for UMNO stripped the area of thousands of valuable ramin trees. Between 1998 and 2000 ramin log production in Peninsular Malaysia almost doubled as a result, reversing a long term downward trend in allowable cuts.⁴⁸ Logging elsewhere in the peat swamp reserve is also reckoned to be unsustainable, and officials admit that even the minimal regulations governing harvesting are widely flouted.⁴⁹

Even ramin in National Parks in Malaysia is far from safe. The 11 000 hectare Loagan Bunut National Park in Sarawak is also one of the three areas covered by the UNDP-GEF programme.⁵⁰ Like Malaysia's other two peat-swamp parks, the area was logged for ramin long before it was gazetted, and as a result large trees are rare. The Malaysian Timber Council gives ramin density in Loagan Bunut as around one-tenth that of virgin forest, indicating that there are just 5000 ramin trees in the reserve.⁵¹ Despite legal protection, the remaining ramin stocks continue to be cut. In a single seizure at the end of 2003, local enforcement agents captured 3000 logs stolen from inside the park.⁵²

Before



After



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Above: Satellite photos of ramin forest in Malaysia, showing how one 60 square kilometre area of 'reserve' was recently cleared.



Woeful Response

Detailed evidence from EIA/Telapak's investigations was provided to the authorities in Indonesia and Malaysia. The findings were subsequently published in February 2004 in a damning report - *Profiting from Plunder: How Malaysia Smuggles Endangered Wood* - sparking worldwide attention and concern. At the CITES Standing Committee meeting the following month, serious concerns were expressed by a number of Parties and an investigation launched.⁵³

The Malaysian authorities made strenuous attempts to play down the report and criticise its findings, but EIA/Telapak's incriminating video evidence could not be refuted. In a meeting in Kuala Lumpur attended by members of the press, the Minister of Primary Industries admitted that illegal trade was occurring and committed to investigate.

Just two days later Malaysian enforcement officials entered Pasir Gudang port. They discovered 2317 cubic metres (1637 tonnes) of illegal ramin, which they quickly confirmed had originated in Indonesia and was not accompanied by CITES permits.⁵⁴ It was the largest ever haul of illegal CITES listed timber in Asia.

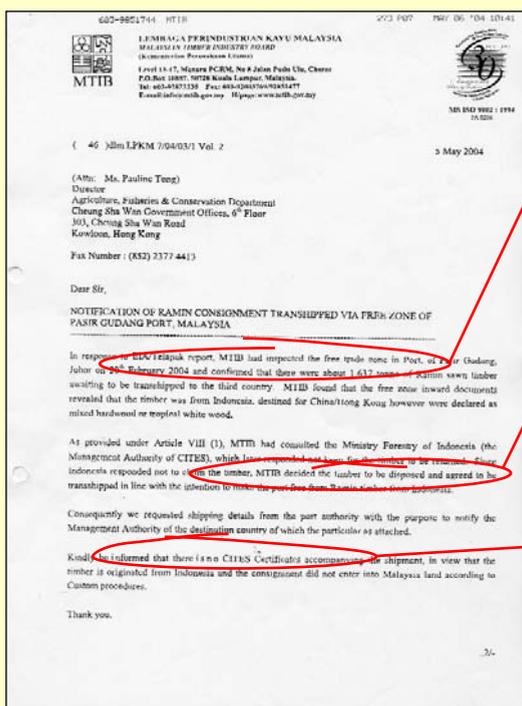
The Malaysian Timber Council were quick to hail the seizure as proof of the country's commitment to enforce,⁵⁵ but it soon became

clear that it was little more than a public relations stunt. During the next two months all the ramin was released without charge for onward shipment.⁵⁶ Though warnings were eventually faxed to the destination countries of Hong Kong, Taiwan and mainland China, they were not sent until all the shipments would have long since arrived.⁵⁷

Malaysia has claimed that they were forced to release the wood through a loophole in Malaysian law which means that CITES rules do not apply in Free Trade Zones.⁵⁸ Such an omission is contrary to CITES Resolution Conf 9.7, which specifically states that Parties should ensure that their CITES implementing legislation covers such areas.⁵⁹ It also fails to explain the delay in warning authorities in the destination countries.

No action has been taken against any of the Malaysian companies or officials detailed in the EIA/Telapak report. Malaysia's reservation against the listing of ramin parts and products continues to confuse traders and facilitate illegal trade, and the country's Free Trade Zones remain exempt from CITES controls. Neither has any action been taken by Indonesia to tackle the illegal exports and investigate the timber baron involved. With such a woefully inadequate response in both Indonesia and Malaysia, it is hardly surprising that the illegal ramin trade continues.

Below:
Belated fax sent by the Malaysian CITES Management Authority warning of the release of thousands of tonnes of illegal ramin destined for Hong Kong.



In response to EIA/Telapak report, MTIB had inspected the free trade zone in Port, of Pasir Gudang, Johor on 20th February 2004 and confirmed that there were about 1,637 tonne of Ramin sawn timber

MTIB decided the timber to be disposed and agreed to be transhipped

Kindly be informed that there is no CITES Certificates accompanying the shipment.



Experts are unanimous that ramin merits inclusion on CITES Appendix II.

The Case for Appendix II

Despite the broad success of the current Appendix III listing of ramin, the species continues to be threatened by illegal and unsustainable exploitation across its range. Malaysia's reservation against the listing of parts and products, coupled with widespread laundering, have served to undermine current CITES controls. Current levels of legal logging of the species are clearly unsustainable, and even ramin trees in protected areas are being felled.

Faced with the continued threat to the species from international trade, Indonesia has submitted a proposal to uplist ramin to Appendix II.⁶⁰ The uplisting has been sought on the basis that without strict regulation, harvesting for international trade will have a detrimental impact on the survival of the species in the long term. Experts from the World Conservation Union (IUCN),⁶¹ European Union member states,⁶² the CITES Secretariat,⁶³ and the wildlife trade monitoring network, TRAFFIC,⁶⁴ are unanimous in their agreement that the species merits inclusion on these grounds.

An Appendix II listing would raise the profile of ramin and bring increased resources and attention to control trade in the species than currently exist under the Appendix III regime.

This has been confirmed to EIA by customs officers in major consuming countries.⁶⁵ An Appendix II listing would also bring the full weight of CITES to bear on any Party failing to abide by the Convention.

Unlike Appendix III, an Appendix II listing would also require exporting countries to assess and ensure the sustainability of their ramin harvests, through non-detriment findings. All the available evidence shows that such additional regulatory measures are urgently needed.

While the case for uplisting ramin is clear, it should not be implied that Appendix III controls have failed. On the contrary, the experience of the listing of ramin on Appendix III has shown that given the crisis levels of illegal logging such listings can be a powerful emergency measure in tackling trade in illegally sourced timber. Though Appendix III listings are often poorly implemented and understood, this is only because many Parties fail to take them seriously. This must be addressed, and additional Appendix III listings of timber species should be urgently considered. CITES must not fail in its duty to do all it can to halt the scourge of illegal logging which is threatening the world's forests.

Below.
Peat swamp forest in Tanjung Puting National Park.



© Dave Curney/EIA/Telapak



The Importance of Processed Wood

The vast majority of international trade in ramin is in processed wood, while trade in logs, sawntimber, veneer sheets and plywood is limited.⁶⁶ For this reason, Indonesia included processed wood products (annotation #1) when the country listed ramin on Appendix III of CITES in 2001. The proposal by Indonesia to list ramin on Appendix II of CITES deliberately retains this annotation. Information collated by EIA/Telapak shows that this annotation is vital if an Appendix II listing is to be effective. Evidence from seizures under the current Appendix III listing also proves that CITES controls for processed ramin wood can be implemented and enforced.

Ramin logs spoil quickly, and are almost never shipped outside the countries of origin. Long-standing policies to encourage downstream processing in range states have also served to dramatically increase the proportion of trade of semi-finished and finished products. In 2000, the last full year during which ramin wood was permitted to be exported from Indonesia, 90 per cent by weight of exports were of semi-processed wood such as mouldings and dowels.⁶⁷ Though Malaysia only publishes figures for export of ramin as sawn wood, the country is also a major producer and exporter of moulded wood products. Malaysia has no less than 334 wood mouldings factories⁶⁸ and such items probably represent at least half of all ramin wood exported.

In the key markets for ramin wood, the pattern is even more striking. The US and Europe alone ultimately consume around two thirds of the world's ramin.⁶⁹ More than 95 per cent of this wood arrives in processed form.⁷⁰ Between August 2001 and March 2003, for instance, US import data records 540 shipments as including ramin wood.⁷¹ Only four - less than one per cent - were of sawntimber. The rest were processed products, including dowels, mouldings, picture frames, billiard cues, louvre doors and paint brushes.

Ramin trade figures collated from CITES annual reports by the UNEP World Conservation Monitoring Centre (WCMC) appear to contradict the above, with 95 per cent of shipments recorded as 'timber' or 'sawnwood'.⁷² But close analysis by EIA/Telapak of available source data reveals that the WCMC figures are dangerously misleading due to inadequate standard classifications. In 2001, for example, WCMC record that the US imported 765 cubic metres of 'sawn wood'. Yet CITES permits received by



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US Customs clearly show that this 765 cubic metres actually consisted of 15 shipments of ramin dowels and mouldings – processed wood.⁷³

The inclusion of all readily recognizable parts and products in the Appendix III listing has provided some new challenges to enforcement officials. But where political will has been shown these challenges have been overcome. Ramin wood is used in quite a limited range of wooden items and products, and each of these comes in a small range of species.⁷⁴ Slatted wood blinds, for example, are typically made only from either ramin or one other species – basswood – while ramin is the only light coloured wood used for the production of cues.⁷⁵ Armed with such basic knowledge, intelligent targeting has dramatically reduced the potential burden on customs officials. Combined with an extensive array of identification guides and assistance made available over recent years,⁷⁶ this has enabled Parties to successfully implement and enforce the listing for processed wood without the need for significant extra resources.

Successful seizures of processed ramin wood and ramin wood products have been made in a number of countries including the UK and USA.⁷⁷ Prosecutions have followed, and implementation of the listing for such items in source or manufacturing countries has also improved as a result.⁷⁸

Most importantly, given the nature of the trade and the existing Appendix III listing, an Appendix II uplisting with a more limited annotation than proposed would effectively reduce the current controls on trade. Such an action would be detrimental to the survival of the species in the wild, and would run contrary to the aims of CITES.

Above:
Ramin wood blinds on sale in London, UK, August 2001.

The vast majority of international trade in ramin is in processed wood.



Conclusions

- Rampant illegal logging driven by an unregulated international trade in stolen wood is rapidly destroying the world's forests. The international community has recognised the scale and importance of this problem and made repeated commitments to take urgent action.
- While CITES does not represent the only or ultimate answer to these problems, listings on CITES are currently the only legal mechanism by which importing countries can halt the flow of illegally sourced wood from endangered timber species.
- The listing of ramin on CITES Appendix III has shown that such listings can be a useful tool in empowering consuming countries to help tackle illegal logging and trade in stolen wood. Further listings are justified and should be supported.



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- Despite the success of the Appendix III listing, ramin continues to be threatened by illegal and unsustainable cutting and trade. Large quantities of illegal Indonesian ramin are being laundered through Malaysia.
- Ramin qualifies for inclusion on Appendix II of CITES and this would provide much needed additional protection to the species. Parties should therefore support the proposal by Indonesia to uplist ramin.
- Malaysian opposition to the Appendix II listing should be considered in light of the country's track record in deliberately undermining CITES controls on the species, and the reliance of the Malaysian timber industry on a continued supply of illegal ramin from Indonesia.
- The annotation to include all ramin parts and products is of critical importance to the effectiveness of an Appendix II listing. The current Appendix III listing has shown that implementation of such an annotation is possible. An Appendix II listing with a weaker annotation would reduce current CITES controls and be detrimental to the species.

Recommendations

All CITES Parties

- **Actively seek to make greater use of CITES to halt trade in illegally sourced timber and wood products, so protecting threatened tree species and critical forest habitat.**
- **Improve implementation and enforcement of CITES timber listings, individually and cooperatively.**
- **Support the uplisting of ramin to Appendix II of CITES, including the annotation to include all parts and derivatives.**

Range states

- **Urgently consider listing additional endangered timber species suffering from illegal logging and associated trade on CITES Appendix III.**

Consumer states

- **Support the inclusion of additional endangered timber species on Appendix III and encourage such listings by producer countries suffering from illegal logging.**



References

1. Royal Institute of International Affairs (RIIA), Controlling the International Trade in Illegally Logged Timber and Wood Products, Feb 2002
2. *ibid.*
3. Consultative Group on Indonesian Forestry (CGIF), Jakarta, Sept 1996
4. Jakarta Post, "Time to Get Realistic About the Forest Crisis", 17/1/03
5. Forest Watch Indonesia, as quoted in the Jakarta Post, 29th October 2003
6. Greenpeace, Against the Law: The G8 and the Illegal Timber Trade, 2000
7. Memorandum from the G8 Summit, Birmingham 1998
8. Report of the 6th Meeting of the Conference of the Parties to the Convention on Biological Diversity, April 2002
9. International Tropical Timber Council, Report of the 31st Meeting, November 2001
10. European Union, Forest Law Enforcement, Governance and Trade: Proposal for an Action Plan, May 2003
11. US State Department Press Release, Secretary of State Colin L. Powell To Launch The President's Initiative Against Illegal Logging, July 2003
12. Plan of Implementation of the World Summit on Sustainable Development (Revised) 23rd Sept 2002
13. Memoranda of Understanding (MoUs) were signed on the subject between the UK and Indonesia in April 2002, between Indonesia and China in December 2002, and between Indonesia and Japan in June 2003
14. EIA/Telapak, Timber Trafficking, 2001
15. IUCN Red List of Threatened Species
16. EIA/Telapak Indonesia, The Final Cut, 1999; EIA/Telapak, Final Cut Update, 2000; EIA/Telapak, Timber Trafficking, 2001
17. Anonymous pers comms. to EIA/Telapak, 2002-2004
18. Anon., field report of investigative visit to Riau, Sumatra, June 2003
19. EIA/Telapak, International Ramin Wood Trade – The Importance of Processed Wood, June 2004
20. Pers. comm., US Fish & Wildlife Service (USFWS), 2002; US Public Access to Court Electronic Records (PACER) electronic system, December 2003
21. Her Majesty's Customs and Excise, "Customs settles case involving importation of ramin wood", press release, Feb 2003; pers.comms., HMCE, 2002-2003
22. TRAFFIC SE Asia, Framing the Picture: An Assessment of Ramin Trade in Indonesia, Malaysia and Singapore, 2004; CoP13 Prop.50, Inclusion of *Gonystylus* spp. in Appendix II, with annotation #1
23. Pers. Comm., Japanese Ministry of Economy, Trade & Industry, 4th October 2001
24. Pers. Comm., U.S. Taipei Cultural and Economic Office, Washington D.C., USA, 17th August 2004
25. EIA/Telapak, confidential internal reports of field investigations and surveys, 2001-2004
26. EIA/Telapak, confidential internal report, 2004
27. Statistics Department of Malaysia, as reported in MTIB Journal Maskayu, 2001-2004
28. Report of the Malaysia-The Netherlands Ad-Hoc Expert Group on Forest Management, Jan 1996
29. United Nations Development Programme Global Environment Facility, Project of the Government of Malaysia MAL/99/G31: Conservation and Sustainable Use of Tropical Peat Swamp Forests and Associated Wetland Ecosystems, June 2000.
30. TRAFFIC SE Asia, 2004, op cit
31. Malaysian Timber Council, "The Malaysian Timber Council rejects the generalizations and grossly overstated claims made by the EIA and Telapak", briefing document, February 2004
32. Anon., Malaysia's peat swamp forests: a discussion paper, with particular reference to ramin, August 2001
33. Statistics Department of Malaysia, 2001-2004, op cit
34. TRAFFIC SE Asia, 2004, op cit
35. EIA/Telapak, confidential internal report of field investigation, Aug 2001; EIA/Telapak, confidential internal report of field investigation, Apr 2003; EIA/Telapak, confidential internal report of field investigation, Nov 2003
36. Borneo Bulletin, 21st September 2001; SCTV News Indonesia, August 2002; Batam Pos, 31st March 2003; Sarawak Tribune, 1st November 2003; MTC Press Release, 3rd March 2004; Utusan Malaysia, 13th August 2004
37. EIA/Telapak, Profiting from Plunder: How Malaysia Smuggles Endangered Wood, Feb 2004
38. Malaysian Timber Council, 2004, op cit
39. EIA/Telapak, Profiting from Plunder, 2004, op cit
40. EIA/Telapak, Profiting from Plunder, 2004, op cit
41. Pers. Comm., confidential, August 2004
42. Forest Research Institute of Malaysia, Rehabilitation of Logged-Over Peat Swamp Forests in Peninsular Malaysia, presentation to International Workshop on Integrated Management and Rehabilitation of Peatlands, February 2004
43. UNDP GEF, June 2000, op cit
44. *ibid.*
45. *ibid.*
46. Malaysiakini, "Satellite photos confirm widespread logging on Umno's land", 7/8/03
47. *ibid.*
48. TRAFFIC SE Asia, 2004, op cit
49. The Star, "Potential in peat swamp", 20/1/04; The Star "Save the peat forest", 24/7/04
50. UNDP GEF, June 2000, op cit
51. Malaysian Timber Council, 2004, op cit
52. The Star, "Big seizure of illegal logs in national park", 13/12/03
53. 50th Meeting of the Standing Committee to CITES, 15th-19th March 2004, Summary Report
54. Malaysian Timber Council, "Illegal Indonesian Ramin Crackdown", press release, 3rd March 2004; Malaysian Timber Industry Board (MTIB), faxes sent to CITES Management Authorities in Hong Kong, China & Taiwan, copied to EIA, 5th May 2004
55. Malaysian Timber Council, 3rd March 2004, op cit
56. Malaysian Timber Industry Board, 5th May 2004, op cit
57. Malaysian Timber Industry Board, 5th May 2004, op cit; EIA pers. comms. with CITES Authorities in Hong Kong, Beijing and Taipei, May-Aug 2004
58. Pers. comm., Secretary General, Ministry of Plantation Industries and Commodities, 18th May 2004
59. CITES Conf. Res. 9.7, Transit and transshipment
60. CoP13 Prop.50, Inclusion of *Gonystylus* spp. in Appendix II, with annotation #1
61. IUCN/TRAFFIC, Analyses of the Proposals to Amend the CITES Appendices, August 2004
62. Pers.com., UK CITES Plants Scientific Authority, 2003
63. CITES, Provisional Assessments by the Secretariat to Amend Appendices I and II at the 13th Meeting of the Conference of the Parties, 2004
64. TRAFFIC, Recommendations on the Proposals to Amend the CITES Appendices at the 13th Meeting of the Conference of the Parties, August 2004
65. Confidential pers.comms., 2003
66. EIA/Telapak, June 2004, op cit
67. BPS, Indonesian Export Statistics, published reports 1998-2001
68. Malaysian Timber Council, 2004, op cit
69. EIA/Telapak, June 2004, op cit
70. US Port Import-Export Reporting Service data, 2001-2004; CITES permits obtained from US Fish & Wildlife Service, July 2002; Pers. comm., UK Department of Environment, Food and Rural Affairs, 2003
71. Port Import-Export Reporting Service data, 2001-2004
72. UNEP-WCMC Wildlife trade on-line database
73. CITES permits obtained from US Fish & Wildlife Service, July 2002
74. EIA/Telapak, confidential internal reports of field investigations and surveys, 2001-2004
75. *ibid.*
76. eg Environment Canada, CITES Identification Guide – Tropical Woods: Guide to the Identification of Tropical Woods Controlled under the Convention on International Trade in Endangered Species of Wild Fauna and Flora, 2002
77. Pers. comm., US Fish & Wildlife Service (USFWS), 2002; Pers. comm., UK Department of Environment, Food and Rural Affairs, 2003; US Public Access to Court Electronic Records (PACER) electronic system, December 2003
78. EIA/Telapak, confidential internal reports of field investigations and surveys, 2001-2004



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