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The Sentry
War crimes shouldn't pay



Timber for the Taking

How Central African Republic's Forestry Sector Has Fallen Prey to Corruption and Neglect

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Executive Summary

The Congo Basin is the world's second largest rainforest and its largest net carbon sink. It is home to one in five of Earth's living species[1] and the producer of up to half the region's precipitation, delivering moisture as far away as the Sahel and Egypt.[2] The Central African Republic (CAR) is one of six countries spanned by this critically important rainforest.[3] Forests cover two thirds of the land in CAR,[4] contributing an outsized value to the economy in export revenue[5] and providing food, medicine, shelter, and fuel for millions of people.[6, 7, 8] Sustainable management of these resources is therefore critical to the country's ongoing development and the wellbeing of its population. To that end, the country's Forest Code and supporting laws set out rules to ensure the sustainable exploitation of forests with benefits for local communities and the broader population.[9]

Yet The Sentry's investigation found that the country's commercial forestry sector has become vulnerable to the same patterns of state capture and chronic regulatory neglect that have affected CAR's security and mining sectors: politically connected foreign companies acquire valuable public assets while legal safeguards go unenforced.[10, 11, 12] These companies routinely break promises to build processing facilities, clinics, and schools in exchange for logging a community's nutrient-bearing, commercially valuable trees, and the revenues that should flow to the state and communities instead leave the country, depleting the resource while building little domestic capacity or value.

Two of CAR's largest forest concession holders illustrate this dynamic in stark form. Russia's Wagner Group, supplanted by Africa Corps elsewhere in the region, maintains strong independent political and financial positions in CAR. Beginning when it entered the country in 2018, the Wagner Group turned to mining and industrial logging to help fund its operations, including the war in Ukraine.[13] The group continues to hold its timber assets and generates substantial revenues from other valuable holdings in CAR, all while wielding considerable political influence.[14, 15] Meanwhile, China dominates industrial logging across much of the Congo Basin, and CAR is no exception. Chinese firms represent not only Africa's largest timber buyers—with roughly 60% of African wood shipped to China[16, 17]—but also some of its largest owners, with many large Chinese companies holding concessions in West and Central African forests.[18, 19, 20, 21] Rather than investing in domestic processing capacity, these firms largely export raw logs directly to Chinese factories.

The Sentry investigated six of CAR's 14 commercial forest concessions, called *Permis d'Exploitation et d'Aménagement* (PEAs), which together account for nearly 40% of the country's commercial logging area.[22] Four of these PEAs were owned by one of China's largest timber groups active in the Congo Basin before being quietly transferred to a different Chinese company. Two other PEAs are linked to the Wagner Group: one is held by Bois Rouge, and the second is held by the Forest Consulting Company (FCC), which the CAR business registry has listed as being owned by the same Chinese timber group that previously owned the four PEAs.[23]

The investigation identified four principal findings:

First, Bois Rouge and FCC, both linked to the Wagner Group, each acquired a PEA despite no apparent experience in the forestry sector. Both companies continue to retain these valuable concessions, even as they appear to have committed numerous serious violations of the Forest Code and other CAR laws. Apparent violations include misrepresenting their real ownership during the concession bidding process, failing to pay millions in forestry taxes, conducting unlawful logging, and being inactive for more than one year. Members of a directly affected community further allege that Bois Rouge committed labor violations and failed to deliver promised benefits, including employment and community infrastructure. In September 2023, the United States (US) blocked Bois Rouge pending investigation,[24] shortly after which the company appears to have ceased operations.[25] In March 2024, the US completed its investigation and announced sanctions on Bois Rouge, citing the company's ties to the Wagner Group.[26] Shortly after, in June 2024, the United Kingdom (UK) also sanctioned Bois Rouge and an associated alias for ties to the Wagner Group.[27] FCC remains unsanctioned as of this report's release. Neither Bois Rouge nor FCC responded to The Sentry's requests for comment.

Second, a Chinese multinational timber company—Vicwood Group Limited, Hong Kong (Vicwood HK) and its affiliates ("Vicwood Group")—transferred ownership of four PEAs in a manner that may have been intended to circumvent the law that prohibits the sale or transfer of PEAs, apparently with little knowledge or scrutiny from CAR officials. In mid-2023, Vicwood Group appears to have transferred all four of its PEAs to Chinese timber group Zhejiang Great Luck and its affiliates ("Great Luck") by selling the ownership of its four PEA-holding subsidiaries: Vicwood Centrafrique (VICA), Thanry Centrafrique (TCA), Société Forestière de la Kadéi (SOFOKAD), and Société Industrielle Forestière Centrafricaine et d'Aménagement (SINFOCAM). A high-level source who was involved in the transaction stated that to get around the law barring PEA-holding subsidiaries from being sold, Vicwood had transferred its controlling ownership of the respective subsidiaries.[28] According to a CAR legal professional with forestry expertise, Article 31 of the Forest Code clearly prohibits the sale or transfer of a PEA.[29, 30] Several of the former Vicwood subsidiaries appear to have been in longstanding breach of other

Forest Code laws, including failing for more than 20 years to build a sawmill to process their logs and exporting quantities that vastly exceeded the legal maximum. Moreover, when Vicwood bid to acquire its fourth PEA in 2014, it did so in apparent violation of the Forest Code article that bars companies in possession of 300,000 hectares* (ha) from bidding on new PEAs.[31] Such resource acquisition limits are generally intended to promote competition, prevent a single company from becoming overly dominant,[32] and specifically guard against concentration in the hands of a foreign concessionaire,[33] who would not only capture disproportionate revenues from a country's forests but also repatriate those revenues abroad rather than reinvesting them domestically.[34] Vicwood Group and Great Luck did not respond to The Sentry's requests for comment.

Third, The Sentry observed repeated failures to enforce forestry laws. As noted, authorities have not penalized Bois Rouge, FCC, or any of the Vicwood Group's former PEA-holding subsidiaries despite the serious violations described. Millions of dollars of forestry taxes that forest companies should have paid have not been collected or have not been reported to auditing authorities.[35] Officials apparently seldom enforce the laws that restrict log exports to no more than 30% of a company's exported timber[36, 37, 38] and require companies to build a timber processing unit, such as a sawmill, on the PEA: approximately 85% of CAR's annual timber exports are in unprocessed log form,[39] and six of CAR's 14 PEAs had no processing unit as of 2024.[40] These laws are intended to encourage domestic investment and job creation in CAR before its resources are exported. The pattern of low enforcement, resulting in missed opportunities to collect revenue and grow capacity, suggests a mix of chronic neglect and—in the case of Wagner and its linked companies—state capture.

Fourth, internationally protected timber species harvested from Vicwood and other companies' forest concessions have entered international supply chains,[41] despite the fact that CAR has not implemented the requirements of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) intended to ensure that such trade does not threaten the species' survival. Specifically, CAR has published export quotas for CITES Appendix II-listed timber species[42] and authorized over 1,000 export shipments[43] without having first prepared the non-detriment finding study (NDF) that CITES requires.[44] As a result, forest companies, including Vicwood Group and Great Luck, have for years exported internationally protected timber species without the scientific determination needed to demonstrate that the trade will not harm the species' survival. This is concerning both for the long-term conservation of the species and for importing countries' ability to determine whether their imports comply with their obligations under the Convention.

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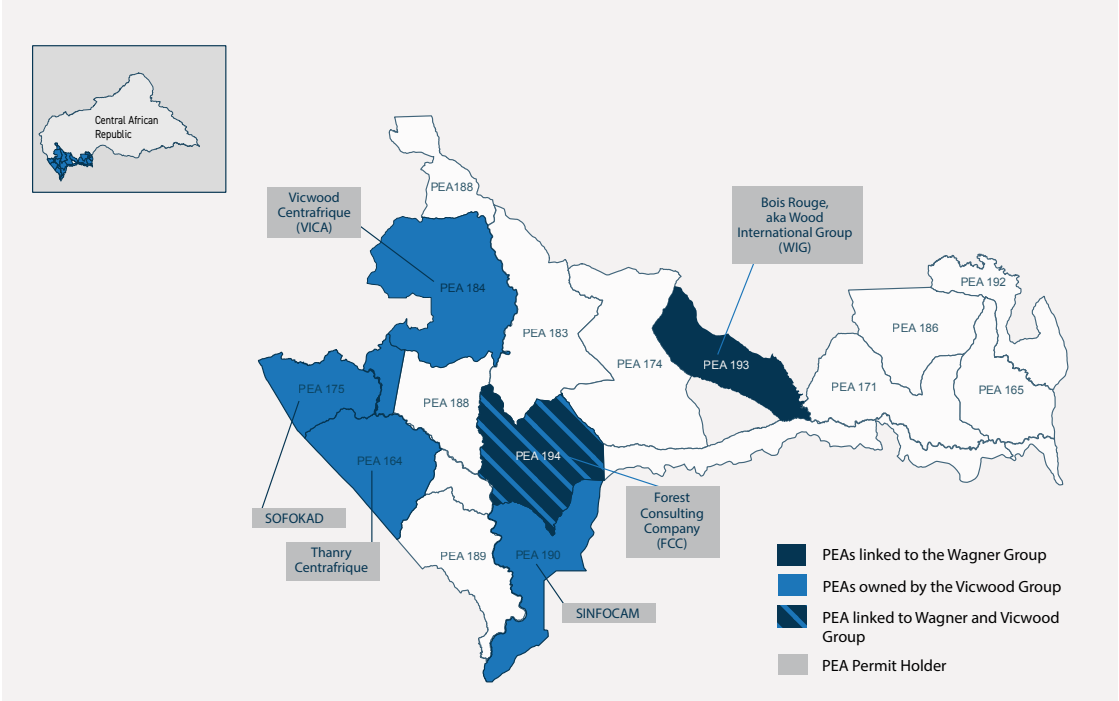
* One hectare is equal to 10,000 square meters or 2.47 acres.

Taken together, these findings suggest that parts of CAR's forestry sector have become vulnerable to the same dynamics of state capture that The Sentry has documented in the country's security and mining sectors.[45, 46] Politically connected actors appear able to acquire and retain valuable public assets despite apparent legal violations, while weak oversight and limited enforcement allow commercial interests to prevail over the rule of law. The result is not only the loss of public revenue and economic opportunity but also the depletion of forest resources, broken commitments to forest communities, weakened public institutions, and the continued flow of timber of uncertain legality into international markets.

Key recommendations

- **The CAR Forestry Code should be fully enforced and updated** to include a private right of action and ensure that the individuals and entities that own and control forestry concessions are fully identified and vetted, adhere to performance requirements, and protect the interests of the people of CAR and the environment.
- **The EU should consider changing the European Deforestation Regulation Country Classification for CAR from low to standard risk** given the number of irregularities in the CAR timber sector, the presence of sanctioned actors, and the opaque data environment.
- **All jurisdictions should exercise enhanced due diligence on wood from CAR**, investigate CAR timber shipments that appear to violate applicable laws, and identify individuals and entities involved in the timber industry that appear to be connected to sanctioned persons.

Wagner's Forests: From Military Support to Natural Resource Access*



View of the 14 PEAs in southwest CAR. According to CAR PEA and business registry documents, five of these PEAs belonged to the Vicwood Group, though ownership of at least four was seemingly transferred to another Chinese timber company. Two are linked to Russia's Wagner Group, including one of those owned by the Vicwood Group.

The Wagner Group has operated in CAR since 2018, when President Faustin-Archange Touadéra, facing persistent insecurity and struggling to consolidate control, invited Russia to deploy personnel to provide security assistance, train the country's armed forces, and help defeat armed opposition groups.[47] Wagner supported the Central African Armed Forces to help the government regain territory, in the process repeatedly incurring accusations of committing serious human rights abuses, including torture, ex-

* Reports by The Sentry are based on interviews, documentary research, and, where relevant, financial forensic analysis. In some cases, sources speak to The Sentry on the condition that their names not be revealed out of concern for their safety or other potential retaliatory action. The Sentry establishes the authoritativeness and credibility of information derived from those interviews through independent sources, such as expert commentary, financial data, original documentation, and press reports. Prior to publication, The Sentry endeavors to contact the persons and entities discussed in its reports and afford them an opportunity to comment.

trajudicial killings, rape, and attacks on civilians.[48, 49] In return for these security and training services, Touadéra's administration granted Wagner access to lucrative natural resource assets, particularly mining concessions in areas the group had helped recapture.[50] Through companies including Diamville, Lobaye Invest, and Midas Resources, Wagner established a diamond trading business, secured mining rights in and around the Lobaye forest, and obtained control of Ndassima, the country's only industrial-scale gold mine.[51, 52] Touadéra has reportedly maintained a close relationship with Wagner officials, reflected in the group's continued role in his personal security and his reported resistance to Moscow's efforts to replace the group with the more state-backed Africa Corps.[53, 54]

Bois Rouge wins a forest concession

Against this backdrop, CAR authorities in 2020 launched a public tender for a 186,000-ha forest concession in Lobaye Prefecture.[55] Two companies submitted bids: an established forestry operator and Bois Rouge,[56] a newly incorporated company[57] that had no prior forestry experience. Bois Rouge did, however, have multiple links to the Wagner Group, as detailed below. Meanwhile, Wagner was supporting military operations in Lobaye against rebel groups and helped government forces recapture the strategic town of Boda in January 2021.[58] The concession award thus coincided with Wagner's expanding military presence and growing commercial interests in the region.

Bois Rouge won the concession award for PEA 193 on February 9, 2021, based on its vastly higher bid of 640 Central African CFA francs (FCFA) ($1.09) per hectare versus the competing bid of 50 FCFA ($.08) per hectare.[59, 60] Bois Rouge's concession contract, signed by the president, was published in December 2021.[61]

HIDDEN OWNERSHIP AND A COMPROMISED BID PROCESS

During the bidding process, Bois Rouge presented itself as a Central African company, with CAR nationals Anastasi Naneth Yakoima and Bienvenu Setem listed as the company's representatives in bidding documents[62] and Yakoima as the signatory on Bois Rouge contracts.[63]

In reality, the company had multiple links to the Wagner Group. Setem worked for Dmitri Sytyi,[64] who was sanctioned by the US in September 2020 for his connection to Wagner.[65] Sytyi was also the founder of Wagner-linked US- , UK-, and EU-sanctioned Lobaye Invest,[66, 67, 68] the head of the Russian cultural center in Bangui ("Russia House"),[69] and a trusted advisor of Touadéra.[70] Bois Rouge's commercial director, Artem Tolmachev, appeared at a global timber supplier conference on behalf of Bois Rouge and has worked for at least two other Wagner-linked companies.[71] Bois Rouge imported logging tractors and other equipment more than 80 times from Broker Expert LLC, a company based in Saint Petersburg and controlled by Wagner Group founder Yevgeniy Prigozhin.

Broker Expert LLC has also supplied equipment to other Wagner Group companies and was sanctioned in March 2024 for its support of Prigozhin and Wagner activities.[72, 73, 74]

The independent observer assigned to evaluate Bois Rouge's bid told The Sentry that he carried out background checks on Bois Rouge and its personnel as part of the required evaluation report, verifying the company had a CAR-based bank account in good standing and seeking disqualifying adverse information—such as criminal activity—both in domestic and international media. He stated that Bois Rouge did not disclose any ties to Russians and that he did not learn that the real owners of Bois Rouge were Russian until weeks after the award was granted. He did not think the true Wagner Group owners would have met the moral character eligibility requirement laid out in Article 36 of the Forest Code.[75] According to a CAR legal professional, an omission of affiliation could be considered fraudulent declaration. Moreover, by law, a deliberate false declaration by the bidder that could influence the award should trigger the cancelation of the PEA award.[76, 77]

EXCEPTIONAL TREATMENT BY THE STATE

Bois Rouge benefited from exceptional treatment by the state, including an unprecedented deferral on paying three years of land taxes up front, other tax benefits, and apparent exemption from producing an approved forest management plan.

The Forest Code and supporting PEA regulation require PEA bidders to pay three years of land taxes within 15 days of the PEA being awarded, or the PEA shall be revoked.[78, 79] Based on its bid, Bois Rouge was required to pay approximately 512 million FCFA (over $900,000) by February 25, 2021.[80, 81, 82] This payment obligation was also included in Bois Rouge's PEA award in February 2021.[83] However, by the time the final contract was published and signed in December 2021, CAR's minister of finance and budget had granted Bois Rouge an unprecedented exception to paying that sum, alongside other tax advantages. In a letter signed April 23, 2021, and appended to the PEA contract, the finance minister granted Bois Rouge several delays on the land tax payment, extending the payment date to April 1, 2022.[84] A separate letter on the same date from the finance minister granted other tax exemptions—including from property tax on new construction, business taxes, and deferred value-added tax (VAT) on imported equipment—and reduced social taxes by 25%.[85] The Ministry of Finance did not respond to The Sentry's request for comment.

After a company has been awarded a PEA, it signs a provisional contract with the Ministry of Water, Forests, Hunting, and Fishing (MEFCP), and only then can the company begin forestry operations.[86] The Forest Code requires the company to prepare a forest management plan within three years of award, including an environmental impact study,[87, 88] and in the interim, the company is restricted to operations on a temporary cutting parcel defined in the provisional contract and normally restricted to one eighth

of the PEA territory.[89, 90] Once the company has developed a forest management plan and the MEFCP has approved it, the parties can sign a final contract.[91, 92] The forest management plan is key for governing the logging activities on the PEA over a 25- to 35-year period, based on the duration of a forestry cycle,[93] and is the basis for more detailed annual plans and inspection documents. While The Sentry was unable to obtain the provisional contract for Bois Rouge, apparently signed April 28, 2021, an investigative report states that it granted Bois Rouge permission to exploit the entire surface area, rather than one eighth.[94] Bois Rouge's signed concession contract was published in December 2021, a mere eight months later, and, unlike all other PEA contracts in force at the time, was the only one that did not reference an approved forest management plan.[95] According to one investigative report, Bois Rouge did not provide this management plan, but authorities signed the final contract anyway.[96] The MEFCP also does not appear to have held Bois Rouge to the legal requirement to carry out an environmental impact study prior to signing the final contract.[97] The MEFCP did not respond to The Sentry's request for comment.

LAWLESS LOGGING

The irregularities and favorable treatment did not stop once the PEA was awarded: Bois Rouge's noncompliance with the Forest Code persisted throughout the logging process itself.

Bois Rouge began its operations on PEA 193 by December 2021,[98] though one investigative report claimed activities began as early as July.[99] From the outset, Bois Rouge lacked a forestry plan and ignored forestry norms and requirements. The government consistently failed to hold the company to legal standards. Bois Rouge cut trees in clusters close together—rather than selectively logging and leaving sufficient mature, seed-bearing trees standing—and did not mark felled trees with the legally required hammer mark, according to a forestry expert who visited the site.[100] One former worker hired by Bois Rouge described witnessing some 3,000-4,000 trees cut and abandoned in the forest, allegedly because the company intended to and then was unable to build a bridge to facilitate the evacuation of the timber.[101] Abandoning trees without valid justification is also a violation of the Forest Code.[102] These violations could take place all the more easily because no inspector from the MEFCP was on site to document compliance, according to the forester and a former forestry auditor.[103, 104] The former auditor confirmed that PEA 193—as well as the other Wagner-linked concession, PEA 194, discussed later in this report—was unique in having no inspector stationed at the site.[105]

Bois Rouge also appears not to have adhered to forest labor standards and potentially the labor code. Former employees reported being beaten for taking breaks, being asked to work every day of a month with no days off,[106] working in the rain,[107] and not receiving compensation for medical care if injured on the job.[108] Bois Rouge's con-

tract did not prohibit logging in rainy weather, which one report cites as different from other PEA contracts; the same report mentioned unusual working conditions, with longer hours and more logging per day.[109] A former employee also reported that people seeking employment with Bois Rouge were required to provide a gift to the recruiters, typically a goat.[110] Bois Rouge never built a base camp (*base vie*)—the site where the forestry inspector would be stationed[111] and where other facilities that benefit the community, such as a clinic, would be built[112]—though it had promised such benefits in its bid[113] and its contract required contributing to health and other infrastructure development on its PEA.[114]

Table: Legal requirements for bidding on and awarding a PEA (not exhaustive)

Description	Law/Article
Forest Ministry creates Bid Commission for attributing a PEA; Commission includes an independent observer	Forest Code Articles 36, 37 Decree N° 09-118 Articles 6-8,
Commission posts public tender for a PEA	Decree N° 09-118 Articles 19, 20
Companies submit bids	Decree N° 09-118 Articles 21-25
Commission determines eligibility of bid submissions, including the following criteria: • Bidder submission contains commitment to prepare a forest management plan • Bidder and shareholders pass background checks on affiliations and moral character	Forest Code Articles 36, 39 Manuel de Procédures de mise en concurrence pour l'attribution de nouveaux permis d'exploitation et d'aménagement (PEA)115, 3.1.2.3 (a), and 6.1
Commission evaluates and scores bids	Decree N° 09-118 Articles 33-39
PEA award decree published	Manuel de Procédures, 7.6
Awardee must pay three years of land tax or PEA is revoked; this sum must be paid within 15 days of award	Forest Code Article 189 Decree N° 09-118, Articles 25 and 44
Provisional contract signed within three months of the PEA award Provisional contract specifies a temporary cutting parcel (assiette de coupe provisoire) where logging is permitted, pending the final contract with approved forest management plan	Forest Code Article 107 Decree N° 09-118 Article 27
Awardee has three years to prepare a forest management plan and environmental impact study	Forest Code Article 107 Decree N° 09-118 Article 27
Final PEA contract with approved forest management plan published within three years of the provisional contract signature	Forest Code Articles 41, 103, 107

WORKERS AND COMMUNITIES BEAR THE COSTS

Bois Rouge located its logging and recruitment operations in and around Banga village, Lobaye Prefecture, directly affecting a community whose livelihoods are closely tied to the surrounding forest. Residents told The Sentry that they depend on the forest for timber, fuel for cooking, material for building shelters, medicinal products, and fertile soil for farming. They also rely on particular tree species, such as sapelli, sipo, and kosipo, to harvest caterpillars that provide an important source of food and income.[116]

Community members, including some residents who had been employed by Bois Rouge, told The Sentry that the company cut down trees regardless of their age, diameter, or basic forestry management practices, in contrast with the practices of the concession's previous owner. They told The Sentry that Bois Rouge cut down and then abandoned thousands of trees in the forest, another seeming violation of the Forest Code. Residents were particularly critical of the destruction of trees used for caterpillar harvesting, which they said occurred without prior consultation or adherence to logging standards.[117]

Community members also expressed disappointment that Bois Rouge failed to deliver infrastructure it had proposed in its bid, such as a clinic, school, and/or wells. At the same time, community members and former employees acknowledge that the company brought some short-term positive economic benefits, including job training, employment opportunities, and wages allowing workers to purchase basic necessities.[118] Those benefits, however, were accompanied by extensive forest damage and the loss of resources on which the wider community depended.

HOW BOIS ROUGE TIMBER REACHED INTERNATIONAL MARKETS

All the wood that Bois Rouge logged and exported from PEA 193 was processed at its timber yard and sawmill located on Wagner's military base near Boda, according to shipment data and confirmed by human sources.[119, 120, 121, 122] Processing at this level is quite unusual in CAR, which—despite the law capping unprocessed log exports at 30%—exports approximately 85% of its timber as logs.[123] A plausible explanation for this practice is that, as previously noted, Bois Rouge did not hammer-mark its logs as legally required and may have intended to avoid scrutiny of its merchandise by roadside passersby. Logs transported within CAR and through Cameroon travel on flatbed trucks, fully visible to the public for the entire journey to the Cameroonian ports of Douala or Kribi. Such trucks—along with the log markings referencing names of companies, species, and the parcel where the wood was cut—are a common sight on Cameroon's roads.

Possible area logged by Bois Rouge

Measuring tree loss from both legal and illegal logging in tropical areas is challenging because detection tools often rely on optical imagery, which can be obscured by cloud cover—a frequent problem in a region that receives an average of 300 days of rain per year. However, by layering multiple sources, The Sentry may have identified an area and time period during which Bois Rouge was logging in PEA 193.

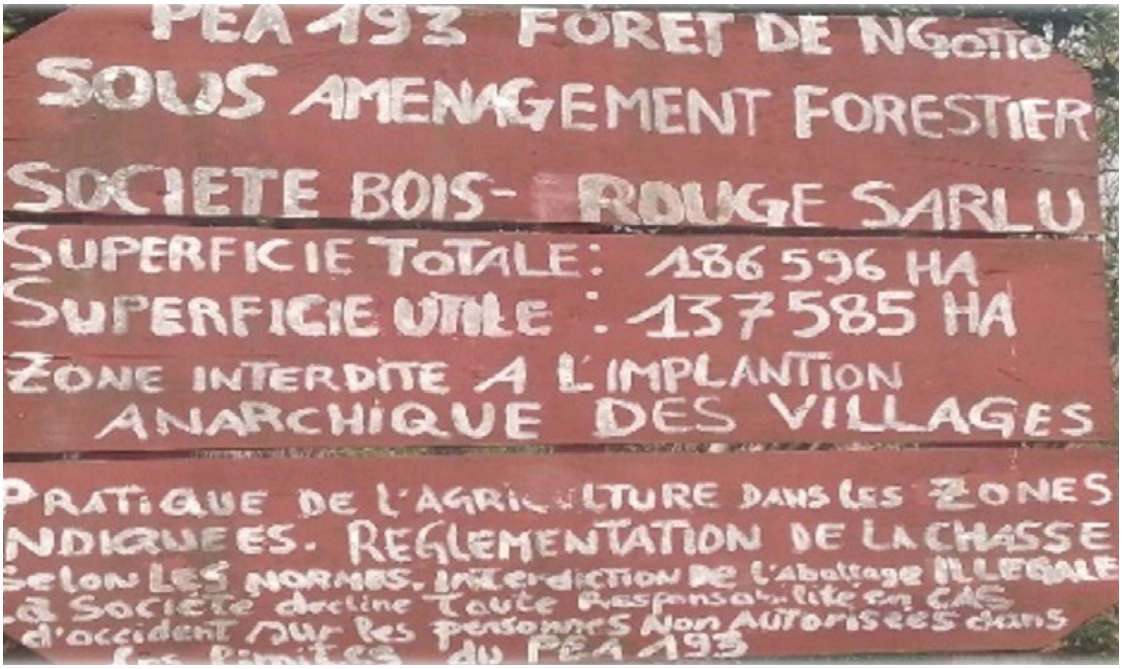
Testimony from the Banga community, cross-checked with Global Forest Watch and Planet satellite imagery, revealed what appears to be a cluster of tree loss along and around logging roads of approximately 29 square kilometers (km^2), or 2,900 ha,[124] in an area just south of Banga. The Sentry estimated visible tree loss as 0.34% of this area, amounting to roughly 9.7 ha or 486 trees, yielding approximately 1,186 cubic meters (m^3) of wooden boards.[125, 126, 127, 128, 129, 130, 131] This tree loss appears to have occurred between March and August 2023, a period when Bois Rouge was still active and heavy rains were common.



Area near Banga village in PEA 193, before and after apparent logging activity, March-August 2023. Source: Planet.



Residents point out sites of trees cut by Bois Rouge near Banga Village, Lobaye, 2025. Photo: The Sentry.



A sign located in PEA 193 stating that the area is under the management of Bois Rouge. December 2025. Photo: The Sentry.

According to multiple truck drivers who hauled these timber shipments, Bois Rouge shifted to loading sawn boards into containers before trucking them to Cameroon at some point after May 2023, possibly due to international media exposure showing photos of the trucked timber.[132, 133] Timber concealed inside closed containers would have been shielded from public view.



Trucks carrying logs from CAR, near Garoua-Boulaï, Cameroon, in September 2025. Source: The Sentry

CAR law states that all timber exports must be accompanied by an export permit,[134] which must be presented at border controls.[135] Between 2020 and 2025, these export permits could only be generated by LegalTrace, the electronic tracking system used by MEFCP's contracted auditor, Société Générale de Surveillance (SGS).[136, 137, 138] According to a former SGS timber auditor, LegalTrace would issue an export permit only after Ministry inspectors had approved documents certifying that the concession complied with applicable forestry laws. Yet despite apparent noncompliance, including unpaid taxes and logging without an approved forestry management plan, Bois Rouge appears to have obtained inspector-approved documentation needed for LegalTrace to authorize its timber export.[139] SGS did not respond to The Sentry's request for comment.

According to an audit report prepared in 2024, SGS verified that Bois Rouge produced a total of 9,009 m^3 of timber between 2022 and 2023.[140] The Sentry identified 157 shipments of timber accounting for 8,414 m^3 of this volume, consisting almost entirely of declared sawn sapele.[141] The shipments weighed approximately 7,140 tons,* had an estimated value of about $2 million, and were exported to nine countries.[142]

* All weights in this report are cited in kilograms (kg) and metric tons (tons). 1,000 kg = 1 ton.

By April 2022, Bois Rouge had begun exporting timber shipments to Europe, with shipments to Denmark and France.[143] When asked about these shipments, the French importers denied having imported from Bois Rouge at all, while the Danish importers claimed a breach of internal processes.[144] From August 2022, however, most timber shipments had shifted to China, Turkey, and Pakistan,[145] markets that generally impose less stringent due diligence requirements than the EU when it comes to the legality of timber imports.[146, 147]

The Sentry obtained a photo of Bois Rouge timber for sale in 2025 at the store of one of its most frequent clients, China Kunte.[148]



Bois Rouge boards for sale in the China Kunte store in Dong Guan, Guangdong Province, China. Photo taken in 2025. Photo owner: The Sentry.

SANCTIONS APPEAR TO DISRUPT OFFICIAL EXPORTS

In June 2022, The Sentry was among the first organizations to highlight Bois Rouge's possible link to Wagner,[149] and media reports corroborating the connection soon followed.[150, 151] A few months later, in November, Bois Rouge officially changed its name to Wood International Group SARLU (WIG)[152] and continued to send shipments under that name.[153] On September 14, 2023, the US designated Bois Rouge and its alias, WIG, placing the companies on the Specially Designated Nationals (SDN) List.[154] The US Department of the Treasury publicly detailed the basis for the designation on March 8, 2024, as part of a broader action targeting Wagner-linked companies in CAR.[155] Shortly after the US designated Bois Rouge/WIG in September 2023, exports under both names ceased, with the last known timber shipment under WIG departing Cam-

eroon on October 9, 2023, three weeks after the initial designation.[156] However, as of 2025, a forestry map displayed in the MEFCP office labeled PEA 193 as attributed to Société Industrielle Forestiere (SIF),[157] indicating a possible second name change by Bois Rouge/WIG. A 2025 report by the Extractive Industries Transparency Initiative (EITI), produced with input from CAR authorities, also referred to PEA 193 as attributed to "Société Industrielle Forestiere (ex-Bois Rouge)," while citing production and taxes collected for 2023—a year during which the company was officially using the WIG name.[158] The Sentry did not find any record of a name change or sale of PEA 193, nor could it find a company by this name in the corporate registry; however, two forestry experts in CAR confirmed the new name.[159, 160] The name change to SIF does not appear to have taken place officially, and The Sentry did not identify any shipments made under this name in trade records.

Bois Rouge/WIG appears to have sought other methods and channels to export, most of which were unsuccessful. A current forestry expert in CAR told The Sentry that he observed at least one Bois Rouge/WIG attempt to transport its timber eastward through CAR, potentially heading for ports in East Africa.[161] Both he and another forestry expert asserted that such a route is neither logistically nor economically viable due to the poor road infrastructure and long distances.[162, 163] In another instance, after the sanctions, a representative from Bois Rouge approached a Chinese forestry company to ask for help exporting cargo but was turned down, according to both an insider at the relevant Chinese company and a CAR forestry expert.[164, 165]

After the US imposed the initial sanction designation, an additional 19 containers of timber may have been shipped on behalf of Bois Rouge from October 2023 to May 2024. Twelve of these were shipped by some of Bois Rouge's frequent intermediary trading partners: China Kunte and Maya Consulting.[166] The Chinese company China Kunte bought timber directly at least 17 times from Bois Rouge/WIG between December 2022 and September 2023, making it one of the most frequently identified clients.[167] According to trade records, in August 2023, Maya Consulting shipped at least 42 containers of timber on behalf of WIG to China.[168, 169, 170] Maya Consulting also previously imported goods at least 12 times for a company whose name, address, and goods traded appear to link it to Wagner-linked activity in CAR.[171, 172, 173, 174, 175] An additional seven shipments from Standard Export Limited were shipped on behalf of Bois Rouge in April and May 2024, according to a recent report by the nongovernmental organization the Global Initiative Against Transnational Organized Crime (GI-TOC).[176]

A second Wagner-linked concession

In August 2022, FCC—another Wagner-linked company—acquired the forest concession PEA 194.[177] According to the CAR business registry, FCC was owned by SINFO-

CAM, a subsidiary of Chinese timber conglomerate the Vicwood Group, which is discussed in more detail later in this report.[178] As with Bois Rouge, FCC had no prior forestry experience and presented itself as having a Central African director, a person named Mathilde Joceline Kainozo Malba.[179, 180] However, the CAR business registry lists Stephen Chong, Vicwood Group managing director, as a representative for FCC, not Kainozo Malba.[181]

According to sources—including three individuals who spoke with The Sentry, an SGS audit report, and an investigative report by GI-TOC that includes bank account information—FCC is understood to be another Wagner-controlled company falsely presenting as a CAR company.[182, 183, 184, 185, 186] The SGS report identified both PEA 193 and PEA 194 as belonging to WIG, the aforementioned Bois Rouge alias.[187] Financial records mirror this picture. The report detailed some 800 million FCFA ($1.4 million) in missing land taxes for FCC as of March 2024.[188] Based on that figure, FCC is likely to have bid 700 FCFA/ha ($1.2/ha), an amount similar to the one offered by Bois Rouge.[189] A former SGS auditor told The Sentry that to his knowledge, FCC had still not paid any taxes as of 2025.[190]

FCC's contract terms also mirror the preferential treatment extended to Bois Rouge. Like Bois Rouge, FCC's provisional contract includes a letter from the minister of finance dated August 30, 2022, granting a two-year delay for the land tax award that would normally be paid within 15 days of the PEA award.[191] A second letter from the minister dated October 28, 2022, waives both VAT and customs duties on all FCC imports.[192] The Sentry was not able to identify a final contract for FCC. According to The Sentry's sources and supported by satellite imagery, FCC has been entirely inactive as a forestry company, with no logging activity recorded on or observed at PEA 194 as of this report's release. According to the Forest Code, a PEA that has been inactive for one year is subject to cancelation.[193]

While inactive on its PEA, FCC did import goods in February 2024 and January 2025 that were unrelated to logging but potentially related to the Wagner Group's mining and beverage businesses in CAR: argon, flocculant (used for mining), 20,000 liters of ethyl alcohol, and printed material from a bottling equipment supplier.[194, 195, 196] These shipments presumably would not have been subject to import taxes, given FCC's exemption to them.

A potential Wagner-China connection: Further attention warranted

Speaking anonymously to The Sentry, a high-level employee for a Chinese forestry company in CAR in 2025 stated that some aspect of the company's CAR operations had at one point been "handed over to the Russians," who subsequently withdrew because they felt they were losing money.[197] This source and three others told the Sentry that Chong and the Vicwood Group had been experiencing financial difficulties.[198, 199, 200, 201] The Sentry could not independently corroborate the nature and extent of this arrangement at the time of writing, and further investigation is warranted.

The cost to the state and forest communities

Three main forestry taxes—felling taxes, reforestation taxes, and land rental tax[202]—make up approximately 4% of national revenues annually.[203] Additionally, by law, 30% of felling taxes and 25% of reforestation taxes collected by the state must be paid to local forest communities into a community development fund to support needs such as building health and education facilities and improving roads,[204, 205] though interviewees from these communities suggested these payments do not always reach them.[206]

A forestry audit prepared by SGS shows that Bois Rouge/WIG owed 635 million FCFA ($1.09 million) in land rental tax in 2023. According to that document, SGS could not verify payment of any of the 1.02 billion FCFA ($1.8 million) that Bois Rouge owed for 2021-2023 in land and felling taxes as well as export duties.[207] As a reference point, $1.8 million is equivalent to 1% of CAR's total tax revenue in 2022.[208] A former SGS auditor stated that to his knowledge, Bois Rouge never paid any taxes.[209] The EITI, which seeks to provide insight into natural resource revenues, appears to have encountered similar difficulties confirming these payments, highlighting discrepancies between reported and verified payments, in particular between the tax collection agency (Direction Générale des Impôts et des Domaines, DGID), the Department of Forests and Water (DGEF), and the forest companies themselves. The EITI's 2022 report for CAR shows the DGEF reported that, in theory, Bois Rouge had paid 635 million FCFA ($1.09 million) in rent tax, but the DGID confirmed receiving just 35 million FCFA ($.06 million). This is equivalent to approximately 7% of what Bois Rouge owed, per its PEA award, and only 20% of one year's rent tax.[210, 211, 212] As Bois Rouge did not report any payments to the EITI,[213] the report only considered the 35 million FCFA as verified.[214, 215]

In its winning PEA bid submission, Bois Rouge committed to providing infrastructure in local communities, such as a well, clinic, or school.[216] Interviews with a community in Banga directly impacted by Bois Rouge's activities confirmed that they did not receive those expected benefits.[217] A current MEFCP official separately confirmed that Bois Rouge had not built expected facilities meant to benefit the community.[218] Moreover, by not paying felling taxes, Bois Rouge also did not contribute to community development funds.

Since FCC has neither harvested nor exported any timber from PEA 194, according to audit records, it neither owes nor pays any felling or reforestation taxes. The inactivity of the PEA is itself a failure to generate state and community development revenues.

Authorities may be reluctant to enforce laws on the Wagner-tied companies given Wagner's relationship with Touadéra. A current forestry official told The Sentry, "If you ask the Russians to pay their land, felling, or reforestation taxes, they tell you to go speak with the President."[219]

Grounds for cancelation but no enforcement

At many points, the PEAs for both Bois Rouge and FCC could have been subject to cancelation in accordance with CAR's Forest Law, resulting in the concession area being returned to the state. Violations include: failing to pay the bid award fee within 15 days of the award; failing, at least in Bois Rouge's case, to submit forest management plans for approval; concealing the companies' true beneficial ownership; apparently failing to pay the bid award fee at the end of the grace periods granted by the finance minister to each company; and allowing each PEA to remain inactive for more than one year. Bois Rouge and FCC have been inactive on their PEAs for at least two and four years to date, respectively, but the government has been reluctant to repossess these PEAs. Based on a review of past PEA repossession decrees, repossessions appear to require the president's approval,[220, 221, 222] and Touadéra may not wish to antagonize the Wagner Group, which he wants to remain in CAR at a time when the Russian government seeks to replace it.

Chinese Control of CAR's Forests

For over a decade, China has dominated the harvest, import, and processing of Congo Basin timber. In 2014, China was the destination for more than three quarters of Africa's timber exports.[223] China and Vietnam are the two largest markets for CAR's timber.[224] One Chinese timber conglomerate, the Vicwood Group, has had a particularly outsized influence in the Congo Basin. Beginning in 1997, the group acquired most of the forest subsidiaries and assets belonging to what had previously been Cameroon's largest forest holder, the French timber company Thanry.[225, 226, 227] By 2008, Vicwood was the largest logging contractor in Cameroon.[228] At its peak, Vicwood—primarily through its subsidiaries—was the top concession holder in both CAR and Cameroon and also held a 461,000-ha concession in the Republic of Congo (RoC).[229]

From approximately 2004 to 2023, Vicwood acquired and then controlled over 1 million ha of forestland in CAR—equal to 25% of the country's productive forests—through four PEAs awarded to its subsidiaries:[230] VICA (PEA 184);[231] Société Forestière de la Kadei (SOFOKAD) (PEA 175);[232, 233] Société Thanry Centrafrique SARL (TCA) (PEA 164);[234] and SINFOCAM (PEA 190).[235, 236] The EITI reported that in 2022, Vicwood's companies exported 28,780 m^3 of timber from CAR, weighing nearly 22,000 tons[237]—almost as much as the entire EU imported from CAR in all of 2024.[238] In subsequent years, however, the SGS audit suggested Vicwood was faltering: SINFOCAM, acquired in 2014, appears never to have exported timber; SOFOKAD was recorded inactive by 2023; and TCA and VICA were underproducing in 2024.[239] A CAR forestry professional told The Sentry he was aware that Vicwood companies had been less active in recent years.[240]

The quiet transfer of CAR's commercial forests

This reduced activity coincided with the transfer of Vicwood's PEAs to new owners. The Sentry learned that Vicwood discreetly sold ownership of all four of its forest concessions in CAR in mid-2023 to Great Luck, a different Chinese timber group. According to two sources with high-level knowledge of the company transactions and confirmed by French and Hong Kong registry documents, and as this report describes further below, all four of the PEAs were transferred through the complete handover of PEA-holding subsidiaries.[241, 242]

None of the CAR forestry officials or experts The Sentry spoke with were aware of the sales, raising serious concerns about oversight and enforcement. One official thought that Vicwood had illegally sublet its concession,[243] and two others thought that Vicwood

had recapitalized,[244, 245] but none were aware that ownership of Vicwood's subsidiaries—and by extension, ownership of the PEAs—had been sold and transferred. The Sentry found no CAR documents associated with the PEAs that referenced the new ownership. Relevant CAR registries and documents, as well as international reports on the CAR forest sector, continue to state that the four PEAs are owned by Vicwood HK. For instance, a 2024 environmental impact study on PEA 190 stated that it is owned by the Vicwood entity registered in Hong Kong, though by then the owner was Great Luck.[246] A 2025 World Bank report on the CAR forest and mining sectors continued to reference Vicwood as the owner of the four PEAs.[247] Vicwood HK was dissolved on May 16, 2025, though the CAR registry continued to state that Vicwood HK owned VICA as of September 2025.[248]

HOW THE TRANSFER WAS CARRIED OUT

Based on internal company sources with knowledge of the sale, the Vicwood Group sold all four of its PEA-holding subsidiaries to Great Luck or its affiliated companies.[249, 250] One of these sources explained that to get around the CAR law prohibiting the sale of the PEA title itself, Vicwood had transferred ownership of the companies that held the PEAs.[251] Corporate records for TCA (PEA 164) show how one such transfer took place: Half of TCA shares were owned by the entity Thanry France (France),[252, 253] which was acquired in December 1997 by Vicwood Pacific Limited, represented by Stephen Chong and his father, the founder of Vicwood, Kee Ting Vicwood Chong.[254, 255, 256] On June 30, 2023, Stephen Chong and Kee Ting Vicwood Chong transferred Vicwood Pacific Limited, and with it the ownership stake of TCA and PEA 164, to Huang Jianjun of Zhejiang Great Luck Trading Co., Ltd.[257]

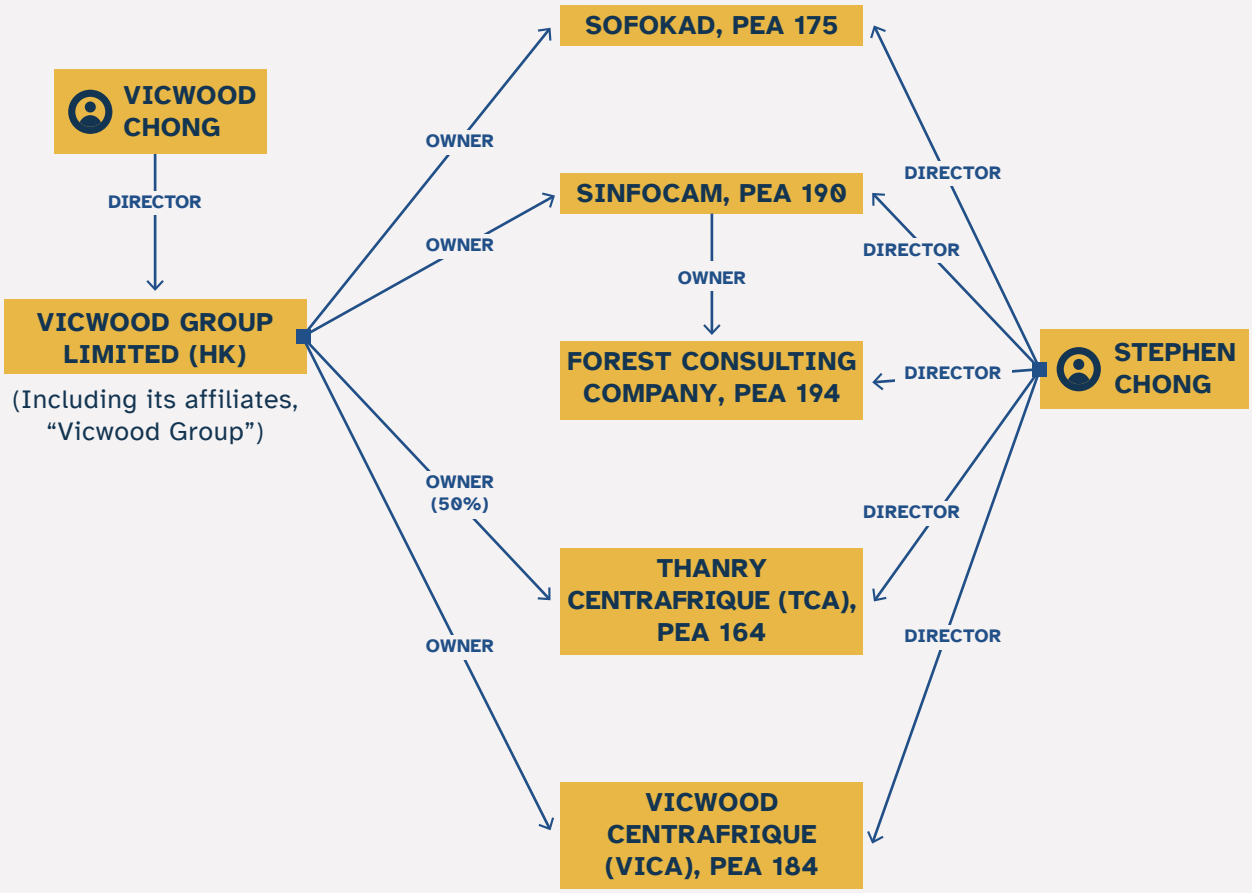
Great Luck recruitment ads and promotional materials appear to confirm these acquisitions. A Great Luck job recruitment ad posted in October 2023 seeks French-speaking Chinese applicants for timber processing positions in Central Africa,[258] and another such post in 2025 specifies that Great Luck and the positions to be filled are based in Bangui.[259] The October 2023 post is accompanied by a promotional video for Great Luck that states, "Welcome to Greatluck Trading Company, Africa's wood processing hub," and flashes the four names of Vicwood's former subsidiaries: TCA, SOFOKAD, SINFOCAM, and VICA.[260]

According to a source with knowledge of one of the Chinese companies involved, Vicwood sold one of the four PEA-holding subsidiaries to Great Luck for just over 10 million yuan ($1.44 million).[261] The same source suggested that Great Luck may have carried out the sale using its US-registered company.[262] The Sentry identified Great Luck Forest Products, LLC, registered in Indiana, with the director Huang Yiming, who is affiliated with Great Luck.[263, 264]

Great Luck specializes in the import of timber and, according to its website, holds

forest concessions in Cameroon, RoC, Gabon, and Equatorial Guinea, where it claims to have the largest wood processing plant to date.[265] Though the website does not state possessions in CAR, it lists the four CAR PEA-holding subsidiaries on its product page.[266, 267] Through its subsidiaries and affiliates—including Hong Kong Great Luck Trade Co., Zhejiang Muming Trade Co., and Great Luck Forest Products LLC—Great Luck imports logs and boards from African countries and North America.[268, 269] Based on trade records, Great Luck, like Vicwood before it, imports almost exclusively unprocessed logs from CAR.[270]

PEA ownership structure based on information in CAR and French records.



Ownership of PEAs 184, 175, 164, 190, and 194. These PEA contracts show the concessions are owned by the Vicwood Group and/or its subsidiary, SINFOCAM. Based on our investigation, we believe the ownership of the PEAs was transferred around June 2023 from the Vicwood Group to Great Luck and/or its subsidiaries.

Since purchasing Vicwood's subsidiaries, Great Luck has been the trader and/or exporter for at least 505 shipments containing 176,000 tons of wood—valued at $42.6 million—from the four PEAs between June 2023 and 2025.[271] Of this total, VICA and SOFOKAD have exported at least 18 shipments—totaling 3,000 tons—to France, Spain, Portugal, Belgium, and the Netherlands.[272]

WHY THE TRANSFER MAY HAVE BEEN DESIGNED TO CIRCUMVENT THE LAW

PEAs are awarded solely through public tenders, and the Forest Code prohibits the sale or transfer of a PEA.[273, 274] This prohibition was confirmed to The Sentry by a CAR legal professional with expertise in forestry law, who said the law bars selling of a PEA or transferring it from one company to another.[275] Yet two high-level managers working for Chinese companies involved in the transfer explained that they conducted PEA sales by transferring the ownership of the PEA-holding companies instead,[276, 277] with one manager stating this was done because it was not possible to sell the subsidiary company holding the PEA itself.[278] This ownership transfer would appear to violate the spirit of the law prohibiting a PEA transfer. It would also appear to violate the public tender process requirement that companies awarded PEAs pass background and morality checks.[279, 280]

The manner in which the PEAs were transferred from Vicwood to Great Luck raises questions about whether such transfers are in accordance with CAR law. It also raises questions for the countries that import timber from these PEAs. The European Union Timber Regulation (EUTR) requires that timber placed on the EU market has been harvested by an entity with the legal "rights to harvest timber within legally gazetted boundaries."[281]

Why the prohibition on sale or transfer of PEAs is important:

The 2008 Forest Code marked the creation of the new national forest management system granting logging titles of public lands to private companies through competitively bid public tenders. The duration of these logging titles is set to a period of full rotation, generally 30 years, supporting long-term, sustainable management[282, 283] rather than incentivizing short-term, rapid cutting of the parcel's most valuable species. Competitive bids favor transparency and scrutiny of the private owners, so officials can assess the competence and reliability of the resource title holders and know who to hold accountable. According to the EITI, the goal of making PEAs nontransferable is to ensure that the

entity granted the concession maintains direct responsibility for the resource's sustainable exploitation.[284]

Prior to the 2008 Forest Code, though it was legally possible to transfer logging titles, the transfer still could not be carried out privately. The 1990 Forest Code required the company ceding its title to obtain ministerial approval and the new company to demonstrate its capacity to manage the logging concession.[285]

REGULATORY FAILURES AND WEAK ENFORCEMENT

Vicwood's discreet sale of the four PEAs was not the first time it appeared to violate CAR's forestry laws in its two decades of operation. When Vicwood bid to acquire the fourth of its PEAs using its subsidiary SINFOCAM, and later when it used SINFOCAM to acquire PEA 194, it did so in apparent violation of the law that bars companies already in possession of 300,000 ha of concessions from bidding on new PEAs.[286] Vicwood has also seemingly failed to abide by the requirement that companies build a timber processing facility, such as a sawmill, within three years of its PEA award. There are no processing facilities on three of its four PEAs—most notably on the VICA PEA, where it has failed for 21 years to build a sawmill to process the timber it cuts for export. CAR law additionally dictates that companies export no more than 30% of harvested timber in unprocessed log form. According to shipping records for the year 2022, almost 9,800 of the 10,780 tons of timber China imported from VICA were in log form, and all of the nearly 2,000 tons Vietnam imported from VICA were in log form[287]. This represents a processing percentage of 8%,[288] a far cry from the legally required 70%. Such processing minimums or log export bans (LEBs) primarily exist to encourage domestic investment and job creation, adding and retaining more value before export.[289] Vicwood exemplified China's strong preference for importing raw logs to be processed in Chinese factories and support local Chinese companies, even circumventing LEBs to do so.[290, 291, 292] Vicwood imported the vast majority of its timber as logs, much of it to be transformed in its Suzhou factories into decorative veneers, plywood, and acoustic ceilings.[293]

Auditors also witnessed SOFOKAD falsely declaring volumes of timber it had not actually logged in order to avoid appearing inactive, according to an SGS report and former auditor.[294, 295] Throughout, Vicwood continued acquiring forest concessions even when it surpassed the legally stated maximum, failed to deliver contractual and expected benefits to the domestic workforce and economy, and repatriated unprocessed resources to its factories in China, where they were transformed and sold as more valuable products.[296]

Local and forestry officials have been aware of these breaches for years. In 2015, a VICA representative told the investigative organization Global Witness that the company would soon build a sawmill to meet the processing requirement,[297] and prior to December 2017, local communities in the town of Basse Batouri—where VICA is located—submitted formal requests to local officials and to VICA asking the company to build a sawmill in order to provide jobs for young people.[298] Yet a 2023 internal SGS report shared with the MEFCP indicated there was still no sawmill at three of Vicwood's four PEAs.[299] The same report showed 2.8 billion FCFA (approximately $4.9 million) in missing taxes for the four PEAs combined between 2020 and 2023.[300] Vicwood's actions exemplify the broader trend in which foreign companies extract value from CAR's resources while the state and local populations see little to no return.

SIMILAR PATTERNS ACROSS CONGO BASIN

This transfer seems to be part of a pattern of sales of Vicwood's Congo Basin assets: According to a RoC forestry document and Luxembourg corporate registry documents, in 2022, Vicwood appears to have transferred control of its forest concession in RoC to Great Luck,[301, 302, 303, 304] and as of 2025, according to a source with high-level knowledge, Vicwood had sold its ownership of several forest companies in Cameroon as well.[305] These similar patterns of possibly illegal transfers and undisclosed debts elsewhere in the Congo Basin suggest weak oversight of the company regionwide and circumvention of laws intended to limit consolidation of forest holdings by a single entity.

Vicwood appears to have sold most of its subsidiaries in Cameroon, where its African operations were previously headquartered.[306] The group has at various times held an estimated 10 forest management units (FMUs) there through at least six subsidiary companies[307, 308] and was the largest FMU holder in Cameroon in 2022,[309] exceeding the maximum total forest area that a single company could legally possess as of 2019.[310] Article 49 of the country's 1994 forestry law also prohibits parent company structures designed to circumvent this limit, anticipating and seeking to prevent consolidation by any particular company or individual.[311]

A source with internal knowledge of company activities affirmed in 2025 that Vicwood had sold all its Cameroon subsidiaries except for Société d'Exploitation des Bois du Cameroun and Compagnie Forestiere du Cameroun, which as of 2022 held two concessions with five forest management units.[312, 313] The remaining concessions were presumably transferred when Vicwood sold its remaining title-holding subsidiaries, which as of 2022 included Compagnie Industrielle du Bois au Cameroun (CIBC), Société Africaine des Bois (SAB), and Propalm Bois[314, 315] and may also have included up to four concessions Vicwood had acquired from Dutch timber group Wijma in 2017.[316] According to a Cameroonian environmental legal expert, forestry titles cannot legally be transferred through private sale, and transfers must be granted through official legal channels.[317]

Vicwood's withdrawal from Cameroon appears to have been messy. A source with knowledge of activities in the Chinese companies involved stated that the new buyer had discovered that Stephen Chong had not disclosed all the debts he left behind.[318] An administrative worker for a Vicwood company in Cameroon told The Sentry in 2026 that many employees are owed wages and payments.[319] A security guard for a building formerly occupied by Vicwood in Cameroon corroborated this accusation, stating that the building in Douala formerly occupied by Vicwood had been vacated before June 2025 and that it had been vandalized by many of its employees, who claimed to be owed payments.[320]

In RoC, Stephen Chong and two other administrators affiliated with Vicwood withdrew from the company Axor Holding, the 100% owner of Thanry Congo, and their names were replaced with Huang Yiming and Huang Jianjun of Great Luck in July 2022 via Axor Holding company, registered in Luxembourg.[321, 322] This coincided with the appointment of a new CEO of Thanry Congo, "Elly" Ye Lin, who is the contact person listed on the Great Luck website.[323, 324, 325] Lin's LinkedIn profile lists her as both director of Thanry Congo and global sales manager of Thanry France in CAR.[326] Article 125 of RoC's Forest Code states that forest titles are "strictly personal" and cannot be transferred.[327]

Unprotected Species

The same weak or neglectful oversight and enforcement that allowed foreign forestry entities to operate with impunity in CAR has also enabled a questionably compliant and potentially harmful trade in internationally protected species. In 1980, CAR signed the treaty known as the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), which as of 2025 had 185 signatory parties.[328] More than one thousand shipments of CITES-protected timber species have been logged and exported from CAR since their listings on CITES Appendix II, as described below,[329] despite authorities not having carried out the CITES-required scientific studies. As a result, protected tree species have entered international markets without authorities first determining whether the trade would be detrimental to the survival of those species. Neither the CITES secretariat nor the CITES management authority for CAR responded to The Sentry's request for comment.

Six CITES-protected timber species are found in CAR: *Guibourtia demeusei* (bubinga),[330] *Pterocarpus soyauxii* (padouk),[331] *Afzelia pachyloba* (pachyloba),[332] *Afzelia africana* (doussié),[333] *Khaya spp.* (acajou),[334] and *Pterocarpus erinaceus* (kosso).[335] Due to their reduced populations stemming in part from unsustainable harvest and trade or by being a lookalike substitute for a threatened species, these species have been listed on Appendix II of CITES, which imposes specific requirements for their international trade. Bubinga was added to Appendix II in 2017,[336] and padouk, pachyloba, doussié, acajou, and kosso followed in 2023.[337, 338] In addition to being covered by these additional protections, the International Union for the Conservation of Nature lists kosso as endangered,[339] both the above Afzelia species and all five Khaya species as vulnerable,[340] and Guibourtia demeusei as near threatened.[341]

Before a party to CITES may issue export permits and publish export quotas for Appendix II species, a country's authorities would first need to determine, through a non-detriment finding study (NDF), what volume—if any—can be exploited without harming that species. According to an officer of the CITES secretariat, under Articles III, IV, and V of the Convention, "The issuance of export permits by Parties requires the making of NDF. In accordance with para. 10 of Resolution Conf. 14.7 (Rev. CoP15), when export quotas are established, they should be set as a result of a non-detriment finding by a Scientific Authority."[342]

Despite these requirements, CAR has published export quotas for pachyloba, padouk, khaya, and bubinga as recently as 2026.[343] An official with the CAR national authority for CITES told The Sentry in June 2025 that no NDF exists for any of the six CITES species in CAR.[344] In the almost 10 years since bubinga's listing, and approaching four years for the others, CAR has exported these protected species without having determined whether the trade harms the population, as CAR authorities have not completed the NDFs required to support those quotas.

Since these species' listings on Appendix II in 2017 and 2023, at least 1,595 shipments containing these protected species have been exported primarily to Vietnam and China, in apparent breach of CITES.[345] Of those, at least eight shipments were exported to European countries,[346] where the import—if it breached CITES—may also violate the EUTR. Responsibility for ensuring compliance with CITES rests with both the exporting and importing countries.

These apparent compliance failures extend to some of the companies named in this investigation. At least 48 of these shipments containing padouk originated from Vicwood PEAs in CAR, including 13 that were exported under the name Hong Kong Great Luck after the ownership had changed.[347]

Conclusion

Across both the Wagner-linked and Chinese concession case studies, The Sentry identified serious questions about the legality of PEA ownership, operation, or both, underpinned by a common thread: CAR authorities' weak oversight and enforcement of forestry laws and concession agreements. Yet the two cases demonstrate this common failure through different lenses, revealing that weak forestry governance in CAR is not a single problem but multiple reinforcing ones.

The Wagner-linked concessions point to selective enforcement shaped by political influence and state capture. Despite apparent breaches of CAR's Forest Code spanning concealed ownership, unpaid taxes, and prolonged inactivity, authorities have taken no action to revoke the concessions—even after US and UK[348] sanctions on Bois Rouge/WIG. This inaction is difficult to separate from the president's broader dependence on Wagner for regime stability, which appears to extend impunity from Wagner's security and mining operations into its commercial forestry holdings as well. The concessions may now matter less as timber operations than as tax-favored vehicles serving Wagner's other business interests. Yet Wagner's timber holdings, though inactive, come at a large cost to CAR through losses of revenue, jobs, community infrastructure, and wasted resources.

The Vicwood case presents a different pattern: not state capture or political protection, but chronic institutional neglect. Despite numerous apparent violations documented in audits and reports—from questionable eligibility to hold a PEA to decades of unbuilt sawmills and unprocessed exports—Vicwood's holdings expanded rather than contracted over its more than two decades in CAR. At the same time, authorities appear to not even have been aware of the transfer of Vicwood's four PEAs to a different Chinese company, which was executed—potentially illegally—with no evident oversight by CAR officials. That a company's entire portfolio—representing nearly a third of the country's commercial concessions—could change hands without official notice suggests the oversight gaps in CAR's forestry sector are structural, not incidental.

Taken together, these cases show that CAR's forestry sector suffers from both political interference and persistent governance failures, resulting in significant foreign ownership and partial surrender of sovereignty over CAR's domestic forestry assets. These issues produce the same outcome—lost revenue, foregone jobs, and depleted forest resources with no corresponding development benefit for local communities. Outside

countries risk importing timber of legally dubious origin, potentially to the detriment of species that should be receiving international protections.

The CAR government's ongoing revision of the Forest Code offers a chance to improve forest governance, balance the rights of local communities and business, and strengthen penalties for illegal logging and timber trafficking.[349] According to a draft text reviewed by The Sentry, the new Code will explicitly ban the export of unprocessed logs, create a state-run timber processing company, and allow PEAs to share access to their sawmill with other PEAs.[350] While these changes should help increase capacity and compliance with export processing requirements, legislative reform alone will not resolve the sector's underlying problems. Effective implementation will require stronger institutional oversight, transparent disclosure of beneficial ownership, consistent enforcement of concession agreements and forestry laws, and the political will to ensure that all concession holders—regardless of their political connections or commercial influence—are held to the same legal standards.

Recommendations

CAR Forest Code provisions

Ownership and control. The CAR Forest Code should be updated to require entities that bid on and hold PEAs to disclose ownership and control information and update it over the lifetime of the award. Declarations of ownership and control should be highly scrutinized to (1) ensure that there are no unidentified owners or corporate interests; (2) understand the relationships of PEA bidders and holders with foreign individuals and entities; (3) determine if the owners have sufficient experience in industrial forestry to be capable of delivering and to be viable over the term of the award; (4) identify owners of questionable moral character requiring the absence of connection to armed groups, terrorists, or groups known for violating human rights, as defined in and consistent with the CAR Mining Code;[351] and (5) ensure that the extent of land area controlled or sought does not exceed Code limits in violation of Decree 09-118, Article 29.

Material submissions and omissions. The new CAR Forestry Code should include provisions that empower the Ministry to penalize violations of the Code and, if not remedied, revoke PEA awards for (1) failure to submit required written requirements, assessments, or reports, including but not limited to environmental assessments, forestry management plans, and species inventories; (2) failure to abide by requirements to build and/or use processing facilities; (3) failure to pay taxes as required under the Code; and (4) material omissions, false or misleading statements, or fraud of any kind in the application or during the life of the award. The Code should further provide for a minimum five-year disqualification period for any individual or entity involved in material omissions, false or misleading statements, or fraud of any kind related to PEA acquisitions and awards.

Prioritize transparency in timber revenues, contracting, and spending. Under the new Forestry Code, all submissions to the Ministry and official government responses should be made public to facilitate transparency and accountability. The new Forestry Code should include a transparent bidding process for awarding timber concessions and establish a requirement that timber awards and related submissions are made public in a searchable registry that provides contracts, amendments, boundaries, expiration dates, operating status, plans and reports, concession inspections, violations, fines, and enforcement outcomes. The CAR government should establish robust and

independent anti-corruption mechanisms and implement budget and fiscal transparency measures.

Enforcement of the Forest Code. All material violations of the Forest Code should be fully investigated and prosecuted, including but not limited to logging activity inconsistent with the Forestry Code or management plans. The new Forestry Code should expressly provide that no discretion is afforded by any representative of the MEFCP or government official to waive the collection of taxes and that penalties should accrue for all late payments of taxes.

Protect CAR citizens in the forestry sector and enforce labor laws. The MEFCP should ensure that inspectors are onsite at all PEAs to oversee compliance and enforce labor laws. Violations of labor practices, including employing workers seven days a week, requiring work in dangerous weather, and not paying compensation to workers injured on the job, should be investigated. Substantiated violations should result in compensation to workers, penalties to the PEA holders, and—for significant violations—repossession of the concession award. The CAR government should enable and maintain a transparent mechanism for citizens to report violations and grievances; provide protection against retaliation for reporting; and ensure a private right of action for citizens, groups, and nongovernmental organizations, as has been done in other countries such as Liberia.[352]

The EU, UK, US, and other authorities

Consider changing the European Deforestation Regulation Country Classification for CAR. Currently the EU classifies CAR as low risk under the European Union Deforestation Regulation (EUDR), entailing the lowest level of operator checks. The significant irregularities in CAR timber concessions, presence of sanctioned actors, involvement of corrupt actors, and opaque data environment support a change in CAR's classification to standard risk.

Investigate timber shipments to the EU that may violate timber regulations. Companies in the EU that imported shipments from Great Luck should be investigated for potential violations of the EUTR, including 18 shipments—3,000 tons—to France, Spain, Portugal, Belgium, and the Netherlands from Great Luck. To the extent that the EU receives any shipments from FCC and SIF, the shipments should be investigated for violations of the EUTR.

Investigate and sanction, if appropriate, CAR entities associated with the Wagner Group in the EU, UK, and US. As was done in the UK and US, the EU should investigate and sanction Bois Rouge and its alias, WIG, for links to the already sanctioned Wagner Group given the entity still holds assets in CAR. Likewise, the EU, UK, and US

should investigate and sanction, if warranted, FCC and SIF, as well as their directors, for ties to the Wagner Group and other Russian interests.

Conduct enhanced due diligence on wood imported from CAR. The EU, the US, the UK, Vietnam, China, and other countries with timber legality requirements should conduct enhanced due diligence on timber imported from CAR, including timber routed through other countries. Such due diligence should examine the beneficial owners and actual controllers of logging concessions, compliance with CITES—including non-detriment findings—and the legality of logging activities in CAR, as described in this report.

Ensure that the CAR national authority for CITES complies with NDF requirements. The CITES Secretariat should consider this report as evidence that CITES provisions are not being effectively implemented pursuant to Article XIII of CITES and communicate the same to the national authority for CITES in CAR.[353] After considering any response from the national authority, the CITES Secretariat should recommend appropriate remedial action to ensure compliance with CITES provisions, in particular the use of properly executed NDFs based on valid scientific evidence.[354] The CAR national authority should publish its NDF in the CITES database, and moving forward, all efforts should be made by the Secretariat and others to mandate publication of all NDFs for maximum transparency and accountability.[355]

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