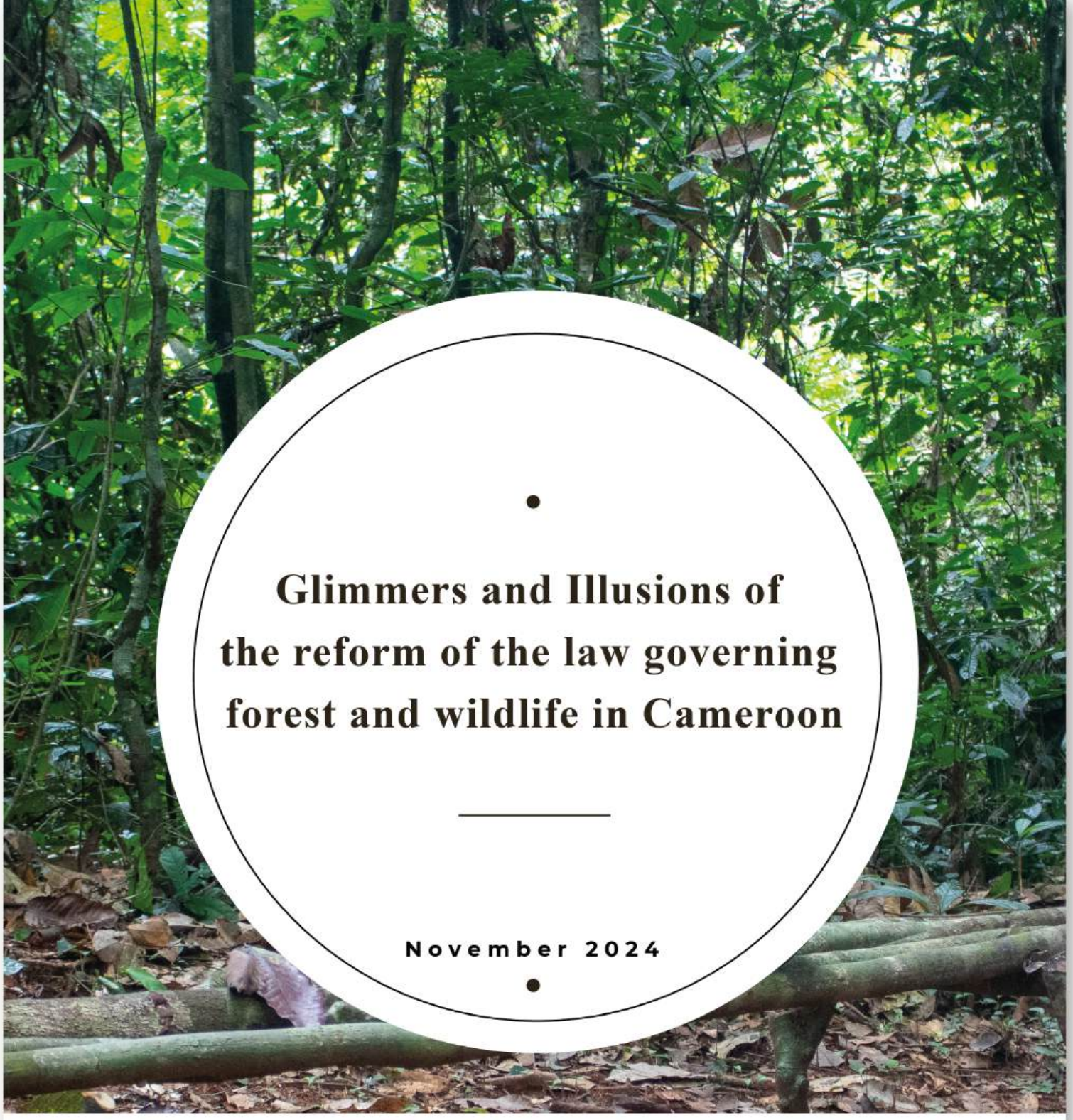

Glimmers and Illusions of the reform of the law governing forest and wildlife in Cameroon

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Analysis note

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SUMMARY

LIST OF ABBREVIATIONS

al.:	paragraph
NA:	National Assembly
art.:	article
DTC:	decentralized territorial community
CTL	: Community Tenure Lawyer
COMIFAC:	Central African Forests Commission
FAO:	Food and Agriculture Organization of the United Nations
APED:	Support for Environmental Protection and Development
CeDLA:	Center for Alternative Local Development
CERAD:	Center for Research and Action for Sustainable Development in Central Africa
ECODEV:	Ecosystem and Development
FLAG:	Field Legality Advisory Group
GDA:	Green Development Advocates
MINFOF:	Ministry of Forests and Wildlife
CSO:	Civil society organizations
IPLC:	Indigenous peoples and local communities
REPAIR:	Network of parliamentarians for the sustainable management of forest ecosystems in Central Africa
SAILD:	Support Service for Local Development Initiatives

1. Introduction

The reform of the forest and wildlife regime was initiated in Cameroon since 2008 by decision No. 0941/D/MINFOF/SG/DF/SDAFF of September 2, 2008 to revise Law No. 94/01 of January 20, 1994, which was already 30 years old. Numerous consultations and discussions were conducted for this purpose within civil society and other stakeholders in forest and wildlife governance. The resulting draft law No. 2058/PJL/AN on the forest and wildlife regime was submitted for consideration to Parliament, that is, to the National Assembly and the Senate. The production and trade commission of the National Assembly would have received the draft of this bill on June 20, 2024 and heard by the Minister of Forests and Wildlife on June 22, 2024.[1] Following its adoption by Parliament, the bill was promulgated on July 24, 2024, bringing the new forest and wildlife regime into force.

A consortium of civil society organizations from the forests, environment and human rights sector (APED, CeDLA, CERAD, ECODEV, FLAG, GDA, SAILD) closely monitored the process leading up to the promulgation of law N° 2024/008 of July 24, 2024 on the forest and wildlife regime, through a critical reading of the bill, the substance of which was submitted to parliamentarians. It highlighted the text's innovations and weaknesses, making it a mixture of glimmers of hope in view of the salutary developments it enshrines, and lures in view of the pitfalls identified. However, the recommendations made by the consortium of organizations have not been taken into account. With a view to enlightening the general public on the innovations of the new forest and wildlife regime, while drawing the attention of the Ministry of Forests and Wildlife and other stakeholders in the management of these resources to the weaknesses identified, the present analysis note has been drafted. It reports on the reflections of the above-mentioned consortium of civil society organizations and focuses on the working methodology used (2), the major innovations (3) and the perfectible aspects (4) of the aforementioned law, before formulating recommendations (5).

2. Methodology

The working approach used for the development of this document was participatory and consisted of two main moments, namely an analysis phase and an influential phase.

2.1. Analysis phase

Regarding the analytical work, a workshop was organized on June 24, 2024 at the Félidac Hotel in Yaoundé to mobilize civil society organizations (CSOs) from the forest, environment and human rights sector as well as experts to review the draft law. The consortium of CSOs (GDA, SAILD, APED, CeDLA, CERAD, ECODEV, FLAG) and experts brought together for this purpose had to examine the draft law article by article. This made it possible to identify the major problems, advances and limitations of the text on the management of the forest and wildlife sector with an emphasis on the rights and interests of Indigenous Populations and

1 Ref. Cameroon Tribune No. 13131/9330 of June 26, 2024, p.6.

Local Communities (IPLC). Concrete proposals for reformulations were made on this basis (see attached table). On June 25, a small working group of lawyers met in the GDA offices to draft an analytical summary of the proposals made during the workshop in order to influence the improvement of the content of the text submitted to parliamentarians.

Photo1: ***Workshop to analyze draft law No. 2058/PJL/AN on the forest and wildlife regime by CSOs from the forest, environment and human rights sector and various experts***

2.2. Influence actions

The actions taken to influence an improvement of the text to be adopted were carried out towards the parliamentarians who were to vote on it. They consisted in particular, through lobbying, in sending the results of the analyses carried out to parliamentarians from both the governing majority and the opposition. Similarly, through the Network of Parliamentarians for the Sustainable Management of Forest Ecosystems in Central Africa (REPAR), a working session was organized on June 26, 2024 at the Hôtel des Députés in Yaoundé with the members of the Senate Production and Exchange Commission and some deputies to improve their understanding of the bill and present them with the proposals for improvements and amendments formulated by the consortium of experts and CSOs prior to MINFOF's appearance before the aforementioned Senate committee. A press conference was then organized on June 28 to present to the public the issues of the current reform as well as its progress and limitations with an emphasis on the rights and interests of indigenous populations and local communities.

Photo2:Meeting to present to parliamentarians the analyses of civil society on draft law No. 2058/PJL/AN

3. Glimmers of forest and wildlife reform

Civil Society recognizes and welcomes the innovations perceived in the draft law analyzed, the most striking of which are generally: the exclusion of fishing from its object[2], its restriction to forest and wildlife (art. 1); and the extension of the scope to include monitoring of forest cover, restoration of forest landscapes and degraded lands, development and renewal of forest and wildlife resources, combating deforestation and forest degradation, legality, traceability of forest/wildlife products[3]. More specifically, we can mention :

2 See article 1 of law No. 94/01 of January 20, 1994.
3 See article 1, paragraph 2 of the text.

3.1. Increased supervision of sustainable forest and wildlife management

The analysis revealed:

- Ban on the export of logs[4];
- The requirement for logs to be processed entirely by local industry[5];
- The obligation to recover waste from wood processing units[6];
- Formalization of the obligation to recover waste from forestry operations[7];
- A significant advance in forest decentralization with the creation of regional forests[8] (art. 29);
- The creation of marine protected areas[9];
- The establishment of compensation for victims of human-wildlife conflicts[10];
- Ex-officio land registration of permanent forests[11];
- The system of incentives for private investment (Public Private Partnership, establishment of local wood processing units, recognition of the profession of forest products trader);
- Capping of maximum areas granted to operators[12].

3.2. **Recognition of certain rights of communities and consideration of environmental and ecological aspects**

The analysis allowed us to perceive:

- **Recognition of certain territories and rights for the benefit of local communities:**

This is noticeable with the formalization of areas of hunting interest with community management.[13], the recreation of community protected areas[14]and community hunting territories[15], the consecration of ritual hunting[16];

- **Taking into account environmental and ecological aspects:**

Which translates into incentives for reforestation and forest restoration[17],the recognition of the economic, fiscal, ecological, environmental, social and cultural damage suffered by communities[18], taking into account genetic resources[19]and ecosystem services[20]and the promotion of ecotourism[21] ;

4 See article 97 paragraph 2 of the text.
5 See article 97 paragraph 1 of the text.
6 See article 100 paragraph 1 of the text.
7 See article 61 paragraph 7 of the text.
8 See article 29 of the text.
9 See article 34 of the text.
10 Cf. article 117 of the text.
11 See article 24 paragraph 2 of the text.
12 Ref. article 67 paragraph 1 & 2, article 75 paragraph 1 of the text.
13 See article 49 of the text.
14 See article 33 of the text.
15 See article 45 of the text.
16 See article 120 paragraph 3 & 4 of the text.
17 See articles 91 & 96 of the text.
18 See article 180 paragraph 2 of the text.
19 See article 15 of the text.
20 See articles 86 & 92 of the text.
21 Ref. articles 133 paragraph 1, 134 & 135.

3.3. Improving the framework for managing forest and wildlife disputes and the severity of sanctions

The analysis allowed us to perceive:

- **The consecration of a single professional oath for civil servants in categories A and B:**

One of the practical difficulties in managing disputes by water and forestry officers is generally the availability of sworn judicial police officers with special competence. Indeed, the long delays and practical organisational procedures for taking the oath did not always make it easy for non-sworn officers to carry out certain judicial police acts. Thus, Article 155 represents a solution to this problem because the said officers will all take a single professional oath which will allow them to carry out judicial police acts regardless of their place of assignment. The same article provides for an oath of office for C and D civil servants.

- **A more dissuasive sanction regime against forest and wildlife crime**

This is made visible by the exclusion of the transaction for certain offences[22] the increase in the number of offences, the increase in cases of aggravating circumstances or even the criminalisation of certain offences.

4. Forest and wildlife reform lures

Despite these considerable advances, the text still contains problems and gray areas that Civil Society has noted, including:

4.1. Incomplete definitions of concepts

Definitions present in the text do not align with internationally recognized standards while it aims to make the necessary adjustments, and is part of the need to align with the international commitments made by Cameroon.[23]**.**This is how the central terms of the text (forests, participation) are not aligned with the international standards of the FAO with regard to forests and of COMIFAC with regard to participation. At the same time, essential terms such as indigenous populations are paradoxically absent from the concepts defined in the text. They are confused in the definition of riparian communities which contains the concepts of local populations and indigenous populations while these two terms are not themselves defined in the text. All of this contributes to maintaining the vagueness of concepts which have already been clarified at the level of COMIFAC of which Cameroon is a member. This is especially characteristic of the failure to take into account the specific case of indigenous populations in the UN sense of the term in the reform. Furthermore, it is a regression compared to Law No. 94/01 of 20 January 1994, Article 26, paragraph 1 of which specifically mentioned indigenous populations, while its equivalent in the reform only mentions riverside communities.[24]. Generally, other terms deserve to have less vague definitions (farming, agroforestry).

22 See article 157 paragraph 8 of the text.
23 Ref. Interview with Jules Doret NDONGO, Minister of Forests and Wildlife in Cameroon Tribune No. 13131/9330 of June 26, 2024, p.7.
24 Ref. article 25 paragraph 1 of draft law No. 2058/PJL/AN and law No. 2024/008 of July 24, 2024.

4.2. Exercise of the diluted participation right

Participatory management of forest and wildlife resources is set out as a principle in the document and seen as a major step forward in the explanatory memorandum. However, the definition proposed for this purpose is not consistent with the principle of participation, in that it leaves it to the forest manager to implement it. Similarly, several provisions tend to dilute the exercise of the right to participation, first by subordinating it to the sole will of the administration, and then by not clearly clarifying its framework for exercise by all stakeholders, in particular civil society, local communities and indigenous populations. Article 14 is the symbol of this state of affairs. It relegates local communities to the rank of collaborators in the protection of forest and wildlife heritage, whereas in practice they are the major players; and does not explicitly mention the other stakeholders who act in this context on a daily basis, such as civil society organisations. It would therefore be important to devote and regulate activities such as participatory mapping and independent observation of forests which are realities in Cameroon today. Moreover, how can we conceive of the omission of co-management agreements for protected areas (MoU) in the text like the one signed between MINFOF and ASBABUK, when we know that this is a real method of participation of indigenous populations in the sustainable management of wildlife resources?

4.3. Relaxation of the terms of declassification of forests in the event of public utility

Forest conversion is addressed in the text through classification and declassification operations. The CSOs note in particular a strong threat to the integrity of forests through the relaxation of the declassification procedures reflected by the exception of the prior classification of an equivalent forest in the case of expropriation for reasons of public utility. This simply means that for declassifications made on the basis of a declaration of public utility, the obligation to first classify a forest at least equivalent and of the same category is now lifted[25]. Furthermore, this obligation was limited to the same ecological zone[26] in the 1994 law in order to ensure the maintenance of ecological balance. Does this mean that the latter is no longer a priority for the public authorities since this requirement has disappeared in the new law[27]? At the same time, the new text implicitly admits downgrading for reasons of private utility[28] with an obligation to provide compensation for such cases. Such a provision tends to weaken

Cameroon's commitment to maintain 30% of its territory[29] under the cover of the permanent forest domain. This fragility is also maintained by the perpetuation of the use of the ambiguous concept of public utility to justify the conversion of forests.

As regards the conversion of non-permanent forests, the documents required for the conduct of the projects which justify it should be provided before the decision leading to the conversion is taken.

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25 Ref. Cross-reading of articles 28 paragraph 2 of the 1994 law, article 26 paragraph 2 of draft law No. 2058/PJL/AN and article 26 paragraph 2 of law No. 2024/008 of July 24, 2024.
26 Cf. article 28 paragraph 2 of law N°94/01 of January 20, 1994.
27 Ref. article 26 paragraph 2 of draft law No. 2058/PJL/AN and article 26 paragraph 2 of law No. 2024/008 of July 24, 2024.
28 Reading a contrario of article 26 paragraph 1 & 2 of law N°2024/008 of July 24, 2024.
29 Ref. article 22 of law No. 94/01 of January 20, 1994, article 23 of draft law No. 2058/PJL/AN and article 23 of law No. 2024/008 of July 24, 2024.

The conversion of forests in the two forest areas should also give rise to compensation for local and indigenous communities for compromised usage rights and to appropriate environmental compensation.

4.4. Delegation to individuals and legal entities of forest management activities assigned to the State

The initiative for forest management belongs to the State with the possibility of delegating under its control the related operations to other legal entities or individuals. The possibility left to others to make the inventory poses a risk to the sovereignty of the State over its natural resources when we know that most forestry companies are foreign. It would therefore be necessary to privilege the exclusive competence of the State on the monitoring of forest exploitation and to entrust to an independent administrative authority like ANAFOR the competence to carry out the inventories or to control it if it is done by other natural or legal persons.

In practice, the administration has failed to implement the operational planning, which does not correspond in any way to the principle of assigning the competence for the planning of state-owned forests to their owners (State, Regions and Municipalities). Similarly, planning operations seem to focus solely on the exploitation of wood, whereas they should concern the entire permanent forest area. Similarly, the traceability referred to in the object of the law is not apparent at this level. Hence the need to consider the geolocation of forest inventories carried out as part of forest planning.

Moreover, the thirty-year rotation of forest management no longer seems suitable and adequate for the current context. It was intended to promote the regeneration of forests in order to promote perpetual availability of forest resources. But the implementation of the latter as mentioned above raises questions about its relevance.

4.5. Some conditions and modalities of access and collection of riverside communities to be perfected

Significant progress has been made at this level regarding the exemption from approval for the profit-making exploitation of forest and wildlife resources and the registration procedure required for this purpose in the draft bill; and as highlighted above[30].

These advances could have been better accommodated in the text in certain respects. It should be noted in this regard that the marketing of products resulting from the right of use provided for in the definition of this concept is called into question by the personal use of these products which is set out in Article 6 paragraph 1. Furthermore, the same article restricts the rights of use to the national domain alone while the riparian communities have them over the entire permanent forest domain. This is all the more noticeable since the established practice of co-management agreements for protected areas (MoU) is nowhere mentioned in the operative part of the law while it tends to spread to most of Cameroon's protected areas to guarantee the rights of use of riparian communities over these protected areas. Furthermore, even if marketing in local

30 Ref. 3.2.

markets is a considerable step forward, in that it contributes to a certain extent to the protection of wildlife by limiting its wide marketing, non-timber forest products should expressly be excluded from this provision at the risk of limiting the income of the IPLCs resulting from it.

As regards the specific case of community forests, their purpose is not specified as for other types of forests, their granting is governed by the principle of geographical proximity of the riverside communities, which does not include religious and cultural proximity which should also be taken into account for the allocation of a community forest. Furthermore, failing to extend the duration of the management agreement definitively to perpetuity, it should be increased beyond 25 years and no longer require the five-yearly renewal of the simple management plan. Furthermore, the interventionism of the State in the management of community forests through its substitution of beneficiary communities failing to implement exploitation works must be reviewed in light of the administrative burdens associated with obtaining the relevant documents. In the same vein, the free nature of State services in this context should be clarified. Moreover, it would be desirable to establish a right of preference for the benefit of local communities on the allocation of community forests compared to any other forest title requested in areas where they express an interest in the creation of a community forest.

4.6. Insufficient alignment of the terms of benefit sharing for the benefit of local communities with national and international standards

The text does not take sufficient account of international standards for sharing benefits, in particular that of equitable redistribution in this area in favour of local and indigenous populations; and the orientation of the national development strategy 2020-2030 (SND 30) which is clearly geared towards inclusive development. Indeed, Article 141[31]establishes the general principle of sharing financial resources generated by forestry and wildlife exploitation for the benefit of the State, decentralized local authorities (DLA) and populations. However, the relevant provisions on this subject do not translate this principle into concrete terms. These include:

- The restriction of the economic or financial benefits of the use of genetic resources to the detriment of DLAs and local populations[32];
- The restriction of rights corresponding to environmental services to state forests only, which tends, by reference to their owners (State, DLA), to exclude riparian communities from sharing these benefits[33];
- The failure to mention local communities among the beneficiaries of the annual forestry fee (RFA), which constitutes a serious regression in current positive forestry law[34];
- The absence of a distribution grid[35]rights, taxes and fees provided for in the text both from the point of view of forestry and wildlife exploitation and resources arising from litigation; which is all the more curious since the explanatory statement of the text

31 Article 141: "The State shall take the necessary measures to ensure that the financial resources generated by activities relating to the exploitation of national forest and wildlife heritage resources cover the needs inherent in the renewal of this heritage and contribute to the financing of development projects of the State, Decentralized Territorial Communities and populations."

32 See article 15 paragraph 2.

33 Ref. article 144.

34 See article 142 paragraph 2.

35 See Articles 148 and 151.

presents the specification of the distribution grids for financial resources generated by forestry and wildlife activities as one of the significant innovations of the text.

4.7. Inadequate measures for managing forest and wildlife disputes

The desire to protect forest and wildlife resources already noted[36]has some pitfalls, including:

- The restriction of human-wildlife conflict management to curative measures to the detriment of preventive measures[37]; and the lack of precision on the administration civilly liable for damage caused by animals to property and people;
- The lack of an obligation to transmit the minutes of the preliminary investigation conducted by the judicial police officers with special jurisdiction to the public prosecutor in the text does not sufficiently allow the initiation of public action; and consequently the control of the public prosecutor over the implementation of the transaction;
- The repetition of offences from one article to another, such as the offence of unauthorised logging in a community forest or in a national forest, covered both in Article 168 (a) and 169 (c) with different penalties.

4.8. Inconsistencies in forestry and wildlife reform

The confusions maintained in the text and its inadequacy with other texts that govern natural resources oppose the idea that it "establishes bridges with land issues and other economic activities such as mining"[38]. The inconsistencies thus referred to refer as much to the substance as to the form of the law since they concern both the text itself and its links with the legislation on other natural resources. In this respect:

The text contains some provisions that are inconsistent with the law as a whole. This is the case with the mention of monitoring forest cover and traceability in the subject of the law under revision (art. 1 al. 2). The rest of the text devotes no or very few provisions to these elements of its scope.

Similarly, the categories of the national forest domain retained in the text are in principle[39]the permanent forest area and the non-permanent forest area. However, in the body of the text there appears a category not referred to in Article 21 paragraph 1, namely special forest areas. There is a need for harmonization at this level.

All state forests referred to in the text give rise to the obtaining of a land title for the benefit of their owner, with the exception of community protected areas which, however, fall within the definition of the national domain of the communities (art. 3). Which clearly violates the principle of equality of all before the law and reflects unjustified discrimination against riverside communities regarding the land consequences of the allocation of forests.

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36 Ref. 3.3.
37 See articles 114 to 117.
38 Ref. Interview with Jules Doret NDONGO, Minister of Forests and Wildlife in Cameroon Tribune No. 13131/9330 of June 26, 2024, p.7.
39 See article 21 paragraph 1 of the text.

The forests of the national reserved domain mentioned in the body of the text do not correspond to any category of forest in the law[40]but there are provisions that speak of it (art. 77 al. 1; art. 127 al. 2; art. 165 al. 2-e; art. 166 al. 2-d; art. 167 al. 2-d; art. 168 al. 2-a; art. 169 al. 2-c). It is therefore necessary to remove the occurrences of reserved national domain in the law;

Community protected areas are defined as protected areas falling within the national domain of riparian communities (art. 3), dedicated to forests and managed in accordance with local customs, whereas in the body of the text, it is stated that they fall within the private domain of the State (art.33 al. 2). This confusion may in practice render the benefit of this forest title to riparian communities inoperative;

Also, the provision on the inalienability of permanent forests (art. 22 al. 1) corresponds from a land point of view to the regime of protection of the public domain (art. 2 al. 2 of ordinance No. 74/02 establishing the state property regime) while the land on which these forests are located falls within the private domain of the State (art. 22 al. 2; art. 28 al. 1; art. 29 al. 1; art. 31 al. 1; art. 33 al. 2) with the exception of marine protected areas which fall within the natural public domain (art. 34 al. 2).

Finally, the genetic resources referred to in Article 15 are unduly dissociated from associated traditional knowledge (ACT) while the Nagoya Protocol adopted by Cameroon associates these two elements in the same concept (genetic resources and associated traditional knowledge). This is all the more important since Law No. 2021/014 of July 9, 2021 governing access to genetic resources, their derivatives, associated traditional knowledge and the fair and equitable sharing of benefits arising from their exploitation does not dissociate these terms. It would therefore be necessary to avoid dissociating associated traditional knowledge from the expression genetic resources in the draft law.

40 Ref. articles 22 paragraph 3, 35 paragraph 2, articles 51 and 53 of the text.

5. Conclusion and recommendations

The analysis of the reform of the law on the forest and wildlife regime has made it possible to identify significant progress that can still be improved. Indeed, despite the relevance of the analyses carried out and the deployment carried out to improve the quality of the July 2024 reform, the law adopted has practically not taken into account the recommendations made by civil society on draft law No. 2058/PJL/AN. The only recommendation taken into consideration concerns the omission of paragraph 3 of article 110. The latter was finally incorporated into the law passed so that it includes class B among the partially protected wildlife species. It is therefore important, failing to consider the other recommendations made, to try as much as possible to rectify the situation for the implementing decrees that have yet to be taken. It is at this price that the rights recognized to the riparian communities could actually benefit them and make Cameroon an example of promoting the rule of law in the Congo Basin.

For this purpose, we recommend:

- **To the CSOs**

- To strengthen mobilization around the dynamics of work on the new forestry law

- **To the parliamentarians**

- To take positions more favorable to the rights of IPLCs when voting on laws that could directly affect them;

- To request a revision of the law to take into consideration indigenous populations in the UN sense of the term before the adoption of implementing decrees;

- To strengthen the dynamics of work with CSOs in areas related to the governance of natural resources.

- **To the government**

- To reconsider the current arrangement of the right to participation in favor of better involvement of CSOs and local populations;

- To restore free assistance from the administration in the management of community forests;

- To define the distribution grid for profits from the exploitation of forest and wildlife resources in the text;

- To ensure the consistency of the text with all positive law.

ANNEXES

PROPOSALS FOR AMENDMENT OF BILL N°2058/PJL/AN

Qlddmsdmdl= Proposal for reformulation of the text

~~Qldnlsfffkdll~~= Part to be deleted in the text

REFERENCES	REMARKS/ OBSERVATIONS	REWRITING PROPOSAL
Art.1 al.1	The term politics is a bit too vague	"in order to achieve the objectives of the policy national in forestry and wildlife matters
Art. 1 al.2	Forest cover monitoring and traceability mentioned in the subject have no corresponding provisions in the body of the text	- Remove forest cover monitoring, traceability and legality or put provisions in the corpus to address these aspects

Art. 3	Aligning definitions with international standards. Definitions of agroforestry and leasing Definition of forest is ambiguous. Its second part does not take into account the diversity aspect of planted forests. Important terms are not defined such as community forest and communal forest.	- Forest: “land with a minimum surface area of 0.5 hectares with a forest cover of at least 10%, in which trees, shrubs, etc. predominate.” - A management operation is ‘”” - A subcontracting operation is ‘”” - Community protected area: protected area falling within the national domain of a riverside community, dedicated to the forest and managed in accordance with local customs. - Participative management: a situation in which all stakeholders (the State, NGOs, populations and economic operators) define and guarantee between themselves an equitable sharing of functions, rights and responsibilities for the management of a territory, a zone or a given set of natural resources. - Local and indigenous populations: groups of village populations and indigenous populations who live or reside around, within or near any forest area (including forest plantations) and who exercise customary rights there. - Community forest: is a natural or planted multi-use forest in the non-permanent forest domain allocated for use by the State to one or more neighboring communities which express an interest in its management, conservation, production or renewal of resources in the interest of the community(ies) concerned. - Communal forest: is a forest which is the subject of a classification for the benefit of a municipality, which has been ceded by the State to a municipality or which has been planted by a municipality with a view toproduction, conservation, protection, recreation, wildlife management, teaching and research, resource renewal. - Subcontracting: - Operation in-house:

Article 6, paragraph 1	The right of use is restricted to the national domain and the commercialization aspect provided for in its definition does not emerge.	- Local populations benefit from usage rights on forest and wildlife products collected in the areaforestnational located in their environment for their personal use.They can be marketed in local markets under the conditions set by regulation.
Art. 6 al.2	The term consultation present in the 1994 law and which reflected better involvement of local communities has been replaced by consultation which refers to an opinion whose content is not specified.	- Replace consultation with “consultation”
Art. 11	It is not known exactly when it is to be operated in-house.	- Define operation in management
Art.14	The protection and sustainable management of forests is a mission of general interest, consequently, it should be ensured by all stakeholders.	The protection and sustainable management of forest and wildlife heritage is… It is ensured by the State, the CTDs, the riverside communities and ‘’all other stakeholders’’

Art. 15 para. 1	This article does not take into account the legislation in force on genetic resources, in particular Law No. 2021/014 of July 9, 2021 governing access to genetic resources, their derivatives, associated traditional knowledge and the fair and equitable sharing of benefits arising from their exploitation (APA) which does not consider genetic resources separately from associated traditional knowledge.	Genetic resources and associated traditional knowledgeforest and wildlife heritage belong to the State, to decentralized local authorities and to communities. …
Art. 15 para. 2	The erroneous separation of genetic resources and associated traditional knowledge decried above has resulted in the exclusion of communities and decentralized territorial authorities from sharing its benefits.	The economic or financial benefits resulting from the use of the resources referred to in paragraph 1 above give rise to payment to the State, to decentralized local authorities and to communitiesroyalties whose cost and collection terms are set, in proportion to their value, in accordance with the laws and regulations in force.
Art. 17 para. 1	The prior requirement and declaration of public utility for clearing must be maintained	- The clearing of all or part of a classified forest is subject to ‘’to a declaration of public utility’’ and to the total or partial declassification of said forest.

Art. 21 al	The classification of the national forest domain into permanent domain and non-permanent domain does not correspond with the category of special forest areas created in the text.	- The national forest area consists of the permanent forest area,and the non-permanent forest area and special forest areas
Art. 26 al. 2	The exception of the public utility cause is a risk on Cameroon's international commitment to maintain 30% of forest cover across the entire national territory	- The total or partial declassification of a forest can only take place after classification of a forest of the same category and of at least an equivalent surface area. Except in the case of expropriation for reasons of public utility.

Art. 33 para. 2	The definition of the community protected area clearly states that it falls within the national domain of a community. Which is contradictory to its classification in the private domain of the State. Like all similar forests, it should also give rise to the establishment of a land title for the communities. The prohibition of changing the purpose of this space or a termination clause of sale or a prior visa to this effect would be sufficient to prevent land speculation on these spaces.	Community protected areas are part of the private domain of the Statecommunities/The classification of a community protected area gives rise to the establishment of a land title for the benefit of the beneficiary community.
Art. 37 para. 1	There is no clear definition of the community forest, it does not set the objectives of the community forest in the objectives a bit like it is done in the definition of the communal forest	A community forest is a natural forest in the non-permanent forest domain, allocated for use by the State to a local community which shows an interest in it.This multi-purpose space can be dedicated in particular to production, conservation, protection, recreation, wildlife management, teaching, research and resource renewal..

Art. 37 para. 2	The right of priority granted to riparian communities only seems to apply in the event of competing expressions of interest in the creation of a community forest between several communities; it must be extended to other forest titles.	The allocation of a community forest is accompanied by a management agreement and a simple management plan;it is made in priority to the allocation of any other forest title.
Art. 37	Adding a paragraph The consequences of the allocation of a forest on the land rights granted to public persons are not recognized by the communities living near their forest.	The allocation of a community forest gives rise to the right to the establishment of a land title for the benefit of the beneficiary community.
Art. 38 al.2	This provision as stated enshrines too much State intervention in the management of community forests.	…Their failure to comply within the set deadlines may result in total or partial withdrawalthe suspensionof the right of enjoyment granted to the beneficiary communityfor the duration necessary for regularization.
Article 39 para. 1	The mandatory nature of MINFOF technical assistance is ambiguous. It is not clear whether it is the administration that is obliged to provide assistance or whether it is the communities that are obliged to resort to MINFOF assistance.	The implementation of the community forest management agreement is ensured by the community concerned, under mandatory assistance and technical controlfreeof the administration in charge of forests.

Article 39 para. 2	This provision as stated enshrines too great and severe interventionism by the State in the management of community forests.	… the State, depending on the case, may carry out ex officio, at the expense of the community concerned, the work necessary for the exploitation of the community forest or terminate suspend the management agreement, without prejudice to the usage rights recognized to the beneficiary community.
Article 46 para. 2	The duration of the definitive management agreement is not determined	It is suggested that it be awarded for an indefinite period or, failing that, to eliminate the five-year renewal of the simple management plan.
Article 47 para. 2	This provision as stated enshrines too great and severe interventionism by the State in the management of community forests.	…the administration, depending on the case, may carry out ex officio, at the expense of the community concerned, the necessary works or terminate suspendthe agreement, without prejudice to recognized usage rights.
Art. 51 para. 2	This provision as stated enshrines too great and severe interventionism by the State in the management of community forests.	…the administration, depending on the case, may carry out ex officio, at the expense of the community concerned, the necessary works or terminate suspendthe agreement, without prejudice to recognized usage rights.
Art. 55	The development operations seem to focus solely on the exploitation of wood, whereas this should be done across the entire permanent forest area.	- Ecological monitoring - Participatory mapping - Anti-poaching fight
Art. 56 al 2	Add under state control. The possibility of leaving it to others to take inventory puts the State at risk of losing resources that are precious to its sovereignty.	- …Or,~~belowits control, by other natural or legal persons benefiting from an agreement~~

Art. 57 al 2	There is no definition of inventory types	- Integrate different types of inventory and emphasize geolocation of stems in operating inventories
Article 57 al 1	Added a paragraph on geolocation	…Or,~~below~~~~its control, by other natural or legal persons benefiting from an agreement~~
Art. 59 al 2	It contradicts Article 56 paragraph 2 concerning the prior development of forests by their owners.	
Art. 59 al 3	Forest exploitation titles should be granted to all stakeholders.	Forest exploitation titles can only be granted to natural persons residing in Cameroon or to companies having their headquarters there, and whose share capital composition is known to the administration in charge of forests, to decentralized local authorities and communities.
Art. 60 al 1	Community forests must not be subcontracted	The beneficiaries of registered operating securities at the exception of community forests may subcontract some of their activities, subject to the prior agreement of the Administration responsible for forests
Art. 64 al 2	The rights of riparian communities must be directly mentioned in operating agreements and taken into account accordingly.	The operating agreement is accompanied by specifications Who defines the rights and obligations of the State as well as those of the beneficiary and riverside communities
Art. 72 al 1	Sales of stumpage should not be allocated in community forests	The exploitation of a community forest is carried out on behalf of the community, in an artisanal and sustainable manner, in-house or by subcontracting through the sale of felling by exploitation permit or by personal felling authorization, in accordance with the simple management plan approved by the administration in charge of forests.
Art. 77 para. 1	The reserved national domain is not an existing land category in land and property legislation.	The personal cutting permit is an authorization issued to a natural person in the national reserved domain, for the purpose of collecting quantities…

Art. 85	The measurement must apply to all balls.	Logs without any apparent local markings washed up on the Atlantic coast or abandoned along the roads are the property of the State and can be transferred to any natural or legal person. Who requests it according to terms defined by regulation
Art. 106 al 1	The development should integrate participatory mapping to enable the interests of the local communities involved to be documented.	Add participatory mapping
Art. 110	Forgetting paragraph 3 present in law 94, it is necessary to include the provisions relating to class B of wildlife species	
Art. 127 para. 2	The reserved national domain is not an existing land category in land and property legislation.	Areas of nationally reserved forest may be declared hunting zones and exploited as such.
Art. 142 al 1	The exclusion of riverside communities from sharing the RFA and other taxes is unjustified.	The duties, taxes and charges referred to in paragraph 1 above are distributed between the public treasury, the municipality concerned, the communities concerned, the special forestry development fund and recovery support.
Article 144	The circumscription of rights arising from environmental services is not justified, these rights must be extended to all forests	Environmental services produced by state forests of the national forest domain and referred to in this law give rise to the collection of the corresponding fees.
Art.147	All income from forests must benefit all stakeholders	For the exploitation of their forests by sale of felling, by subcontracting or by permit, the regions, the municipalities, the riverside communities and the individuals receive the price of the sale of the forest products and the annual forestry royalty and from any other income excluding taxes, duties and charges relating to related activities common.

Art. 148 para. 2	Insert a distribution grid	- To claim the benefit of the shares by 10%of the various fees and taxes provided for by this law, the riparian communities must constitute themselves as a legal entity.
Art. 148 para. 3	Addition	- The share allocated to the riverside communities is paid to the legal entity of location titles for the exploitation of forest products for the financing of development projects for local communities.
Art. 151 para. 3	Transfer the share allocated to them directly to the communities through a legal entity without first transferring it to the municipalities	The share allocated to the local communities is returned to the municipality where it is located the legal entity of location titles for the exploitation of wildlife products for the financing of development projects for riverside communities.
Art. 156 al. 2	The public prosecutor must take into account the office of judicial police officers with special competence.	They draw up minutes of their operations and forward them to the public prosecutor.
Art. 157 &l. 2	The damage caused by a forest or wildlife offence is not only suffered by the State but by other stakeholders such as local communities and decentralised local authorities.	The transaction, in forestry and wildlife matters, of the damage caused to the State, to decentralized local authorities and to riverside communities.
Art. 157 para. 8	Add more cases	- In case of non-compliance with the minimum operating diameter - In case of exploitation in areas with fragile ecology - In the event of serious damage to local communities

Art. 159 para. 1	As soon as the file is transmitted to the hierarchical superior, the public prosecutor should already have an eye on the procedure since the judicial police officers with special competence are also subject to his authority.	Police officers …, within seventy-two (72) hours after the closure of the investigation with a copy to the public prosecutor.
Art. 159 para. 2	The prosecution must exercise control at all levels of the investigation if it so wishes.	The hierarchical managers receiving the minutes have a maximum period of three (03) months to reach a compromise, if necessary. under the supervision of the public prosecutor and failing that, set public action in motion.
Art. 165 al. e	The reserved national domain is not an existing land category in land and property legislation.	Exploitation by personal cutting authorization in a forest of the national domain reserved for lucrative use, ...
Art. 166 al. d	The reserved national domain is not an existing land category in land and property legislation.	The exploitation by permit, in a forest of the national reserved domain, of unauthorized forest products, …
Art. 167 al. d	The reserved national domain is not an existing land category in land and property legislation.	Exploitation by sale of felling in a forest of the national reserved domain beyond the limits of the determined felling area…
Art. 168 al. a	The reserved national domain is not an existing land category in land and property legislation.	Unauthorized exploitation in a community forest or a forest in the national reserved domain in violation of Articles 35 to 38 and 72
Art. 169 al. c	The reserved national domain is not an existing land category in land and property legislation.	Unauthorized exploitation in a community forest or a forest in the national reserved domain in violation of Article 72
Article 186	Addition: the creation of a special fund dedicated to financing forest renewal is proposed.	Regeneration Fund reforestation, restoration and forest planting

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