

The Prime Minister,
Head of Government,
Yaoundé

28 April 2020

Your Excellency,

Re: Proposal for the suspension of the classification process of two Forest Management Units in the Ebo forest and initiation of a more inclusive land use planning process

We are writing to express our concern, following the publication on 9 March 2020, of two public notices classifying the Ebo forest in the Littoral Region in the private domain of the State as two Forest Management Units (FMUs). This classification process has been particularly rapid, as the public notices were immediately followed by a series of sensitization meetings held in Yabassi and Yingui from 10 March 2020, with the aim to educate local communities on the potential benefits they would get from the creation of the FMUs, as well as perceived benefits for the national economy. Members of our team attended some of these meetings, and expressed our concerns and suggestions which we now expound in this correspondence.

In order to balance many land uses in this environmentally and socially sensitive area we recommend that the process for classifying two FMUs is suspended. The 2011 Law on Land Use Planning sets out the Local Land Use and Sustainable Development Planning process – for which a methodology is currently being developed by the Ministry of Economy, Planning and Regional Development (MINEPAT) for use in situations where multiple stakeholders need to be involved, as is the case for Ebo forest. We hereby set out a proposal to follow this government-mandated process to determine the future of the Ebo region.

For several years, we have enthusiastically supported the efforts of local communities seeking an appropriate legal status and options for the sustainable long-term management of the Ebo forest, because of the significance of the forest and the resources therein for their livelihoods, and their culture. The Ministry of Forestry and Wildlife (MINFOP) warmly welcomed this approach, by proposing, and starting the process of gazettment of this forest as a national park in 2006. MINFOP's interest is also evidenced by many correspondences, and publications.

While we acknowledge the need for the State to increase revenue through the sustainable exploitation of its natural resources, we underline that the change of plan to instead log the Ebo forest implies a number of impacts for the forest, neighboring communities and implementation of Cameroon's international commitments on climate and biodiversity protection. The revision of Cameroon's Intended Nationally Determined Contribution (main compass of our action to reduce greenhouse gas emissions) and the forthcoming Conference of Parties (COP) to the Convention on Biodiversity (CBD) and the Climate COP26 are both opportunities for Cameroon to reaffirm its role as a flagship country in the Congo Basin.

We recognize that insufficient funding for the long-term management of Ebo forest has been forthcoming, but we sincerely believe that significant new funding is available for actions to reduce greenhouse gas emissions and protect biodiversity in the sub-region. In 2019, Gabon signed a results-based payment agreement of US\$150 million with the Central African Forest Initiative (CAFI) to support its transition to a green economy. The Government of Cameroon is currently drafting a National Investment Plan to launch discussions with CAFI on its national vision and objectives to promote sustainable land use. Our proposal for Ebo would strengthen coherence between Cameroon's actions and its international commitments, and open new venues of dialogue with and support from the State's technical and financial partners.

As researchers, students, conservationists and development agents, we hereby submit to your high attention our proposal to suspend the process of creating these two FMUs. We urge the Government of Cameroon to initiate an inclusive multi-sectoral land use planning process to explore all land use options, as set out in the Local Land Use and Sustainable Development Planning process envisaged in the 2011 Law on Land Use Planning (Republic of Cameroon 2011: Loi N° 2011/008 du 06 Mai 2011 d'orientation pour l'aménagement et le développement durable du territoire au Cameroun), following the methodology that is currently being developed by MINEPAT (MINEPAT 2019) for use in situations where multiple stakeholders need to be involved in participatory land use planning process, in this case all stakeholders in council areas around the Ebo forest.

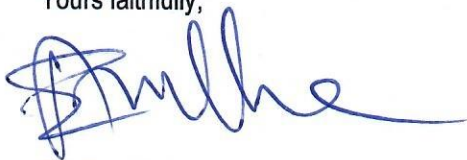
The result of such a process would be a series of spatially explicit maps indicating zones for sustainable exploitation of land and forest resources for the benefit of council and national treasuries, community resource use maps showing use of land for farming, non-timber forest products and important historic and cultural sites, and maps showing areas important for conservation. These maps, supported by analyses of the social, environmental and economic impacts of land use options would form the basis of an enlarged discussion about the constraints and advantages of each option and inform a series of local land use plans that would reconcile the interests of all stakeholders for the long term. These council-level plans would seek a consensus that meets the socio-economic aspirations and cultural sensitivities of local communities, the economic development priorities of the Government, and respond to the best advice from the scientific community, thereby preserving the integrity of the forest, its exceptional biodiversity and the immense services it provides to local communities.

This planning process will require leadership and resources from the Government. We are confident that Cameroon's technical and financial partners will offer funding and technical support. We understand that MINEPAT is currently elaborating and testing the abovementioned methodology for local land use and sustainable development planning. We humbly suggest that the Ebo landscape be used as a pilot area for the new methodology.

We remain willing to participate in further discussions, and to contribute to the search for long-lasting solutions. Conservation concessions or other innovations, whereby the state receives annual royalties for the public treasury while the forest and its resources are intact and accessible for low impact local community uses could be one of the options for the Ebo forest. We are convinced that with a little more time for dialogue during an enlarged land use planning process, more refined solutions could be identified.

We remaining at your disposal for any further information, and sincerely hope that our request will be considered.

Yours faithfully,



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CC:

**Presidency of the Republic
Ministry of Forestry and Wildlife
Ministry of Economy, Planning and Regional Development**

APPENDIX

Below we present a summary of the biological and cultural values of the forest and some copies of publications in scientific journals of our research in the Ebo forest.

1. Reasons why the Ebo forest is unique

The Ebo forest is the most functionally intact ecosystem in the Gulf of Guinea biodiversity hotspot (Morgan et al 2011) and most of it is recognized as part of an [Intact Forest Landscape](#). According to BirdLife International, it is also the largest forest area in the Yabassi Key Biodiversity Area (Birdlife 2020). The Ebo forest is home to:

- A population of gorillas (*Gorilla gorilla*) of unknown taxonomy which could potentially be the fifth subspecies in the world; and importantly, the third subspecies for Cameroon (Morgan et al 2003).
 - Critically Endangered on the IUCN Red List; Class A in the Cameroon Wildlife Law.
- The largest population of Nigeria-Cameroon chimpanzees (*Pan troglodytes ellioti*) (Morgan et al 2011).
 - Endangered on the IUCN Red List; Class A in the Cameroon Wildlife Law.
- The only population of chimpanzees in the world with both the ability to crack nuts and extract termites with tools (Morgan and Abwe 2006).
 - Currently proposed as a protected species by the CMS COP13.
- The largest remaining population of drills (*Mandrillus leucophaeus*) in the world (Morgan et al 2013).
 - Endangered on the IUCN Red List; Class A in the Cameroon Wildlife Law.
- Forest elephants (*Loxodonta africana cyclotis*).
 - Endangered on the IUCN Red List; Class A in the Cameroon Wildlife Law.
- One of the two remaining populations of Preuss's red colobus (*Piliocolobus preussi*) (Morgan et al 2012).
 - Critically endangered on the IUCN Red List; Class A in the Cameroon Wildlife Law.
- At least 12 new plant species for science, discovered and published, all of them are endangered species in the world and most are endemic to the Ebo forest (for example: *Talbotiella ebo*, *Ardisia*

ebo, *Crateranthus cameroonensis*, *Palisota ebo*, *Gilbertiodendron ebo*, *Inversodicraea ebo*, *Kupeantha ebo*) (Cheek et al 2018).

- An intact and very diverse bird community, some of which are of conservation significance and attract the curiosity of birdwatchers, notably the grey parrot (*Psittacus erithacus*) various hornbill species, crowned eagle, amongst others (Whytock & Morgan 2010).
 - Endangered on the IUCN Red List; Class A in the Cameroon Wildlife Law.

In addition to this rich biodiversity, the Ebo forest is home to more than 40 communities which give this space and the resources it contains considerable cultural, customary and economic importance. The populations living near Ebo depend on resources for their subsistence (non-timber forest products for food and traditional medicine). The forest was inhabited before Cameroon's independence in 1960 and it is still considered customary land by the many neighboring communities. The close relatives of many patriarchs and matriarchs from these communities are buried inside the Ebo forest.

The exceptional richness of the Ebo forest, which has been kept intact to this day thanks to the combined efforts of local communities and the Government, has always aroused exceptional interest from research institutions of national and international renown. The work carried out by these institutions enhances the biodiversity of our country every day with the frequent discovery of new species of animals and plants. Cameroonian universities, including that of Douala, also conduct numerous research projects in Ebo and plan to make the Ebo forest a natural laboratory for training young Cameroonian researchers.

2. Such wealth deserves better protection

Ebo forest's natural and cultural richness as described above explains why the Government originally wanted to gazette the forest as a national park. Local communities and traditional authorities, as well as civil society organizations have supported the proposal for giving Ebo forest a legal status that secures these resources, and their access to use them sustainably for the long term. It is indeed the only place in our country for which the Government has received formal and repeated requests from local communities for its protection under an appropriate legal status that secures these resources, and their access to them for the long term.

The Government therefore decided in 2006 to initiate the process for the creation of the Ebo National Park, and numerous official letters from successive ministers in charge of forests and wildlife have since confirmed this desire for its protection.

Recent estimates show that the Ebo forest stores about 35 million tonnes of carbon (Global Forest Watch 2020), which constitutes a vital carbon pool whose protection could be supported by the international market. This carbon stock would be significantly impacted by opening the forest up to logging.

Ensuring better protection of the Ebo forest will allow the State to respect its international commitments in terms of reducing greenhouse gas emissions, protecting biodiversity and improving the living conditions of neighboring communities.

3. Government announcement of its desire to create two Forest Management Units

Two orders of the Minister of Forestry and Wildlife signed on 4 February 2020 and made public on 9 March 2020 propose the classification of two forest management units (FMU 07-005 and FMU 07-006) to replace the project to create the Ebo National Park. These two FMUs would be used for timber exploitation. Despite the precautions which can be taken, logging operations would cause a significant disturbance to animal and plant biodiversity, and a degradation of this exceptional ecosystem as well as opening it up to other pressures such as poaching and bushmeat trafficking.

Transforming the Ebo forest into FMUs will send a worrying signal to partners of the State (local communities, scientific community, and the international community) especially during this critical year for the protection of biodiversity worldwide, and the next Conference of Parties (COP26) of the United Nations Framework Convention on Climate Change (postponed now until early 2021), because the contribution of Cameroon remains decisive for the process of revising strategies to protect the world's biodiversity.

4. What next?

After careful consideration, we recommend the following course of action to:

- Suspend the current process of creating the two FMUs,
- Engage in an inclusive and transparent local land use planning process following the methodology being developed by MINEPAT, with leadership and financial and technical support from Government and its multinational partners to explore and find a consensus on the best options for the sustainable use of land and natural resources in and around the Ebo forest,
- Consider sustainable alternatives to secure and enhance the management the Ebo forest, including the creation of a protected area or an innovative conservation concession, co-managed by the State and local communities, financed by a combination of sustainable uses, international support for biodiversity conservation and potentially the sale of certifiable carbon credits on the carbon market. These options could bring in enough income to contribute to state revenues while ensuring the socio-economic well-being of neighboring communities and the fight against climate change without damaging biodiversity.

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