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# LIST OF ABBREVIATIONS

a: are

ca: Centiare

CAMVERT S.A.: Société Anonyme Cameroon Vert

Cf.: confer

GDA: Green Development Advocates

ha: hectare

MINDCAF: Ministry of State Property, Survey and Land Tenure

MINFOF: Ministry of Forestry and Wildlife

CSO: Civil Society Organization

PM: Prime Minister

PES: Payment for Ecosystem Services

NDS 30: National Development Strategy 2020-2030

FMU: Forest Management Unit

TOU: Technical Operational Unit

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# **EXECUTIVE SUMMARY**

The process of converting forests to agro-industry, which was to begin in Campo in 2019, is strewn with illegalities. Some of these had already been highlighted in an analysis (https:// gdacameroon.org/download/312/) namely the precedence of management deeds over the act of allocation with regard to land; the lack of a declaration of public utility and an environmental and social impact assessment (ESIA) for the decommissioning decree with regard to forest resources. Other illegalities will emerge from the shadows in this analysis note, with regard to both land concessions and forest declassification. In the case of the latter, the absence of a beneficiary public service and the lack of a regulatory framework for the transfer of declassified forest. The fact that decree No. 2019/4562 of 11 November 2019 allocated the declassified area for agricultural production is a problem. As far as the land concession is concerned, the presentation of its illegalities first required a brief reminder of the normative framework that governs it, namely Decree. No. 76/166 of 27 April 1976 setting the terms and conditions for the management of the national domain. In fact, positive law does not allow a property to be transferred from the State's private domain to the national domain. However, the concession decree wrongly assumed that such a transfer was legal and normal. This new look at a particular situation has above all enabled us to identify the inconsistency of natural resource governance in Cameroon and to formulate recommendations for political decision-makers.

# INTRODUCTION

The tip of the iceberg refers to a seemingly insignificant or at least surmountable obstacle that conceals a deeper difficulty likely to cause misfortune to anyone who ventures to overcome it. In many ways, the Campo district is the tip of the iceberg when it comes to land and forest management. The Cameroonian government had undoubtedly thought it had begun to manage natural resources in this area, with the creation of the Campo-Ma'an Technical Operational Unit (TOU)<sup>1</sup>, the eponymous national park and the Manyange Na Elombo Campo marine national park<sup>2</sup>. These laudable measures to conserve biodiversity, while somewhat detrimental to the local population, are offset by others that are far less respectful of this area of high ecological and environmental interest and vital to the local population. These include the creation of Forest Management Unit (FMU) 09 0253, the partial declassification4, of a 60,000-hectare area for agricultural production, the allocation of illegal logging sales<sup>5</sup> in this area, and the illegal allocation of a 39,923-hectare 01 are 07 centiare<sup>6</sup> parcel of the same area as a provisional concession. The illegalities<sup>7</sup> of the aforementioned declassification and concession were skillfully documented by Green Development Advocates (GDA), a Cameroonian civil society organization (CSO) specialized in advocacy. However, the exercise has not exhausted the subject, since the illegalities that have clearly been revealed barely conceal others that are even more subtle and have equally serious consequences. In these lines, it is precisely in this perspective that the locality of Campo will be considered as the "tip of the iceberg".

Cf. Prime Minister's Decree No. 054/PM of 6 August 1999, creating a first category Campo-Ma'an operational technical unit covering 776,202 hectares, whose mission is to ensure the participatory management of natural resources, and wildlife in particular.

2 Cf. decree No. 2021/4804/PM of 9 July 2021 establishing Manyange Na Elombo Campo national marine

park.

Cf. Decree No. 2005/0527/PM of 14 February 2005 incorporating a portion of forest measuring 88,147.84 hectares into the State's private domain and classifying it as a forest management unit known as UFA 09 025.

Cf. Decree No. 2019/4562 of 11 November 2019 of the Prime Minister, Head of Government, declassi-

fying part of the forest in the private domain of the State in Campo and Niété sub-divisions.

Cf. decision N0. 0011/A/MINFOF/SETAT/SG/DF/SDAFF/SC/SAG allocating the logging area N0. 09

<sup>03 516</sup> to the logging company SANI et Fils; Decision N0. 0012/A/MINFOF/SETAT/SG/DF/SDAFF/SC/SAG allocating the logging area N0. 09 03 517 to the Société Forestière et des Services du Cameroun SA; Decision N0. 0013/A/MINFOF/SETAT/SG/DF/SDAFF/SC/SAG allocating the logging area N0. 09 03 518 to the Société Forestière et des Services du Cameroun SA; Decision N0. 0014/A/MINFOF/SETAT/SG/DF/SDAFF/SC/SAG allocating the logging area N0. 09 03 519 to the Société Forestière des Frères du Cameroun SARL; Decision N0. 0015/A/MINFOF/SETAT/SG/DF/SDAFF/SC/SAG allocating the logging area N0. 09 03 520 to the Société Forestière des Frères du Cameroun SARL; see for a more global reading of the illegalities of these decisions, GDA & GPA, , Camouflaged destruction: Plundering the forests of Campo under the pretext of a so-called 'development project' Legal analysis of decrees n°0011, 0012, 0013, 0014, 0015 granting sales of felling as part of the implementation of a development project in the Campo national estate, October 2022 <a href="https://gdacameroon.org/">https://gdacameroon.org/</a> download/826/.

<sup>&</sup>lt;sup>6</sup>Cf. decree N0. 2022/112 of 7 March 2022 granting a provisional concession to the CAMEROUN VERT (CAMVERT) S.A. of a section of the national domain, located at the "Malaba-Akak-Lobé village" boundary in Campo sub-division, Ocean division, South region.

Cf. GDA, the 'minor illegalities' in the process of declassifying and granting concessions for 60,000 ha of forest to an agro-industry in Campo and Nyété, August 2020 https://gdacameroon.org/download/320/. Other CSOs also denounced the misdeeds of this process.

# METHODOLOGY

With a view to uncovering the hidden face of this iceberg of illegalities, the legal positivism method shall be used. This denies any value to ideal or natural law, and confines itself to legal rules enacted by the State (laws, decrees, judgments). The advantage of this method is that the State is bound to comply with the rules of law it has itself created. It is mainly the exegesis aspect of this method, which consists in interpreting and explaining the rules of law, that will be mobilized; and secondarily its casuistic aspect, which is more concerned with the rules resulting from court decisions. The methods used to interpret legal texts<sup>8</sup> are literal interpretation, to examine the letter of the texts in force; teleological interpretation, to study their spirit; and systemic interpretation, to verify the consistency of this process with Cameroonian positive law as a whole.

It should be emphasised that the developments that follow have been drawn up on the basis of Law No. 94/01 of 20 January 1994 governing forests, wildlife and fisheries. The amendment of this law on 24 July 2024 by law N°2024/0008 on the forest and wildlife regime does not therefore change the substance of the arguments presented. Even if the new provisions are slightly different in the 2024 text, the facts on which the study is based were committed under the 1994 law, so the reasoning that follows remains entirely valid.

This analysis was forwarded in ample time to the administrative authorities to inform them of the asperities discovered in the Camvert case. Their silence has prompted us to make public the results of our analysis.

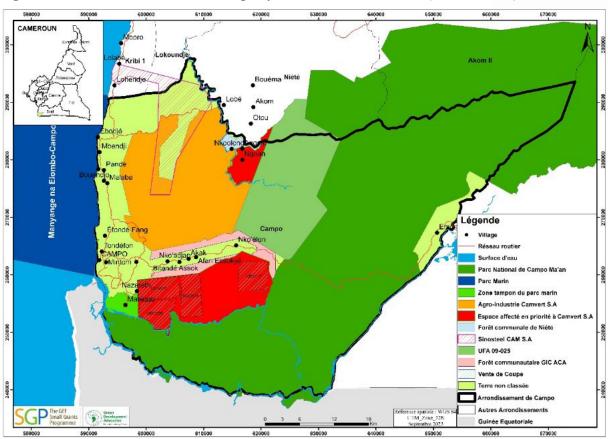
With a view to enlightening decision-makers, this analysis note aims to highlight the still-veiled irregularities in the processes that led to the award of an agro-industrial land concession in Campo. The area in question will first be presented.



<sup>8</sup> All the interpretations made in this note are the fruit of the objective reflections of GDA analysts and not of official interpretations from the administration.

### I. BRIEF OVERVIEW OF THE AREA CONCERNED

The area of 60,000 hectares of forest declassified to the benefit of an agro-industrial oil palm project is located in Campo sub-division, Ocean division in the South Region of Cameroon. It comprises (Figure 1) of a 39,923 hectares plot allocated as a provisional concession to the agro-industrial company Camvert S.A and two plots with a total surface area of 20,077 hectares allocated to it as a priority under the terms of **Decree No. 2022/112 of 7 March 2022 allocating a provisional concession to the company CAMEROUN VERT (CAMVERT) S.A.** 



**Figure 1:** Location of the agro-industrial concession granted to CAMVERT S.A. and the priority blocks allocated to it

# II. OTHER ILLEGALITIES IN THE PROCESS OF CONVERTING FOREST TO AGRO-INDUSTRY IN CAMPO

The mention of other illegalities relating to the forest conversion process initiated in Campo for the establishment of an oil palm agro-industry assumes that some have already been brought to light<sup>9</sup> and that specific illegalities from the first will be presented. To do this, it is enough to consider the declassification process (A) separately from the concession process (B)

These are precisely the precedence of management acts over the act of allocation as far as land is concerned; and failure to declare the project to be in the public interest and the subsequent nature of the environmental and social impact assessment (ESIA) to the declassification as far as forest resources are concerned; see in this regard GDA, op. cit. <a href="https://gdacameroon.org/download/312/">https://gdacameroon.org/download/312/</a>.

# A- OTHER ILLEGALITIES IN THE PROCESS OF DECLASSIFYING A PARCEL OF FOREST IN CAMPO

This analysis focuses on two further illegalities affecting the legality of the declassification process in question, namely the lack of a legal beneficiary and the lack of a reversionary estate for the declassified forest parcel.

# 1- Lack of a statutory beneficiary for the declassification process

According to article 22 paragraph 2-a of decree No. 95/531/PM of 26 August 1995 setting out the terms and conditions for applying the forestry regime, the applicant must complete the formalities 10 before a forest can be downgraded. Article 22 paragraph 2-b of the same decree specifies the identity of the applicant, stating that: "This declassification shall give rise to the allocation of the forest concerned to the beneficiary public service, which shall be responsible for it". If we rely on the letter of this text, it is clear that a declassified forest must be assigned to a specific beneficiary, namely a public service. In a material sense, public service means an activity designed to satisfy a need of general interest. From this substantive perspective, there is little likelihood of a public service mission being the applicant for declassification. This leads us to consider the formal meaning of public service, which refers to the organized set of material and human resources used by the State or another public authority to accomplish its tasks<sup>11</sup>; which simply refers to public administration. In other words, decommissioning can only take place for the benefit of a dismemberment of the State or, more clearly, a public administration. Meanwhile, a reading of the aforementioned declassification decree No. 2019/4562 of 11 November 2019 does not explicitly mention any public service as the beneficiary of the allocation of the 60,000-hectare parcel of declassified forest. Article 1 of the said decree<sup>12</sup> makes this abundantly clear: "The parcel of forest with a surface area of 60,000 ha, located in the Campo and Niété sub-divisions, Ocean Division, South Region, and forming part of a larger complex with an area of 88,147.84 ha, incorporated into the private domain of the State as a production forest by decree No. 2005/0527/PM of 14 February 2005, is declassified with effect from the date of signature of this decree, to be assigned to agricultural production". This is simply to say that the absence of any explicit mention of a public administration benefiting<sup>13</sup> from the aforementioned allocation is an obstacle to the declassification of the 60,000-hectare parcel of forest by the 2019 decree. This is also the case for the area to which it was presumably assigned.

This involves, among other things, carrying out an environmental and social impact assessment (ESIA).

Serges GUINCHARD et Thierry DEBARD, Lexique des termes juridiques, Paris, Dalloz, 2017-2018, 25è édition, p. 868.

The other three articles of this decree are also silent on the beneficiary public service of the declassification.

Even on the subject of land resources, the notorious exception to this cardinal rule of public ownership is the allocation of a property as a holding in the capital of commercial companies, Cf. article 12 of decree N0. 76/167 of 27 April 1976.



# 2- Lack of an Assignee for the Declassified Forest Parcel

The category to which the declassified forest plot would have been assigned also constitutes a legal obstacle to its declassification. According to article 22 paragraph 2-b of the aforementioned decree No. 95/531/PM of 26 August 1995: "This declassification shall give rise to the allocation of the forest concerned to the beneficiary public service, which shall be responsible for it".

In administrative property law (state ownership), allocation<sup>14</sup> is the method used to classify an asset (in this case a building) in the domain of the State or another legal entity governed by public law. This clearly means, according to the terms of the aforementioned text, that the allocation cannot be made outside the domain. Order No. 74/02 of 06 July 1974 establishing the land tenure system "governs the public domain, the private domain of the State and other legal entities governed by public law"15. However, the declassified area was not allocated either to the public domain or to the private domain of the State and other legal entities under public law; it was simply used for a specific purpose, namely agricultural production, which corresponds more to the national domain<sup>16</sup> than to the regulatory category<sup>17</sup> of reversion of a parcel of declassified forest. In other words, the said parcel should not only have been assigned to a public service, but should also have been in the private domain of the public service that should have benefited from the declassification and not in the national domain, which corresponds to agricultural use. In short, the absence of a regulatory beneficiary and the lack of a designated area are shortcomings likely to vitiate the legality of the process of declassifying the forest parcel in question and affect the legality of the provisional concession granted to this agroindustry.

formally, it is not governed by the text that sets out the system of state ownership.

17 It is the private domain of a public service Cf. article 22 paragraph 2-b of decree N0. 95/531/PM of 26 August 1995.

Serges GUINCHARD et Thierry DEBARD, Lexique des termes juridiques, op. cit. p. 41; Article 2 of Decree N0. 76/167 of 27 April 1976 setting out the procedures for managing the State's private domain states that: "assignment is an act by which the State makes available to the public a dependency of its private domain". It should be noted that the letter of this text betrays its spirit, since "a public" undoubtedly refers to "public service", given that in terms of State property, only property in the State's public domain may be assigned for the direct use of the public, cf. article 2 of order N0. 74/02 of 06 July 1974 establishing the State property regime.

Cf. article 1 of order N0. 74/02 of 6 July 1974.

This correspondence is formally recorded in article 1 of concession decree N0. 2022/112 of 7 March 2022, which states that: "is, from the date of signature of this decree, allocated as a provisional concession to ... a dependency of the national domain with a surface area of 39,923 ha 01 a 07 ca located at the "Malaba-Akak-Lobé village" boundary in Campo sub-division, Ocean division, South region". Notwithstanding its name, the national domain cannot be classified as state-owned because, materially, it is not formed by the method of allocation and, formally, it is not governed by the text that sets out the system of state ownership.

# B- UNDUE AWARD OF THE PROVISIONAL CONCESSION: NO LEGAL BASIS FOR THE TRANSFER OF AN IMMOVABLE PROPERTY FROM THE PRIVATE DOMAIN OF THE STATE TO THE NATIONAL DOMAIN

The illegality of the concession process to be revealed at this level is closely linked to that of the declassification referred to above. In order to understand this, it must be realized that the space in question is still part of the State's private domain (2), that the State's dependencies cannot be transferred to the national domain (3) and, consequently, that the provisional concession of the space in question is irregular (4). Before dwelling on the undisclosed unlawfulness of the concession process in question, a number of preliminaries should be mentioned (1).

# 1- The State of the Law Regarding Concession in Cameroon

The focus here is not to set out in detail the state of the law and regulations relating to the concession procedure, as this exercise has already been carried out with remarkable simplicity<sup>18</sup> and with a focus on the Campo case<sup>19</sup>. It is worth recalling that the concession is a procedure for allocating land to anyone wishing to carry out a development project. It is governed by **Decree No. 76/166 of 27 April 1976, which sets out the procedures for managing the national domain**. In other words, it is a second category of national estate management, which refers to what the law designates as land free of any effective occupation<sup>20</sup>. This is a worthwhile clarification, given that the first category national estate, comprising land for housing, cultivation, grazing, planting and rangelands<sup>21</sup> is governed by Decree **No. 76/165 of 27 April 1976 laying down the conditions for obtaining a land title, as amended and supplemented by Decree No. 2005/481 of 16 December 2005, and is managed using the direct registration procedure. Once these preliminaries have been established, all that remains to be done is to check that the process complies with the legal rules set out.** 

# 2- The Land in Question still Belongs to the State's Private Domain.

To see that the area in question is currently part of the State's private domain, we must first refer to article 25 paragraph 1 of the 1994 law, which specifies that: "State forests shall be part of the private domain of the State". This clearly shows that classifying a forest as state-owned means classifying the land on which it stands as state-owned (private domain). In other words, by creating FMU 09 025 by decree No. 2005/0527/PM of 14 February 2005, the Prime Minister, Head of Government, incorporated the 88,147.84 hectares of land bearing this forest into the State's private domain. However, the declassification of a State forest does not subsequently entail the disincorporation of the land on which it is located from the State's private domain. This clearly means that the land on which the 60,000 hectares of declassified forest rests remained in the State's private domain after the 2019 declassification, if we rely on Article 22 paragraph 3 of Decree No. 95/531/PM of 26 August 1995, which states that: "After this

<sup>18</sup> Cf. GDA, Le processus d'attribution des terres du domaine national au Cameroun : ce que les communautés doivent savoir, Guide pratique à l'usage des populations rurales, Octobre 2021, <a href="https://gdacameroon.org/download/777/">https://gdacameroon.org/download/777/</a>.

<sup>19</sup> Cf. Green Peace Africa, Guide pratique à l'attention des communautés impactées par les agro-industries au Cameroun, tome 1, Comprendre la concession provisoire et ses implications pour les communautés : cas de Camvert, novembre 2023.

<sup>20</sup> Cf. article 15 paragraph 2 of order No. 74/01 of 6 July 1974 establishing the land regime. It is also clear that indigenous forest peoples have occupied such areas since time immemorial without leaving any immediately visible traces. The participatory mapping work carried out by GDA in the project's target villages provides ample evidence of this

<sup>21</sup> Cf. article 15 paragraph 1 of order N0. 74/01 of 6 July 1974 establishing the land regime.

decommissioning, the land in question shall be managed in accordance with the land tenure system in force".

# 3- The State's private domain cannot be transferred to the national domain

According to current legislation, the national domain cannot be extended from the State's private domain. The legal management of this domain<sup>22</sup> from which the area in question is extracted, does not offer the possibility of transferring land from the State's private domain to the national domain, nor does the domanial regime in force<sup>23</sup>. **Article 12** of the text establishing this system states that: "*The State's private domain may be:* 

- assigned to public services;
- transferred to legal entities governed by public law;
- allocated as a share in the capital of companies with the right to be reincorporated into the private domain of the State in the event of the dissolution, bankruptcy or liquidation of such companies;
- allotted for use or ownership to natural persons or legal entities;
- allocated for use or ownership to international organisations of which Cameroon is a member.
- allocated for use or ownership and subject to reciprocity to diplomatic or consular missions accredited to Cameroon.

# The terms and conditions of such allocations shall be established by decree<sup>24</sup>.

In accordance with the letter of these provisions, the decree of declassification, which paradoxically also effects<sup>25</sup> the allocation, should have given concrete form to one of the hypotheses cited in article 12 of the decree establishing the property regime. However, it is clear to everyone that the land bearing the declassified forest has not been allocated (according to the decree of decommissioning) to public services<sup>26</sup>, nor transferred to legal entities under public law<sup>27</sup>, nor allocated in possession or ownership to natural or legal persons<sup>28</sup> and even less to an international organization of which Cameroon is a member, or even to a diplomatic or consular mission. The only doubt that remains relates to the hypothesis of a shareholding in the capital of a company. However, the information available does not allow us to affirm that the State is a shareholder in the agro-industry to which the land in question has been allocated under a provisional concession, which would tend to remove any doubt. To be more legalistic,

- 23 Cf. article 22 paragraph 3 of decree N0. 95/531/PM of 26 August 1995.
- 24 Cf. article 12 of order N0. 74/02 of 6 July 1974 establishing the land regime.
- 25 Cf. <a href="https://gdacameroon.org/download/312/">https://gdacameroon.org/download/312/</a>
- See supra p.5-6. This argument is supported by Article 3 of Decree No. 76/167 of 27 April 1976 setting out the terms and conditions for the management of the State's private domain, which states that: "any public service wishing to benefit from the allocation of State-owned land shall submit a request to the Senior Divisional Officer of the division in which the property requested is located".
- 27 Cf. article 11 of decree No. 76/167 setting out the terms and conditions for the management of the State's private domain.
- While it is possible that this allocation for use or ownership to natural persons or legal entities may be for agricultural purposes (see declassification decree), it is no less true that the procedure to be followed in this case would have been the conclusion of an ordinary or long lease (see articles 16 to 26 of Decree N0. 76/167 of 27 April 1976) and not the procedure of allocation under a provisional concession, as is the case here, since this presupposes undue transit through the national domain (see page 12).

As provided for in Decree N0. 76/167 setting out the terms and conditions for the management of the State's private domain.

article 1 of the aforementioned decree of declassification does not support such an assumption. This text is rather clear in mentioning "use for agricultural production"<sup>29</sup>. This is not in line with the domain regime<sup>30</sup> and even less so with the forest regime, since such a use presupposes the transfer of the land in question from the State's private domain to the national domain. Unfortunately, this assumption has been made without any valid legal basis by the public authorities, if the terms of concession decree No. 2022/112 of 7 March 2022 are anything to go by. Article 1 states that: "from the date of signature of this decree, allocated as a provisional concession to ... a dependency of the national domain with a surface area of 39,923 ha 01 a 07 ca located at the "Malaba-Akak-Lobé village" boundary in Campo sub-division, Ocean division, South region".

The assumption that this transfer was irregular could be invalidated if we consider the principle of parallelism of forms and procedures. By application of this principle of public law, since the classification of the forest entails that of the land, the declassification of the forest should normally entail that of the land. Such an interpretation would disregard not only the terms of article 22 paragraph 3 of the aforementioned<sup>31</sup> decree No. 95/531/PM of 26 August 1995, but also the meaning of the said text, which clearly distinguishes between the effects of the classification and those of the declassification of a forest on the land.

# 4- The Provisional Concession Granted to the Agro-industry is Therefore Irregular.

As a result of the foregoing, the transfer of land from the State's private domain to the national domain is invalid, and the land in question is still theoretically part of the State's private domain. However, only second-category national domain land can be granted as a provisional concession. Consequently, the postulated invalidity of this land transfer entails the illegality of the provisional concession granted. However, the full extent of this invalidity must be taken into account.



And not an allocation through participation in the capital of a company.

Article 12 of the aforementioned State property regime makes no mention of the national domain for this purpose.

This article states that: "After this declassification, the land in question shall be managed in accordance with the land tenure system in force".

# CONCLUSION AND RECOMMENDATIONS

The tip of the iceberg behind this innocuous title lies in a timely piece of work: highlighting new illegalities in the process of converting forest into agro-industry in Campo and taking a holistic look at them. As the subtitle aptly points out, beyond the illegalities highlighted, it is the administration's forcing of blatantly inconsistent actions that is called into question. This has an impact on both the business climate and Cameroon's reputation as a destination. In the light of all these observations, a number of recommendations need to be made. They are addressed to various stakeholders:

## • To the Administration

## These include:

- Acknowledge the legal non-existence of the conversion of the Campo forest into an agro-industry;
- Stop the project in view of the illegalities demonstrated, and simply withdraw the declassification and concession decrees;
- Ensure the consistent application of current standards in the management of natural resources;
- Promote healthier and more fruitful collaboration with CSOs;
- Ensure that the respective legal regimes for the various natural resources are consistent, by introducing appropriate reforms.

#### • To the Communities:

# These include:

- Have any irregularities brought to light by a judge, by initiating non-judicial or judicial proceedings, including actions for compensation for damage caused by the effects of the declassification and concession decrees;
- To support the advocacy actions of CSOs wishing to support them in establishing the irregularities brought to light.

# • To Civil Society Organisations:

# These include:

- Taking stock of the illegalities that have been uncovered and lobbying for the cancellation of irregular processes;
- Supporting local communities wishing to have the irregularities established by a judge by initiating legal proceedings;
- Documenting the need for consistency between the respective legal regimes for each natural resource.

# REFERENCES

#### **Texts**

- 1- Law N0. 94/01 of 20 January 1994 on the forestry and wildlife regime
- 2- Law N0. 2006/022 of 29 December 2006 fixing the organization and the functioning of the Supreme Court
- 3- Order N0. 74/01 of 6 July 1974 establishing the land regime.
- 4- Order N0. 74/02 of 6 July 1974 establishing the State property regime.
- 5- Decree N0. 76/165 of 27 April 1976 to organize the Government amended and supplemented by Decree N0. 2005/481 of 16 December 2005
- 6- Decree N0. 76/166 of 27 April 1976 laying down the procedures for the management of the national domain
- 7- Mindful of Decree N0. 76/167 of 27 April 1976 laying down the procedures for the management of the State's private domain
- 8- Decree N0. 94/199 of 7 October 1994 on the general status of the State civil service, modified and supplemented by decree N0. 2000/287 of 12 October 2000.
- 9- Decree N0. 95/531/PM of 26 August 1995 laying down the modalities for the application of Law N0. 94/01 of 20 January 1994 on forest, wildlife and fisheries regime
- 10-Decree No. 2005/0527/PM of 14 February 2005 incorporating a portion of forest measuring 88,147.84 hectares into the State's private domain and classifying it as a forest management unit known as UFA 09 025
- 11- Decree N0. 2019/4562 of 11 November 2019 of the Prime Minister, Head of Government, declassifying part of the forest in the private domain of the State in Campo and Niété sub-divisions.
- 12-Cf. decree N0. 2022/112 of 7 March 2022 granting a provisional concession to the CAMEROUN VERT (CAMVERT) S.A. of a section of the national domain, located at the "Malaba-Akak-Lobé village" boundary in Campo sub-division, Ocean division, South region.
- 13- Prime Minister's Order N0. 054/PM of 06 August 1999 creating the Campo-Ma'an first category operational technical unit covering an area of 776,202 hectares
- 14-Order N0. 0011/A/MINFOF/SETAT/SG/DF/SDAFF/SC/SAG of 16 February 2022 allocating the sale of standing volume N0. 09 03 516 to the logging company SANI et Fils
- 15-Order N0. 0012/A/MINFOF/SETAT/SG/DF/SDAFF/SC/SAG of 16 February 2022 allocating the sale N0. 09 03 517 to Société Forestière et des Services du Cameroun SA
- 16-Order N0. 0012/A/MINFOF/SETAT/SG/DF/SDAFF/SC/SAG of 16 February 2022 allocating the sale of standing volume N0. 09 03 517 to Société Forestière et des Services du Cameroun SA
- 17- Order N0. 0014/A/MINFOF/SETAT/SG/DF/SDAFF/SC/SAG of 16 February 2022 allocating the sale of standing volume N0. 09 03 519 to the Société Forestière des Frères du Cameroun SARL
- 18-Order N0. 0015/A/MINFOF/SETAT/SG/DF/SDAFF/SC/SAG of 16 February 2022 allocating the sale of standing volume N0. 09 03 520 to the Société Forestière des Frères du Cameroun SARL.

# **Others**

- 19- Cf. Cameroun: vision 2035, February 2009.
- 20- Cf. GDA, The 'minor illegalities' in the process of declassifying and granting concessions for 60,000 ha of forest to an agro-industry in Campo and Nyété, August 2020 <a href="https://gdacameroon.org/download/320/">https://gdacameroon.org/download/320/</a>.
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# Annex







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