

State of Forestry in Namibia environmental implications

INARUSEB UNDERTAKES TO IMPROVE FOREST RESOURCE MANAGEMENT

'Misunderstanding' led to timber looting



SPOTLIGHT: A truck loaded with timber spotted after the deadline for harvesting has passed. PHOTO: FILE

Forestry ministry Alpheus Inaruseb claims there was a misunderstanding of laws that resulted in the illegal harvesting of large amounts of protected trees in the Kavango and Zambezi regions.

Popular Democratic Movement (PDM) MP Nico Smit asked Inaruseb why his ministry

CATHERINE SASMAN

The forestry minister says studies will be done to ensure well-informed programmes, while claiming that a misunderstanding of laws led to protected trees being cut down and shipped overseas.

istry has issued hundreds of harvesting permits without the requisite environmental clearance certificates (ECCs).

Inaruseb responded in the National Assembly that it was "not very clear" whether the harvesting licences or the ECCs come first.

He said when it was brought to the attention of the ministry that clearance certificates are required first, the issuing of harvesting licences were suspended on 26 November last year, while his ministry and the environment ministry came to an intermediate agreement to allow the continued transportation of the harvested timber to resume.

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Govt accepts blunder on timber harvest

• NGHINOMENWA ERASTUS

AGRICULTURE minister Alpheus Inaruseb says he does not know how much timber can be harvested sustainably in Namibia. He made these remarks last week in the National Assembly in response to earlier questions by Popular Democratic Movement member Nico Smit.

The minister also revealed that all timber harvested before 26 November 2018 was cut down without environmental clearance certificates.

He conceded that the government blundered by allowing timber harvests based on the management plan only, which is based on the Forest Act, without consulting the Environmental Management Act, which requires an environmental clearance certificate to be issued before logging takes place.

"When it was established that there was a need to have clearance certificates as per provisions of the Environmental Management Act of 2007, all the timber logging operations were immediately suspended," Inaruseb said.

He added that there was confusion between the ministries of agriculture and of environment on which should be handled first – the environmental clearance certificate, or the forestry permit. The lack of clarity led to farmers in the concerned regions harvesting timber without environmental clearance certificates.

The ministries only realised the blunder last year, and the ministry of agriculture suspended logging on 26 November 2018.

Inaruseb also said the government was not certain about the number of trees that could be cut down for commercial exploitation.

"The tree density varies from one farm to another, thus making it difficult to state with certainty the number of trees that could be harvested in the country," he said in his response.

He elaborated that the assessment on individual farms or community forests could not conclusively provide the number of trees which can be harvested sustainably.

"However, by the end of the ongoing resources assessment process, the ministry should be in a position to give a clear picture in terms of numbers," Inaruseb assured.

He said the decision to allow a tree to be harvested mostly depends on the size (diameter) of the tree, and its prevalence in the area.

Most of the trees being harvested in the Kavango and Zambezi regions, including the prized rosewood, take between 125 and 132 years to mature.

Inaruseb said although the ministry has implemented tree planting and forest conservation programmes, the lack of water in many parts of the country is an impediment to implementation.

He also told the NA that monitoring activities are limited by inadequate resources in terms of personnel and transport.

The minister disclosed that the government will soon declare forests in the Kavango West, Zambezi and Otjozondjupa regions state forests.

Smit called for the Directorate of Forestry to return to the environment ministry, since the agriculture ministry had failed to implement the Forestry Act, but Inaruseb said this can only be reversed when the president decides so, as he is the one mandated by the Constitution.

He gave an assurance that his ministry will not issue logging permits without verifying that there are adequate trees for harvesting in a particular area.

Inaruseb said the ministry will continue to strike a balance between conservation and the sustainable usage of forests for the benefit of citizens.

Last year's timber harvest suspension was not welcomed by some farmers, who accused the ministry of depriving them of a livelihood.

The move led to illegal logging, as truckloads of timber were still spotted heading to the coast, forcing the ministry to involve the police to fight the practice earlier this year.

The Namibian this year reported that the ministry of agriculture was flooded with applications to cut down more than 200 000 trees in five years, while more than 68 000 have already been felled.



NCE
Namibian Chamber of Environment

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Mr Percy Muka
Permanent Secretary
Ministry of Agriculture, Water & Forestry
Private Bag 13184
Windhoek

Our Ref: NCE 11/27/nmf/2

18th October 2018

Dear Mr Muka,

Re: **Issues of concern to the Forestry sector**

Dear Mr Muka, we are responding to your concerns about the deforestation in the Zambezi region, the extraction of timber and the apparent lack of action by the Directorate of Forestry and your Ministry. We have received and e-mailed our correspondence to your office. Having had no reply, we hand-delivered and e-mailed copies of the correspondence on two further occasions, and also posted a copy to your office. I enclose a copy of that correspondence again.

Our intention, as spelled out in the correspondence, was to meet with you and/or your staff and to discuss the constraints that you are experiencing with the intention of offering some assistance.

In the absence of any reply, we have continued to monitor the situation. We are deeply concerned by the lack of constraints of your Ministry to protect the woodland of the Zambezi region, and of the generally lackluster performance of your Directorate of Forestry in many areas that fall under its jurisdiction. I invite you to view this short video which is a time-lapse of satellite images of the eastern Zambezi region, showing the progression of deforestation: <https://www.youtube.com/watch?v=322213571266>.

We believe that we have reached the point where (a) an immediate moratorium is needed on all commercial woodland clearing and timber harvesting, (b) that an independent investigation and review of the performance, practices and public oversight of the forestry sector in your Ministry must be initiated, assessed against the forestry mission and objectives of your Ministry, and (c) that a "State of Namibia's Woodlands" be undertaken, with a focus on wood and cover loss over the past five years.

We would appreciate hearing about what your Ministry is doing to address and reverse the problem, and your response to our three suggested actions above.

Yours sincerely,

Dr Chris Brown (CEO)

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Mr Percy Muka
Permanent Secretary
Ministry of Agriculture, Water & Forestry
Private Bag 13184
Windhoek

Our Ref: NCE 11/27/nmf/2

22nd March 2019

Dear Mr Muka,

Position of the NCE of commercial hardwood timber exploitation in Namibia and associated deforestation

The Namibian Chamber of Environment, representing 64 Namibian environmental NGOs, wrote to you on 4 August 2017 and again on 18 October 2018, expressing our concerns regarding the commercial hardwood timber exploitation in north-eastern Namibia and explaining in some detail why this was of concern. The main purpose of our correspondence was to offer assistance – to provide support in whatever form was most appropriate to your Ministry and your Directorate of Forestry to help address the situation. We never received the courtesy of a reply.

The situation continued to deteriorate until the Minister of Environment and Tourism intervened. To date we see no strategy, plan or coherent response from your Ministry to address the problem. You seem to have no vision of how you plan to address the situation and, if you do, you have not shared this with the Namibian people, who are getting increasingly wary about the timber exploitation and the lack of response from you, your Minister and your Ministry.

We believe that you need to take a firm position on commercial timber harvesting in Namibia. Our woodlands are so marginal and slow growing (they are at the lowest rainfall extreme that such woodlands can grow), and these woodlands are so important for communities for their subsistence livelihoods, and these woodlands are so vital to mitigate climate change impacts, and they are so essential as wildlife and biodiversity habitats and corridors, that we believe that there should be a commercial logging and export of raw timber from Namibia.

Attached please find our full Position statement. This will be circulated widely to the media from next week. I hope that you will see the wisdom of coming out publicly to support and adopt this approach, which will allow Namibia to move forward on a pathway of sustainable woodland management, and calm the nation.

Yours sincerely,

Dr Chris Brown (CEO)

Co-Minister Alpheus Inaruseb Director Joseph Hallwa

Dr Chris Brown (CEO)

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Environmental issues of concern

- High levels of **uncontrolled, unmonitored and unregulated commercial timber extraction**, particularly very slow growing hardwoods, from north-eastern regions of Namibia.
- For almost four years the **DoF has been seemingly unwilling and/or unable to address this issue**, or to address the nation on the problem.
- Where timber harvesting is taking place under permit, in some cases the companies involved are not registered. Subcontracting is taking place (which we understand has not been approved and is unlawful), also these subcontractors include unregistered companies, or companies with lapsed registration. This all implies that there is **no due diligence and no on-the-ground checking**.
- **The State Forest in the Zambezi region is under clear threat.** We see no evidence of the DoF trying to protect the integrity of this important area. As one of only three State Forests in Namibia, and as it protects one of the few remaining areas of woodland in good ecological condition, we would have expected the DoF and MAWF to be at the forefront of protecting this important habitat.
- The Zambezi State Forest forms part of the corridor network of connectivity for the **KAZA programme**, linking Botswana, Namibia and Zambia via important wildlife and habitat migration routes. Any neutral observer could be forgiven for thinking that DoF and MAWF is outside the Namibian government's commitment to the KAZA initiative.
- After almost 30 years of Independence, the **DoF / MAWF has yet to pass legislation to proclaim the State Forests – there are none proclaimed.** This seems to demonstrate a total lack of commitment to safeguard these areas through legislation.



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Mr Joseph Hallwa
Director Forestry
Ministry of Agriculture, Water & Forestry
Private Bag 13184
Windhoek

July 2017
31 July 2017

Dear Mr Hallwa,

Issues of concern in the Forestry sector

The Namibian Chamber of Environment is an umbrella organisation representing the interests of the environmental NGO sector in this country. We currently have a membership of 52 organisations, which is over 90% of the recognised environmental NGOs in Namibia.

Over the past few months we have been receiving a growing number of concerns, enquiries and complaints about various aspects of the forestry sector in Namibia and its management and administration. This comes from our Members, from communities, from the private sector, from staff in other ministries and from members of your own staff. They are all deeply concerned about growing impacts on the woodlands of the country and about your Directorate's apparent lack of response to the situation. I would like to summarise the main areas of concern:

- There is currently a high level of timber extraction from the Zambezi region of the country. Some of this is taking place outside of approved Green Scheme areas, and in the State Forest. Your Directorate seems unwilling or unable to address this issue. This creates the impression that there is complicity with this apparent illegal timber extraction.
- Where timber harvesting is taking place under permit, in some cases the companies involved are not registered. Subcontracting is taking place (which we understand has not been approved and is unlawful), also these subcontractors include unregistered companies, or companies with lapsed registration. This all implies that there is no due diligence and no on-the-ground checking.
- Timber harvesting is also taking place in areas where an application has been received for a Tobacco plantation, but to our knowledge no Environmental Clearance Certificate has yet been issued, so the harvesting is illegal. Can your Directorate comment on this situation.
- The Environmental Impact Assessment for the Tobacco project in the Otjozharo/Mulilo area is an extremely weak document. We have examined it in detail. It is particularly weak on the

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Mr Percy Mwa
Permitting
Ministry of Agriculture, Water & Forestry
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Our Ref: NCE/13/2/mawf/1

4th August, 2017

Dear Mr Mwa,

Issues of concern in the Forestry sector

The Namibian Chamber of Environment is an umbrella organisation representing the interests of the environmental NGO sector in this country. We currently have a membership of 52 organisations, which is over 90% of the recognised environmental NGOs in Namibia.

Over the past few months we have received a growing number of concerns, enquiries and complaints about various aspects of the forestry sector in Namibia and its management and administration. This comes from our Members, from communities, from the private sector, from staff in other ministries and from members of your own staff. They are all deeply concerned about growing impacts on the woodlands of the country and about your Directorate of Forestry's apparent lack of capacity to respond adequately to the situation. In this context, I would like to request an urgent meeting to discuss the constraints that you face and to explore whether it would be possible for the non-governmental sector, including the business community, to provide assistance to DoF and your Ministry to turn the current situation around. In anticipation of a meeting, I would like to summarise the main areas of concern:

- There is currently a high level of timber extraction, particularly very slow growing hardwoods, from the northern and north-eastern regions of Namibia, particularly the Zambezi region at the moment, which amounts to commercial harvesting. Some of this is taking place outside of approved Green Scheme areas, and in the State Forest. The DoF seems unwilling or unable to address this issue. This creates the impression that there is complicity with this allegedly illegal timber extraction.
- Where timber harvesting is taking place under permit, in some cases the companies involved are not registered. Subcontracting is taking place (which we understand has not been approved and is unlawful), also these subcontractors include unregistered companies, or companies with lapsed registration. This all implies that there is no due diligence and no on-the-ground checking.

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See / mail / times
delivered / times
no response, no
acknowledgement

Environmental issues of concern continued ...

- **Tourism is also being directly threatened by deforestation.** The Travel & Tourism Competitiveness Report 2017 put out by the World Economic Forum downgrades Namibia's competitive tourism placing in the world, specifically because of high levels of deforestation, reflecting to the world that we are mismanaging our woodlands. Sustainable management practices are of significance to an increasingly environmentally literate traveling public, and the way that the forestry sector in Namibia is currently being managed is a threat to the future wellbeing and growth of tourism in this country.
- **There seems to be no ongoing monitoring of rates of deforestation in Namibia,** so these statistics are not brought to the attention of our scientists, land managers, traditional authorities, policy-makers, and the general public. Rates of deforestation and loss of critical hardwood trees would seem to be key national indicators that the DoF should be monitoring on an ongoing basis, and reporting.
- The recent transit and export of timber through Namibian ports, harvested both in Namibia and from neighbouring countries, seems to be poorly regulated and administered. Much of this seems to be illegal timber. As such, it creates a bad international image of Namibia, suggesting that we cannot impose the rule of law. **There are also concerns that many aspects of the timber industry are highly corrupt.** This tarnishes all aspects of Namibia and the way we manage our natural resources, but it particularly tarnishes government, whose task it is to enforce legislation.
- Where permits have been issued, **the price paid for legitimately harvested timber seems to be ridiculously low compared to its actual value on the open market.** This suggests that we are not realising the true value of our natural resources through either ignorance or neglect, or there is complicity and defrauding of national assets.

Environmental issues of concern continued ...

- **The illegal timber export “industry” – the commercial “driver” behind the timber harvesting - seems to be led largely by foreign Asian interests.**
- **What is happening in the illegal timber sector has strong parallels to wildlife crime.** The international criminal syndicates driving wildlife crime are also linked to drugs, human and arms trafficking, etc. The difference is that the Ministry of Environment and Tourism is out there, fighting against these crimes, apprehending suspects, laying charges and ensuring that perpetrators face the full force of the law. DoF and MAWF, by contrast, seem to be disinterested spectators, watching it happen but doing nothing – not even making a statement (until last month) in response to all the public outcry.
- Large areas of deciduous woodland have already been lost in Namibia. The situation is no-where more serious than along our large rivers, where riparian woodland and forest has been destroyed. **We see no evidence of the DoF implementing effective projects and programmes to reforest these areas** using appropriate local indigenous tree species, and involving local communities to improve the situation.
- **The loss of ecosystem services because of deforestation is significant**, including the loss of wild food plants, medicinal plants, plant products used for household implements, as well as the role trees play in the stabilisation of river banks, prevention of soil erosion, provision of habitat for other plants and animals, etc.
- Because of the lack of data on deforestation (because there is no national monitoring), the lack of reforestation programmes, the lack of broad engagement with communities on this issue (even in community forests the general awareness of community members is low), **there is little political awareness and engagement on the importance of woodlands in Namibia.** As a result, few politicians are speaking out about the dangers of deforestation and the need to protect and reforest our country.

Why is deforestation of concern?

- Woodlands provide **ecosystem services** to people – both direct and indirect
- They provide **habitat** to a wide range of plant and animal species
- They protect **soils**
- They enhance **water penetration**
- Woodlands provide vital **corridors and connectivity** across landscapes
- Woodlands help **moderate climate**, which is particularly important at this time as we face the impacts of climate change
- They provide a landscape that is **attractive to tourists**, with tourism currently being the second-most important component of our economy and the only sector currently showing economic growth
- And just last week new research showed that if all countries worked together to replant trees, these **trees could absorb $\frac{3}{4}$ of all the CO₂ produced since the start of the industrial revolution – the single most effective solution that is low-tech and accessible to every nation on earth – including Namibia**

Recommendations

- **There should be NO commercial harvesting of timber unless:**
 - ✓ There has been a thorough, transparent and verifiable resource assessment to determine the **sustainable harvest**; and
 - ✓ All harvested timber must be used for **significant value addition in Namibia** (i.e. as furniture or other goods). Raw timber (including round and squared logs and planks) should not be allowed to be exported.
- The woodlands in the north east should be **managed and protected primarily for local subsistence use**. Thus local communities should be permitted to use woodlands on a sustainable, small scale basis to support local livelihoods. Any trade from local use (craft, furniture) should be for finished products, not raw timber.
- **The Zambezi / Caprivi State Forest** and other woodlands identified as critical wildlife corridors within the Kavango-Zambezi (KAZA) Trans-frontier Conservation Area **must be strictly protected, with no clearing allowed for any purposes**.
- Land allocated for farming in woodland ecosystems must only be permitted for a maximum of **5-hectare plots at a time, for specific agricultural projects**. Farmers wishing to expand their plots must provide **evidence of commercial viability of the plots they already farm**. If farming is found to be unviable, no further plots should be granted. **This will prevent agricultural “projects” being used as smokescreens to justify clearing of woodlands solely for timber harvesting with no real intention of carrying out any agriculture. This will stop the deceit.**

Recommendations continued ...

- **DoF and MAWF should work hand-in-hand with MET on law enforcement** and establish seamless policy approaches for woodland management.
- **DoF should, as soon as politically appropriate, migrate to the MET** so that the above can be better implemented and so that community conservancies and forests can be properly integrated.
- An appropriate, cost efficient and effective **woodland cover monitoring system should be established** or commissioned to ensure that technicians and politicians are better informed.
- An effective, participatory nation-wide **reforestation programme should be established**, with a national budget and provision for international support, e.g. through the Green Climate Fund.
- **The importance of woodlands in Namibia require far more political support and engagement. Politicians thus need to be kept informed.**

With Regards to the Tobacco Project in Zambezi Region:

This project was entirely deceitful and should not have been approved, for the following reasons:

- a) The timber and woodland was largely cleared ahead of receiving approval via an environmental clearance certificate;
- b) There was cleared and abandoned land in the area that should have been used in preference to opening up new land;
- c) A previous tobacco farming attempt in that area some years ago failed because the conditions are unfavourable for this crop which would consume a vast amount of Namibia's water allocation from the Zambezi;
- d) The proponents targeted the area with the best timber for the express but hidden purpose of timber abstraction and export – the farming of tobacco and other crops is a smoke screen.



We hope that this illegal logging, transport and export of raw timber that strips Namibia of its natural resources at great ecological, social and economic cost for virtually no benefit, is now a thing of the past.

THANK YOU