

DECKING THE FOREST

How Colombia's unlawful timber exports to the U.S. sustain armed groups and illegal logging

May 2025



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ACKNOWLEDGEMENT: The document has been produced with financial assistance from Norway's International Climate and Forest Initiative (NICFI), The Tilia Fund, Cox Foundation and Roaring Brooks. The contents of this publication are the sole responsibility of EIA US and do not necessarily reflect the positions of any donors.

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EXECUTIVE SUMMARY

A new investigation by the Environmental Investigation Agency (EIA) has uncovered evidence of widespread illegalities in Colombia's timber sector with links to illegal armed groups (IAGs), affecting the country's forests and connected to American, European and Canadian wood importers. Key findings include:


- An estimated 94% of Colombia's exports of decking and flooring timber products between 2020 and 2023 lacked a legally required certificate issued by authorities to validate their lawful origin, according to official information obtained by EIA. This is estimated to represent around USD 24 million worth of exports.
- Around twenty percent of these uncertified decking and flooring exports went to the United States (U.S.) – to 16 American firms - the European Union (EU) and Canada, each with laws obliging importers ensure the legal origin of their products.
- The Environmental Ombudsman of Colombia and the U.S.-Colombia Secretariat for Environmental Enforcement Matters - a mechanism that was established under the U.S.-Colombia Trade Promotion Agreement - are investigating the issuance of the certificates.
- An EIA field investigation into the IAG-controlled territory of the Atrato watershed in northwest Colombia, from where many companies source their wood exports, documented **complaints by communities of being exploited by timber firms and armed actors, in conditions some claimed were akin to modern slavery.**
- One of the owners of prominent Colombian timber exporter Los Cedros Hardwood Flooring professed to financing IAGs in the Pacific regions of Chocó and Antioquia, while exporting uncertified timber to its own companies in the U.S., exposing American consumers to illicit timber that may have links to conflict and **possibly breaching the U.S. Lacey Act that prohibits the import of illegal timber products.**
- Three case studies, involving top Colombian exporters Los Cedros Hardwood Flooring,

Maderas Santa Rita and C.I. Casa en Madera, show how they all appear to have traded uncertified timber to U.S. companies, including firms like Cedro Rojo, Amazon Hardwoods, Sabra International, Lumber Plus, Brazilian Lumber, amongst others – all possibly in breach of the Lacey Act.

- The cases also show the **impact of those firms on the forests** of Colombia's Pacific and Amazon regions, with 50% of Maderas Santa Rita's Pacific tropical hardwood 'Cumaru' purchases under investigation by Colombian law enforcement or lacking timber transport permits according to official data. Two Amazon based harvest areas managed by C.I. Casa en Madera's owner were found by EIA to have been used as likely laundering vehicles for illegally harvested timber.
- EIA's investigation also uncovered evidence that **inspection reports by a regional environmental authority**, on timber harvest areas managed by C.I. Casa en Madera's owner, were **likely falsified.**

The report calls for stronger enforcement of laws in Colombia, holding to account middlemen that finance timber harvesting in community areas controlled by IAGs, as well as improved enforcement of laws in the U.S. and the EU to prevent Colombian conflict timber from entering global markets and to shield consumers from unwittingly supporting illegal logging, conflict and human rights abuses.



A photograph showing two men in a dense tropical forest. The man in the foreground, wearing a yellow shirt and black boots, is using a machete to cut a large log. The man in the background, wearing a red shirt and grey pants, is using a chainsaw. The forest is lush with green foliage and tall trees. A blue container and a chainsaw are visible on the ground.

SECTION 1

Field investigation in the conflict-hit Pacific forests of Colombia

EIA's field investigation into the forests of the Atrato river reveals a logging industry controlled by illegal armed groups who coerce and exploit local communities to cut down valuable trees, which are then bought cheaply by wood exporters in far away cities with little regard for legality or for local economic development.

Forests, logging, communities and conflict

The Colombian departments of Chocó and Antioquia are home to some of the most biodiverse forests on Earth¹ and are top hotspots for global conservation², as well as being significant wood producers, accounting for a combined 30% of all timber transports in the country.³ The departments are home to Afro-Colombian and mestizo communities, Indigenous peoples and campesinos. Yet despite an abundance of natural resources, some of these forests are amongst the poorest areas in Colombia and suffer from high rates of illegal logging.⁴

EIA traveled along the Atrato River, between Turbo and Quibdó in the dense forests of Chocó to learn how logging occurs in these regions, interviewing community members and loggers and witnessing how IAGs benefit from timber harvesting and control the territory and the freedom of movement of the communities. The investigation found that to access these areas, outsiders need approval from armed groups and are monitored continuously by them to ensure their interests are not threatened and that the agreed-on itinerary is followed. On three separate occasions, EIA was detained by armed groups seeking to verify who they were, before allowing them continued access, highlighting the dangers of traveling for the community members. Meetings between outsiders and local communities are always attended by at least one member of an IAG. Interviewees have therefore been anonymized for safety.

The region has long suffered armed conflict, but in recent years the situation has deteriorated. A myriad of IAGs are exploiting local people’s grievances by providing opportunities in the drug trade or other illegal businesses, often coercing communities into helping them.⁵ This reportedly includes forced recruitment of children, homicides, displacement, confinement and attacks and threats against ethnic authorities and local leaders.⁶

According to the United Nations Office for the Coordination of Humanitarian Affairs, the deterioration of the humanitarian situation began in mid-2021 and the first half of 2022, which saw the expansion and progressive consolidation of two IAGs for the control of drug, timber and human trafficking routes, coca paste production and processing areas, as well as illegal mining.⁷



▼ Part of EIA’s field investigation took place in the departments of Chocó and Antioquia.



“A form of slavery” - timber harvesting impacting local communities

EIA found that in a region hit by hardship, logging is one of the few economic alternatives communities have to make a living. For some it is the only source of income. In part of these areas, Afro-Colombian or Indigenous communities own territories that are covered by forests. However, many have no resources to obtain and maintain a timber concession authorized by Regional Environmental Authorities (CARs). As a result, businessmen who live in cities like Cartagena, Medellin or Bogota negotiate with communities and offer financing to acquire timber concessions and pay for the legal fees. This includes advance payments for loggers to go into the forest and harvest the wood. In return, the businessmen and/or their middlemen become the de-facto owners of the timber, appearing as official representatives on transport permits and authorized to act on behalf of the communities. A timber exporter interviewed by EIA, who sources wood from the region, described this relationship:

▼ **Exporter:** *I send to the area forest engineers, they do inventories, they do everything, they do the studies, and we present the studies to the government and say to the government that all will be legal, legal wood, and we are going to give employment to the communities that are living in the area. And then when I have the paper ready, I go to the community, “you can start cutting, how much are you willing to charge me for [each] cubic meter?”. And they say “okay, this? [hypothetical amount]”, I say, “no, this [another amount]” and the Indians say “ok, give me some money in advance, give me food, give me beverage,” and I start to send in money and everything.*

● **EIA:** Everything is cash, you have to pay in cash?

▼ **Exporter:** *Cash or...food or drinking [sic]. Maybe sometimes they tell me, I need you to send me 1,000 beers...1,000 cokes, 1,000 kilograms of rice or meat and they balance money. I send everything and they start working and put the wood in the place I tell them to....I send my ship, and I load it...*

▼ *Cumaru logger in Puerto Conto explaining some of the challenges faced by communities.*

EIA found that another model used by businessmen is not to engage directly with communities, instead hiring middlemen in Chocó in places like Turbo, Rio Sucio, Domingodó or Quibdó that have connections with loggers. In this scenario, middlemen reach out to different loggers, often living in communities or small settlements, and provide them with financial advances to go into the forest and cut the trees. A logger from a settlement called Domingodó, along the Atrato river located in the municipality of Carmen del Darien, outlined this arrangement:

■ **Logger:** look, to take an example, you are the boss, you tell me: “I have 500 million pesos, go to Chocó and buy wood”; I come and talk here with the sawmills to buy wood, they sell it to me; I pay them to bring it, they deliver it to me here, and here I put it on a ship or you send a ship and from here I send it there and you receive the wood; that’s how it works.

EIA heard frequent complaints from community members that these arrangements are to their detriment, since they are unable to negotiate a fair price, forcing them into debt and exploitative relationships. The Community Council of the Campesino Association of the Atrato (Consejo Comunitario Mayor de la Asociación Campesina Integral del Atrato - COCOMACIA) is an organization that brings together communities that have collective rights over an area encompassing 700,000 hectares, crossing five municipalities in Chocó and three in Antioquia.⁸ Many community members work in the logging industry, going deep into the forest to harvest wood to sell timber to traders.

An interview by EIA with a community member, revealed how exploitation happens:

Community member: a 40-horsepower motor costs around 20 million pesos (USD 4,000), so the logger can’t afford to buy it... the chainsaw, which I don’t know how much it costs, but something between 8 (USD 1,600) and 12 million pesos (USD 2,400), depending on the quality; and so you can’t afford to buy... those things that you need for transportation, you can’t get enough even to

“what is most interesting to investors is to keep you in debt..... that’s already a form of slavery...”

pay for the fuel, so that... you cut the wood and they pay you with those things... and in the end, the day you get paid, you still have nothing because you come home and can’t even afford to give a candy to your child.

The logger from Domingodó outlined how these commercial relationships often begin with large debts for community members, since they have no means to buy the boats, fuel or chainsaws needed for timber harvesting: “Here, there are people who, for example, owe between 30 and 50 million pesos [approximately USD 6,000 to USD 10,000], if not more; but they [the investors] don’t care...” Another logger from the same settlement stated: “what is most interesting to investors is to keep you in debt..... that’s already a form of slavery...”



▼ Consequences of a logging accident while harvesting Cumaru in the dense forests of Chocó.



▼ The critically endangered Great Green Macaw has a strong preference for nesting in Cumaru trees. In some countries, studies show that 87% of active nests are found on this tree.



▼ Leaves of a juvenile Cumaru in Puerto Conto

Informal timber harvesting

EIA traveled with loggers deep into the forest and found that timber species sought after by exporters are now mostly available in only remote areas. One of them, *Dipteryx* spp, commonly known as Choiba or Cumaru, is protected by the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).⁹ It is commonly used to produce decking and exported abroad. Given its scarcity, loggers harvest it where it can still be found. EIA witnessed how difficult the transport of wood is, since mules are used from the extraction point to take it to small tributary waterways and float it along the river. Due to this laborious method, loggers prefer to find the timber as close as possible to settlements, rather than from areas where it has been authorized for harvest.

Unlike some other countries, Colombia has no mobile sawmills in the forest, so timber processing first happens where the tree was felled using chainsaws to turn it into smaller squared logs for ease of transport. As a result, levels of waste are high. Additionally, given the geography of the region and that IAGs prohibit entry of machinery other than chainsaws, no further processing of timber is feasible for communities that work there, affecting the prices they can charge and their prospects for economic improvement.



► First transformation happens in the forest. This species is known in the region as Choiba or Cumaru and is one of the CITES-listed species.



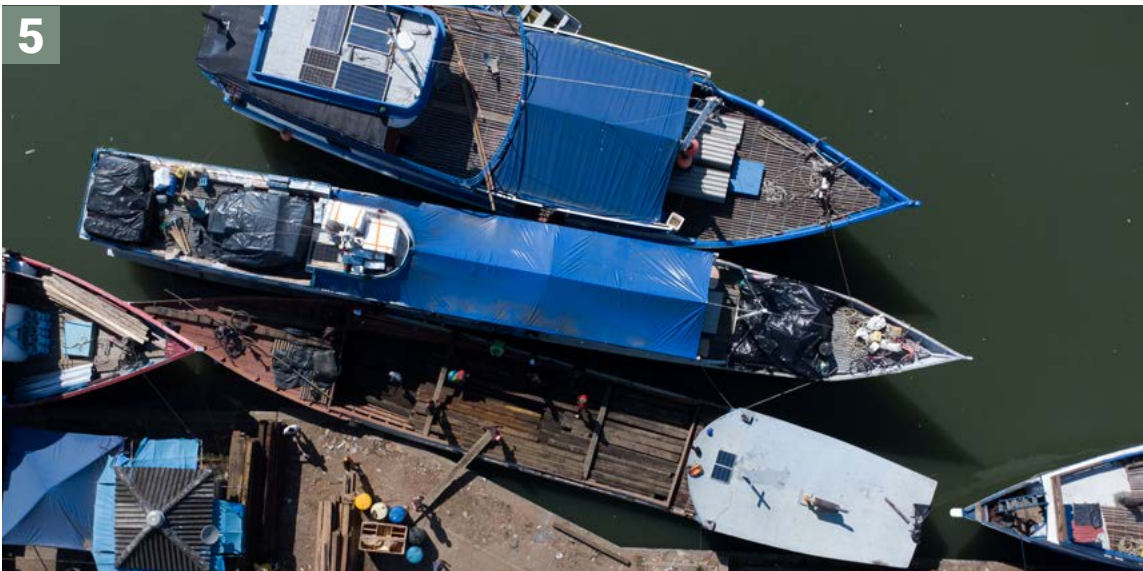
► Mules are used to transport sawn squared logs to tributaries.



► Timber is sent along waterways that reach collection points downstream.



▼ One of the aggregation points where timber awaits motorboats for transport. This is where transport permits first appear.



▼ Types of motorboats that transport the timber upstream on the Atrato river to the port of Turbo.

Obscure locations of harvest

Loggers EIA traveled with during their labor did not have timber concessions or management plans, as required by Colombian law.¹⁰ They also did not have ways to verify whether they were working inside other logging concession borders or not, as there were no demarcations or reference points to delineate those areas. Loggers told EIA that they cut trees wherever commercial species are found, rather than from approved harvest areas.

EIA also found that these loggers do not have access to, nor do they hold copies of, timber transport permits, which are legally required to follow any logs harvested at site and moved to other points.¹¹ In the case of illegally harvested timber, these key documents first appear one step further up in the supply chain, once the timber has reached an aggregation point – bringing together timber from multiple sources and loggers. At that point, a motorboat captain brings a transport permit to make it official and thus laundering the timber by making it appear on paperwork as if it came from a legal area. Aggregation points are often far from the places where the tree was harvested, making it impossible to know where the timber came from.

In a previous investigation EIA documented how middlemen facilitate timber laundering through the use of transport permits that legalize wood extracted in unauthorized areas.¹² These circumstances make it impossible for anyone outside the region to know the legal origin of any purchased or exported timber and emphasize the need for careful due diligence of the timber’s origin.

Loggers told EIA that they cut trees wherever commercial species are found, rather than from approved harvest areas.

Timber traders pay illegal armed groups

A crucial fact discovered by EIA in its field investigation and through interviews with timber exporters in the cities of Cartagena, Medellín and Barranquilla, is that everyone must abide by the demands of IAGs in Chocó and Antioquia. Exporters and traders told EIA they are regularly required to make payments to different armed groups that control the region where the timber is harvested or processed. One exporter stated to EIA that, a so-called harvesting and transportation “tax” for ships and trucks needs to be paid per trip. They mentioned that a single boat carrying 300 cubic meters (m3) of timber could be paying up to USD 2,000 in each control post established by armed groups, which can total up to USD 6,000 for a single journey depending on the different controlled areas the boat travels through. Once the timber arrives at a sawmill, often located far from the forest, owners also need to make payments to guarantee their processing operations. Payments of this type can entail providing around USD 1,000 per month to IAGs, according to the interviewed exporters.

In return, traders and exporters receive guarantees from IAGs. Once the so-called security taxes are paid, an exporter informed EIA that *“these people [armed groups] give you the security that nothing will happen and that you are not going to lose anything.”* Another exporter in Colombia mentioned to EIA that in one case a specific shipment was stolen in the forest and that armed groups helped them recover it.¹³

When EIA asked about the consequences for not complying with the demands imposed by IAGs, one exporter bluntly said: *“They don’t allow the suppliers to supply me the wood and everything stops. And if you continue fighting with it, they maybe at the end [implies they may kill you]—.”*¹⁴

The conflict and informality prevailing in the region make it practically impossible for importers of this timber in international markets to prove that it is of legal origin. In addition, almost all exports of secondary processed timber products such as decking and flooring exported from Colombia, including to the U.S. and the EU, appear to be unauthorized. As a result, U.S.

“these people [armed groups] give you the security that nothing will happen and that you are not going to lose anything.”

and EU importers may have breached laws prohibiting the import of illegal timber and can almost certainly have no idea if those products were linked to financing armed groups or to community exploitation.



▼ Carrying firearms in the region has been normalized for years.



▼ EIA documented illegal gold mining activities happening very close to a Cumaru harvesting location in La Loma, Murri / Antioquia.

An aerial photograph of a large outdoor industrial yard, likely a timber export facility. The ground is dry and dusty, with numerous tire tracks. In the foreground and middle ground, there are large stacks of cut timber logs arranged in neat piles. Several shipping containers are scattered throughout the yard; some are yellow, and others are blue with 'CMA CGM' branding. In the upper right, there are more stacks of raw logs. Two yellow semi-trucks are parked on the right side of the yard, one of which appears to be loading or unloading a trailer. The background shows some greenery and a body of water in the bottom right corner.

SECTION 2

Colombian timber exports, legal failures and the link to U.S. markets

Exports lacking legal origin

According to responses to Freedom of Information Act (FOIA) requests by EIA and analysis of official data, an estimated USD 24 million worth of Colombia’s exports of secondary processed timber products between 2020 and 2023 lacked the required certificate by authorities to validate its legal origin.¹⁵ Almost twenty percent of this went to either the U.S. the EU or Canada, all with laws prohibiting the import of illegal timber.¹⁶

U.S. companies involved

Official data shows a known total of 16 U.S. companies receiving these unlawful exports, despite the Lacey Act requiring them to exercise due care on the legal origin of these imports.



U.S. importers receiving tariff code 4409 without certifications between 2020 and 2023	Value in USD of imports	% of total
Sabra International, Inc.	USD 1,407,552.56	36.38%
El Cedro Rojo Wood Gallery, LLC	USD 983,891.00	25.43%
Brazilian Lumber, LLC	USD 453,198.70	11.71%
Amazon Hardwoods, LLC	USD 411,042.00	10.62%
OSC Logistic, Inc.	USD 155,758.64	4.03%
Global Forest Lumber Company, LLC	USD 154,475.10	3.99%
Lumber Plus Company	USD 109,642.90	2.83%
Interdecking, LLC	USD 85,263.75	2.20%
Chalas Lumber, LLC	USD 74,833.00	1.93%
Charles Kemp	USD 11,331.00	0.29%
Cedro Rojo Investments, LLC	USD 10,000.27	0.26%
R&J Builders, LLC	USD 5,427.00	0.14%
Wood & Laminates, Inc.	USD 5,171.19	0.13%
Destino Capital, LLC	USD 568.82	0.01%
Coulisse Distribution, LLC	USD 365.57	0.01%
Smar Home & Solutions	USD 117.57	0.00%
TOTAL	USD 3,868,639.07	100.00%

Official data from Colombia’s tax and customs agency (Dirección de Impuestos y Aduanas Nacionales – DIAN)¹⁷

Legal requirements

According to Article 1 of Resolution 1367 of 2000, issued by Colombia’s Ministry of Environment, secondary processed or finished forest products are defined as “products obtained through various levels of industrial processing and finishing with higher added value, such as mouldings, parquet, strip, tongue-and-groove, doors, furniture, plywood, and other similar finished products”. Decking, like the other listed items, involves significant processing and finishing to ensure it is suitable for use, typically in outdoor environments, which aligns it with other high-value wood products.¹⁸

Article 7 of the law requires that exporters of secondary processed forest products obtain a certification from the CARs or from Environmental Public Establishments (known as la Unidad Ambiental de los Grandes Centros Urbanos EPA) that shows compliance with the provisions of articles 64 to 68 of Decree 1791 of 1996.¹⁹ According to this law, exporters must show that they:


- Have a **forestry operations logbook (Libro de Operaciones)** which is regularly updated. It must include the volume and species of timber received and processed, as well proof of its legal provenance and accompanying timber transport permits, in addition to the name of the buyer and seller.
- **Submit annual reports to the authorities**, indicating the harvest area of origin of the processed products and the timber transport permits that accompany them.
- **Refrain from acquiring timber without the required permit**, which is necessary to prove its legality.
- **Allow supervision** by the competent authorities.

EIA submitted FOIA requests to all relevant authorities and found that only two companies were issued certificates between 2020 and 2023 for decking and flooring products (HS CODE 4409), specifically linked to U.S. markets—suggesting that an estimated **94% of Colombia’s global exports during that period were in violation of national law**.²⁰ Without this information, neither Colombian authorities nor American importers can know for certain the legal origin of any of that timber, exposing consumers to the possibility they may be buying unauthorized goods. (See the Annex for our methodology, company responses, and legal changes for exports effective May 16, 2025)

Colombia’s Procurador Delegado para Asuntos Ambientales—an official ombudsman responsible for holding state institutions accountable for implementing environmental law—has opened investigations, as authorities have failed to issue the required certificates in the vast majority of cases. The lack of issuance of the certificates is also currently being investigated by the U.S.-Colombia Secretariat for Environmental Enforcement Matters, a mechanism that was established under the U.S.-Colombia Trade Promotion Agreement.

The failure to issue the legally required certificates is especially problematic when considering timber originating from conflict-hit regions of Colombia, such as Chocó and Antioquia. The following case studies illustrate how problematic this lack of certification is, which companies are involved, the problems embedded in their supply chains and the implications this has for the Colombian government’s management of its Pacific and Amazon forests, as well as for the communities that live there.



A photograph of a person from behind, carrying a large, dark, weathered wooden beam on their shoulder. The person is wearing a dark blue sleeveless shirt. They are standing in a large pile of similar wooden beams and planks, some of which are painted red. The scene is brightly lit, suggesting an outdoor construction or lumber yard setting.

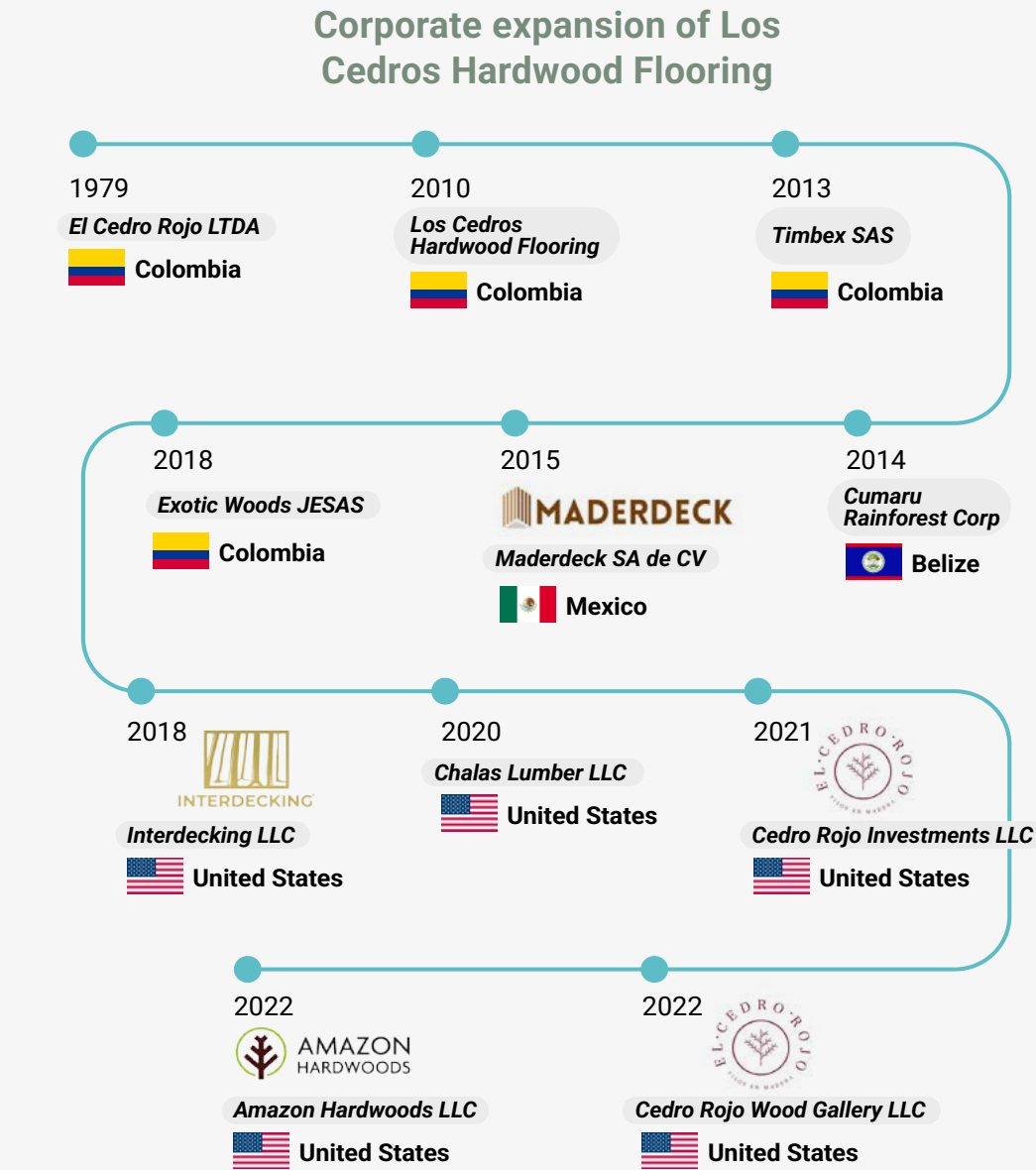
SECTION 3 Case studies

Case 1: Los Cedros Hardwood Flooring and its unauthorized and conflict-linked timber exports

EIA investigations and analysis of official information reveals that almost **93%** of a prominent family-owned Colombian timber companies’ exports to the U.S., Canada and the EU between 2020 and 2023 **lacked the required official certificate validating their legal origin** in Colombia and thus breached U.S., Canadian and EU laws that prohibit those markets from importing illegal timber. In addition, EIA obtained admissions from one of the owners that the firm has longstanding relationships with IAGs in Colombia’s Pacific region, corruptly paying them to enable its forestry business to operate. As a result, unwitting international consumers may have bought unauthorized timber that also contributed to financing conflict.

A family-owned business

Los Cedros Hardwood Flooring and Exotic Woods J.E. are family-owned Colombian firms²¹ that claim to have been in the global timber business for 20 years,²² exporting between 2020 and 2024 over USD 41 million worth of wood products to clients in the U.S., Mexico, Vietnam and the EU, among other destinations.²³ Their exports include shipments of decking made of the tropical hardwood “Cumaru” to U.S. based companies, some of which are also owned by the family.²⁴ Los Cedros has a showroom in Medellin, a processing facility in Copacabana, another transformation plant in Uraba and depots in Cartagena. One of its owners claims to source much of the firm’s timber from harvest areas in the conflict-hit Pacific forests of Chocó and Antioquia, some of which is financed via local communities that own land there.²⁵



▼ Source: EIA. Based on publicly available information.

Armed groups, bribes and conflict timber that fuel the narco economy

EIA investigators met in Colombia with a registered family owner and legal representative of a number of Los Cedros' network of companies.²⁶ He told EIA he has extensive relationships with local armed groups in the Colombian department of Chocó and the region of Urabá and Antioquia, where official information shows Los Cedros sources most of its timber²⁷ and where it told EIA it has harvest areas.

He named narco-trafficking and paramilitary groups operating in those areas and told EIA he pays armed groups to permit the secure harvest and transport of his timber and that he has a long-established reputation with them, earning him the nickname the “Mono de Cartagena” (Monkey of Cartagena). He said that local governments are complicit with this corruption by working with armed groups to enable their illegal activities.

He explained that every region has its own “*comandante [commander]*”, but since they have a longstanding relationship with his family, they allow his boats and trucks through and secure the operations of his processing plant and depots. He commented to EIA that for many years, he has experience in “managing these difficult people”,²⁸ mentioning, among others, the armed groups controlling the area where his timber is harvested/transported as being: “*Los Urabeños, Paramilitaries, Aguilas Negras [Black Eagles], cartels.*” In May 2013, then–U.S. President Obama identified Los Urabeños as a Significant Foreign Narcotics Trafficker (SDNT) under the rules of the Kingpin Act. The U.S. Treasury Department labeled them as the “largest and most influential criminal group operating in Colombia”.²⁹ The Aguilas Negras were reportedly formed between 2004 and 2006 during Colombia’s demobilization of paramilitary death squads.³⁰ It is commonly used as a blanket name³¹ by a variety of criminal interests involved in drug trafficking, extortion, land theft, kidnapping and contract killing.³²



The Los Cedros owner also told EIA he needed to “*be their friend*” to operate and claims he regularly pays different groups a so-called “*security tax*” in order to maintain his operations in the areas they control. Maintaining one sawmill in the region, he elaborated, could entail providing around USD 1,000 per month to IAGs. He stated that a so-called “*harvesting*” and “*transportation tax*” for ships and trucks as well as a tax at a port in the municipality of Turbo, in the department of Antioquia, where his timber is loaded onto a ship, is paid to armed groups.³³ Other sources interviewed by EIA investigators reported that a boat carrying 300m3 of timber could be paying up to USD 2,000 in each control post established by armed groups, which can total up to USD 6,000 for a single journey depending on the area.³⁴ Once the so-called “*taxes*” are paid, explained Los Cedros’ owner, “*these people [armed groups] give you the security that nothing will happen*” and that you are “*not going to lose anything*”.³⁵

He added that “*my family works with all the documents for the legal government, and we need to comply with the laws of the illegal people.*” He claimed this was part of the “*narcotraffic economy*”,³⁶ explaining that “*new people, new faces, it’s a problem here... they don’t want you to be looking at what is happening, no. You need to be a familiar face. If not, not.*” The owner also said “*the law is very simple. I have to know you. Okay. They say: “okay, you have been working here in this area thirty years, you paid, you helped me”, adding that he travels to the region twice or three times a year to deal with these “security” issues.*³⁷ He explained that armed groups and local governments “*are friends*” and that he must “*pay the government there, to do the documents and everything because the government don’t take care of me. No. They [the armed groups] do*”.³⁸ The government departments that monitor timber harvesting in the regions where he operates are the Corporacion Nacional para el Desarrollo del Chocó (CODECHOCÓ)³⁹ and the Corporación para el Desarrollo Sostenible de Urabá (CORPOURABA).⁴⁰

In summary, one of the main shareholders and controlling owners of Los Cedros’ timber businesses in Colombia professed to having close and longstanding financial relationships with IAGs in the Pacific region. If his claims are true, U.S. importers and unwitting consumers may be buying decking and flooring that finance illegal, violent armed groups who, as we have seen, control vast swathes of Colombia’s Pacific forests.



This raises serious question about the due diligence U.S. importers are doing to find out whether the Colombian timber they buy from Los Cedros and its affiliates are not linked to conflict and are legal.

U.S., EU and Canadian imports of conflict linked timber lacking proof of legal origin

FOIA requests and analysis of official data by EIA reveal that between 2020 and 2023, **93% of Los Cedros and Exotic Woods J.E.’s global exports** of secondary processed timber products, of decking and flooring (HS CODE 4409), **lacked valid certificates required by Colombian law** and that verify their legal origin,⁴¹ amounting to **around USD 16 million**. Of this, approximately USD 2.2 million went to seven U.S.-based companies, five of which have been or are linked to the family business, one is a Canadian firm and one is a Portuguese business in the EU.⁴² All of those countries have laws that prohibit the import of illegal timber.⁴³



► Los Cedros Hardwood Flooring depot in Cartagena, Colombia.

Importing country	Importer of Los Cedros Hardwood Flooring and Exotic Woods J.E. exports of decking/flooring (HSCODE 4409) without the required certificate 2020-2023	Value in USD
CANADA	Exocan Group Inc	\$428,685.00
UNITED STATES	El Cedro Rojo Wood Gallery LLC (part of Los Cedros' network) ⁴⁴	\$983,891.00
	Amazon Hardwoods LLC (linked to Los Cedros' network)	\$411,042.00
	Global Forest Lumber Company LLC	\$110,331.00
	Interdecking, LLC (was part of Los Cedros' network) ⁴⁵	\$85,263.75
	Chalas Lumber LLC (part of Los Cedros' network) ⁴⁶	\$74,833.00
	OSC Logistic Inc	\$74,646.00
	Cedro Rojo Investments LLC (part of Los Cedros' network) ⁴⁷	\$10,000.27
PORTUGAL	SOMAPIL, Sociedade de Madeiras de Pinho, Lda	\$43,265
Grand Total		\$2,221,957.02

Official data from Colombia's tax and customs agency (DIAN)⁴⁸

As noted, the certificate for secondary processed products that Los Cedros Hardwood Flooring and Exotic Woods J.E. lacked is required by law and should be issued by Colombian CARs or port authorities to ensure the firm has valid transport permits and official documents that verify the legality of the harvest area of origin. Without issuing the certificate no authority can be sure of the legal provenance of Los Cedros' and

Exotic Woods J.E.'s timber nor can any importing company. This becomes especially problematic when that timber may have originated from conflict-hit regions in Chocó and Antioquia.



Case 2: Maderas Santa Rita and its U.S. clients

Another EIA investigation into a major Colombian wood export company—Maderas Santa Rita—reveals that half of the firm’s inspected Cumaru timber sawmill entries are either under official investigation by Colombian authorities for possible illegalities, or lack transport permits, according to official data. These include entries sourced from harvest areas affected by clear-cutting and from local community forests riddled with social conflict linked to IAGs. EIA also found that **all its U.S. exports** of secondary processed products **between 2020 and May 2023**, like Cumaru decking or flooring, **have not been issued the required certificates validating their legal origin**, with question marks remaining about whether it was issued a certificate for its remaining 2023 exports. This exposes its American clients and their consumers to imports potentially linked to social conflict and illegality, to the detriment of Colombia’s biodiverse Pacific forests.

Decking specialist

Maderas Santa Rita is one of the largest exporters in Colombia of sawn timber and decking. Between 2020 and 2023 official data shows it registered sales of around USD 3.7 million to clients the EU, the U.S., Mexico, and the Dominican Republic.⁴⁹ It focuses mainly on producing goods such as decking, flooring, and flitches, using hardwoods like Cumaru.⁵⁰ EIA’s investigators met with its General Manager who claimed most of their exports are of Cumaru and come from the Departments of Antioquia – the third most deforested region in the country⁵¹ - and Chocó, the same conflict dominated areas Los Cedros Hardwood Flooring sources its timber from. The manager also said Maderas Santa Rita owns a processing unit in the port city of Barranquilla in Colombia’s department of Atlántico, which receives, processes and exports its timber.⁵²

Sawmill under scrutiny

Official data EIA obtained through FOIA requests shows 968.66 m3 of Cumaru entering Maderas Santa Rita’s sawmill in Barranquilla between 2019 and 2022 from the conflict-hit departments of Chocó and Antioquia.⁵³ EIA interviews with public officials who compile the firm’s sawmill data and our own analysis of official information, show that 501.51 m3 of its Cumaru is either being investigated by authorities for suspected illegalities or does not appear on official transport permit data.⁵⁴ In total, throughout the period analysed, the data shows that **over 50% of Maderas Santa Rita’s registered Cumaru entries from Chocó and Antioquia combined may have been unlawful.**

Drilling down into official information⁵⁵ specific to the department of Chocó reveals that between 2019 and 2022 Maderas Santa Rita received 127.97 m3 of Cumaru from five harvest areas there, 45.99 m3 of which is either being investigated by authorities for suspected illegalities or fails to appear on official transport permit data EIA accessed, accounting for 36% of the total. Satellite analysis by EIA of one of the harvest areas the firm sourced from in 2019, showed there was clear cutting of forests where official coordinates claim Cumaru was authorized for harvest. Colombian law prohibits clear cutting in logging areas.⁵⁶ (see box below)



Community, conflict, clear-cutting and Cumaru

Official information accessed by EIA shows that one of the timber harvest areas Maderas Santa Rita purchased Cumaru from in 2019 is an Afro-Colombian community known as the *Consejo Comunitario del Río Curvaradó* – located in the northwest region of the department of Chocó in Colombia.⁵⁷ The communities have experienced significant forced displacement and deforestation, primarily driven by violent conflicts and illegal land acquisitions to produce commodities like palm oil.⁵⁸

During the latter half of the 20th century, Colombia was engulfed in a civil war involving the government, the Revolutionary Armed Forces of Colombia (FARC), and various paramilitary groups. This conflict heavily impacted Afro-descendant and Indigenous communities, particularly in the Chocó region. The violence led to widespread displacement, with communities being forcibly removed from their ancestral lands, including those from the *Curvaradó* river.⁵⁹

In the 2000s, the situation worsened as palm oil companies, reportedly collaborating with paramilitary groups, illegally acquired land in the Curvaradó and Jiguamiandó river basins. Investigations revealed these companies used coercion, threats, and forged documents to dispossess the communities, partly driven by the economic potential of palm oil plantations.⁶⁰ The environmental impacts have been severe. Large-scale palm oil cultivation has led to significant deforestation, reducing biodiversity, depleting water resources, and causing soil erosion.⁶¹

Internationally, the plight of these communities has also gained attention. The Inter-American Court of Human Rights ordered the Colombian government to take measures to protect the rights and lives of the displaced communities and facilitate a return to their lands.⁶² Despite these legal interventions, challenges remain in enforcing these protections.

An EIA analysis of the origin of Maderas Santa Rita's Cumaru timber in harvest areas assigned in the *Consejo Comunitario del Río Curvaradó* territory shows it has suffered significant deforestation since 2016, in the locations official information claims is a timber harvest area reserved for sustainable logging:

Clear-cutting instead of selective logging

▼ Timber harvest area of the Consejo Comunitario del Río Curvaradó in 2016, showing where the tropical hardwood species "Cumaru" is supposed to be located:



▼ Timber harvest area of the Consejo Comunitario del Río Curvaradó in 2018, now heavily deforested in and around zones where official data accessed by EIA shows Cumaru was authorized for selective harvest—and from which Maderas Santa Rita received timber in 2019.

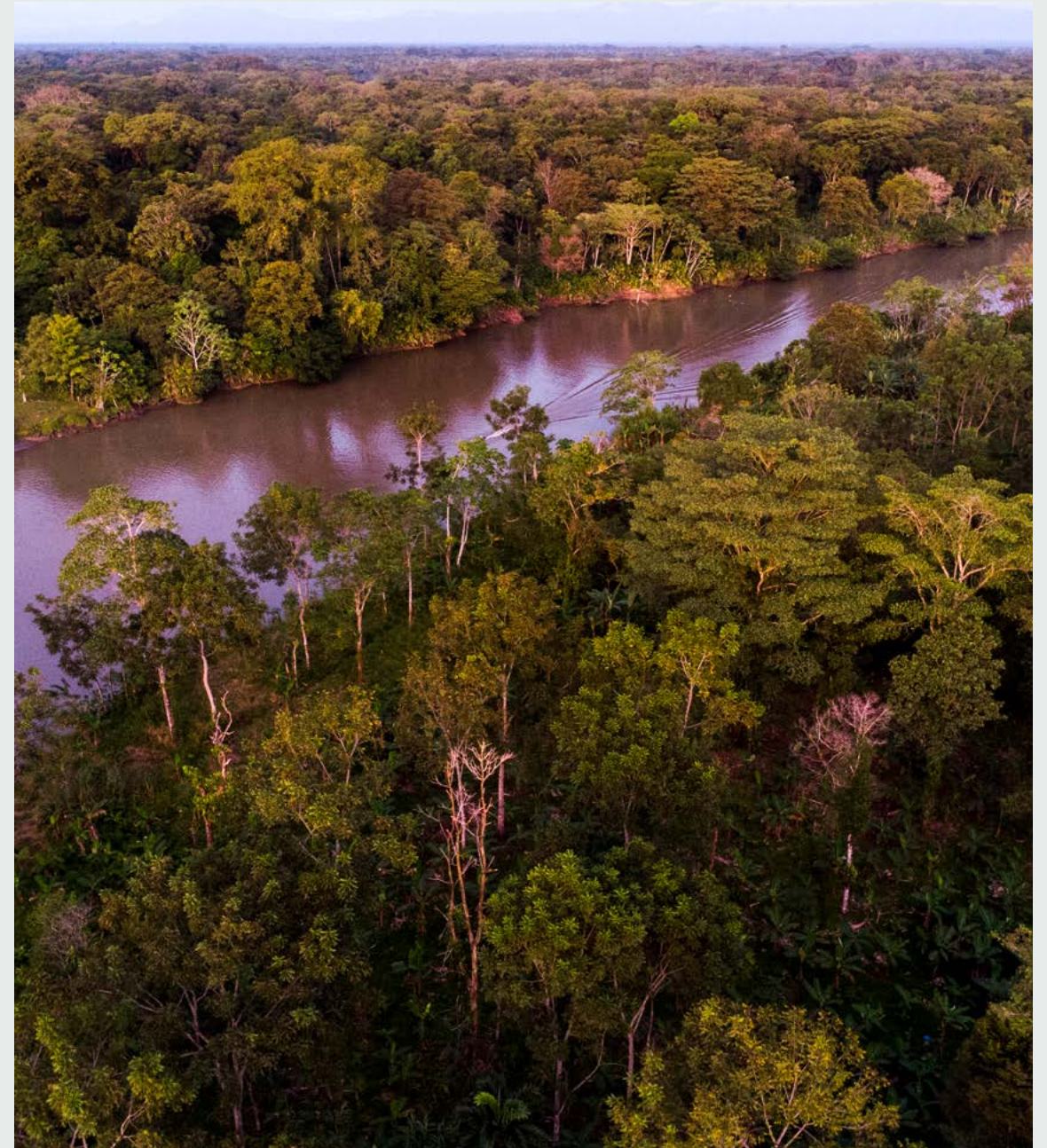


Under Colombian law the harvest area is legally required to keep the forest standing so it can regenerate and be used again for logging.⁶³ This means any deforestation in the area would be illegal. The community timber harvest area has as its legal representative a community member⁶⁴ accused of not representing its interests, allegedly conniving instead with the companies that illegally acquired land there as well as with armed groups.⁶⁵ The representative's management of the timber harvesting area led to a brief suspension of activities in 2021, though operations were later resumed.⁶⁶

Given that transport permits claim Maderas Santa Rita sourced its Cumaru from a harvest area in this community territory in 2019, which is rife with deforestation, internal division and conflict, and given half the firm's Cumaru timber sawmill entries are under question, doubts remain about what the firm is doing to ensure its timber purchases are not linked to human rights abuses and illegalities.



▼ AGC is one of the Illegal Armed Groups operating in the region. AGC marks locations to remind communities of their presence in the region.



Problematic exports

An analysis by EIA also reveals that **all Maderas Santa Rita’s exports of Cumaru decking and other processed wood products between 2020 and May 2023 lacked the legally required certificate validating its legal origin**, amounting to over **USD 3.5 million**, according to official information.⁶⁶ As noted, every Colombian port city and region has an authority tasked with certifying the legal origin of timber products for export. Official information accessed by EIA from the EPA of Barranquilla and from the CAR of the department of Atlántico, where Maderas Santa Rita has its facility, revealed they never issued any certificates for the firms’ secondary processed wood exports between 2020 and May 2023, with question marks concerning whether one was issued for the firm’s remaining 2023 exports. All of this at the expense of Colombia’s management of its west coast forests.



Importing country	Companies importing uncertified 4409 from Maderas Santa Rita (2020-2023)	Value in USD
U.S.	Brazilian Lumber LLC	\$453,198.7
	Lumber Plus Company	\$109,642.90
	Global Forest Lumber Company LLC	\$44,144.10
Italy	Bertolino Piero SRL	\$81,415.90
Mexico	Bozovich S. de R.L de CV	\$2,260,505.71
	Maderera Bozovich SAC	\$447,307.12
	Maderdeck, SA de CV	\$76,390.22
	Grupo Tenerife, SA de CV	\$43,635.28
	Summum Exotic Hardwood And Dryers SA de CV	\$35,476.00
Dominican Republic	Corporacion Mobel SA	\$6,750.00
Grand Total		\$3,558,465.93

Official data from Colombia’s tax and customs agency (DIAN)⁶⁷

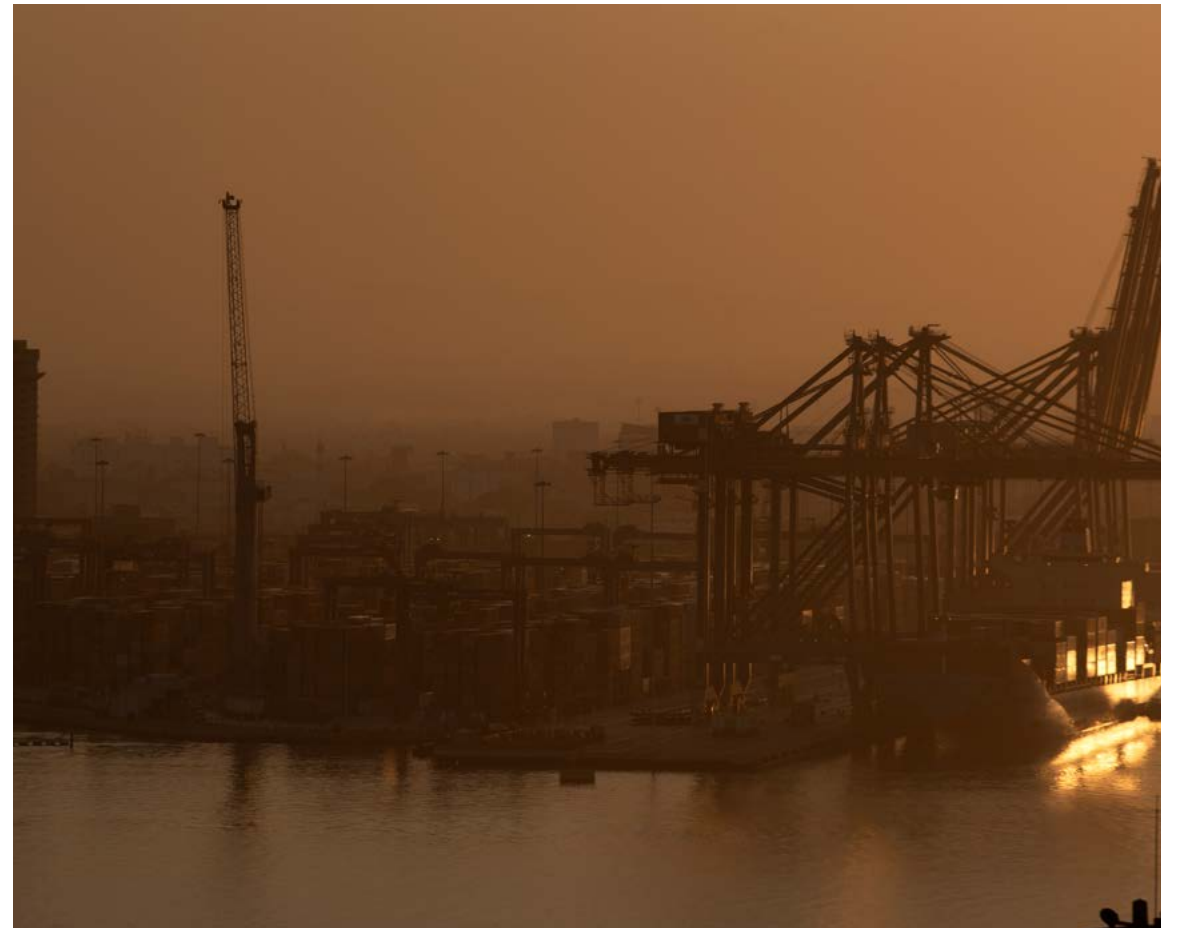
The failures of U.S. importers

Over the last three years various U.S. importers have received timber from Maderas Santa Rita the legal origin of which appears not to have been certified by Colombian authorities, as required by law. These imports may have breached the U.S.’s Lacey Act,⁶⁸ which prohibits the import of illegal timber and requires firms to carry out due care on the legal origin of their wood products.

Official records⁶⁹ show one of Maderas Santa Rita’s U.S.-based clients is **Brazilian Lumber**⁷⁰ – a big decking specialist with offices in Miami and California that sourced timber from the Colombian firm throughout 2022 (around the time some of its Cumaru purchases were under investigation by authorities) and into 2023.⁷¹ In addition to lacking the legally required certificate validating the legal origin of those exports, Maderas Santa Rita’s General Manager told EIA investigators that he does not pass on timber transport permits to his U.S. clients.⁷² EIA investigators, also met with a senior manager at Brazilian Lumber⁷³ and were told the American company makes efforts to ensure all its timber is legal. Given the problems linked to Maderas Santa Rita’s sawmill and uncertified exports, as well as its links to conflict impacted community territories and given it does not pass on timber transport permits, questions remain about what efforts Brazilian Lumber really is making to remove those kinds of problems from its imports.

Data from 2023⁷⁴ accessed by EIA also shows Maderas Santa Rita exporting timber to the U.S.-based company **Lumber Plus**, which specializes in tropical hardwood products like Cumaru decking and has offices throughout the U.S. in Miami, Houston, Tampa and Boston.⁷⁵ As a result of its Colombian imports, the firm may have breached the U.S. Lacey Act’s requirement to exercise “due care”⁷⁶ on the legality of its timber products given these appear to lack certificates, which is especially problematic when they may have come from a region controlled by IAGs as well as from a company under investigation.

All of these U.S. importers are exposed to Maderas Santa Rita’s uncertified timber exports and to its tainted supply chains, which are linked to a clear cut harvest area rife with conflict and community strife. None of the American firms can guarantee the legal origin of their Cumaru imports, potentially breaching U.S. laws, all at the expense of Colombia’s governance of its forests.



Case 3: C.I. Casa en Madera and its Amazon operations

Located in the Amazon department of Caquetá, the timber company **C.I. Casa en Madera**⁷⁷ is owned by an individual⁷⁸ who is the beneficiary of six timber harvest areas there and one in the Amazon department of Putumayo.⁷⁹ The firm is one of the biggest exporters of timber products like decking and flooring (HS CODE 4409) to the U.S.⁸⁰ As with the previous cases, it also does not appear on any official information provided to EIA showing which firms have valid certificates verifying the legal origin of their exports. Additional satellite analysis by EIA and consultations with experts on the matter show that two harvest areas assigned to the firm’s owner, one in the Amazon department of Putumayo and the other in Caquetá, appear to have little evidence of logging, suggesting they may have been used as laundering vehicles for timber extracted elsewhere. Worse, there are indications that inspection reports of the areas may have been falsified by CORPOAMAZONIA, the regional environmental authority with jurisdiction in Caquetá and Putumayo.

Unauthorized imports with questionable provenance

Between 2020 and 2023 C.I. Casa en Madera registered almost USD 1.4 million of exported products to Florida-based timber importer **Sabra International**⁸¹ - all of it lacking an official certificate verifying its legality.⁸² The American firm was previously involved in a scandal where its timber imports from Peru were found to be illegal by Peruvian authorities and impounded in Mexico while en-route to the U.S.⁸³ EIA investigators met with the firms’ Director and an assistant, to find out what efforts it makes to know the legal origin of its Colombian timber imports. They claimed that all the timber they buy from Colombia can be shown to be legal – even though EIA has found all C.I. Casa en Madera’s exports lack a certificate confirming its legal provenance. The assistant added, however, that they had a 14-year relationship with C.I. Casa en Madera and when pressed on the origin of their timber imports from

Colombia said they did not know of its provenance beyond the sawmill. The assistant also mentioned that a cost for operating a sawmill in Colombia is higher than one might think – stating that money is needed to pay the police, officials and guerillas.⁸⁴ For a U.S. importer to admit knowledge of the need to pay off IAGs in Colombia, while purchasing uncertified timber from its long-term partner, should alert U.S. authorities about possible breaches of the Lacey Act.

From the U.S. to the Amazon

Staff from Sabra were also able to put EIA investigators into contact with the owner of C.I. Casa en Madera – whom they met in Caquetá’s city of Florencia. He told EIA investigators how he buys from timber harvest areas in Indigenous territories in the region, providing them with schools, soccer fields and other social investments.

When asked about armed groups and whether he had to deal with them, C.I. Casa en Madera’s owner mentioned FARC dissidents operating there but that he did not deal with them directly, claiming instead it was the timber extractors that must pay them off and that he merely receives the products. However, EIA has found that the sawmill owner is the operator of no less than seven timber harvest areas, six located in Caquetá and one in the department of Putumayo⁸⁵ and therefore plays a crucial role in timber harvesting in Amazon forests where armed groups operate.

... the cost for operating a sawmill in Colombia is higher than one might think – money is needed to pay the police, officials and guerillas ...

Assistant of Sabra International



► Casa en Madera's sawmill in Florencia, Caquetá.

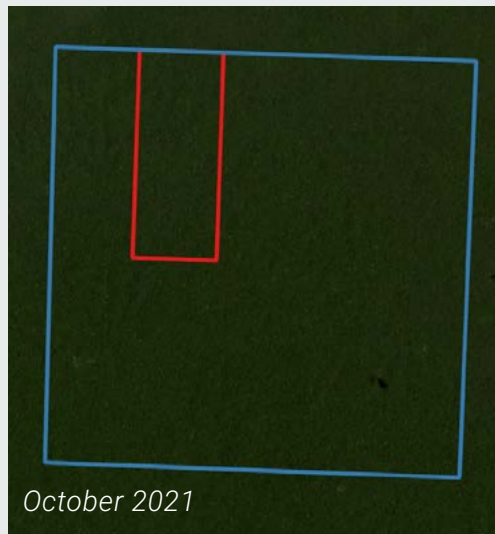


Timber laundering in Putumayo?

EIA satellite analysis of two of the harvest areas held by the owner of C.I. Casa en Madera show no obvious signs of logging, despite inspection reports of the areas by authorities claiming they had been logged legally, suggesting these were falsified. Satellite imagery experts consulted by EIA arrived at a similar conclusion.

The first of the owner's timber harvest areas analysed by EIA and the consulted expert is located in the Amazon region of Putumayo. The 5,000 hectare harvest area, roughly the size of an equivalent number of football fields, is broken down into parcels with an annual rotation of logging – called “Unidades de Corte Annual” (UCA). According to official inspection reports of the second annual rotational logging site – UCA 2- by CORPOAMAZONIA, logs amounting to over 10,000m³ were reportedly harvested in an area spanning 500 hectares, then claimed to be chain sawed on site to a reduced volume of 4,407m³ and transported from there between September 2021 and March 2022.⁸⁶

Where are the missing trees?



▼ Satellite images of the owner of C.I. Casa en Madera's timber harvest area in Putumayo in blue and the second harvest (UCA 2) within it in red, as of October 2021 and April 2022, where official documents claim logging activities happened (Planet monthly mosaic images).

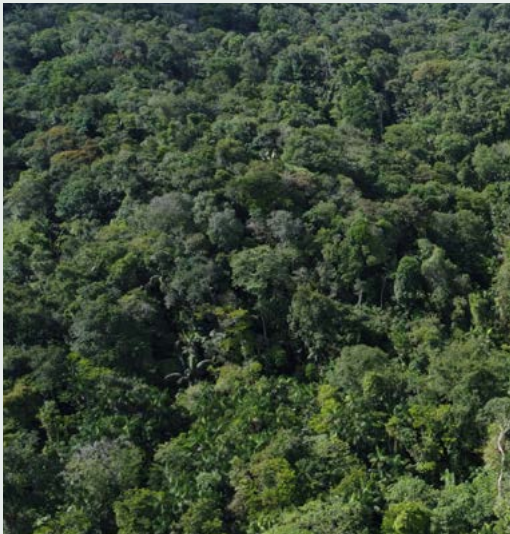
Satellite imagery analyzed by EIA showed practically no change in the forest cover during the period when selective logging was reportedly taking place. This lack of activity suggests that logging might not have occurred there, with timber possibly being harvested elsewhere and laundered using paperwork from the harvest area, supported by a falsified inspection report from CORPOAMAZONIA. To verify, EIA consulted an expert who used the Normalized Difference Vegetation Index (NDVI) and the Normalized Difference Fraction Index (NDFI) to analyze satellite imagery of the harvest area. NDVI measures how green and healthy the vegetation is, detecting significant tree removal if logging had occurred, while NDFI distinguishes between live plants, dead plants, and bare soil, identifying changes in land cover due to logging. The expert's analysis found no evidence of logging, supporting the idea that the area was used for laundering and that the inspection was falsified.⁸⁷

EIA also consulted an ex-supervisor for Peru's logging inspection agency, OSINFOR, with years of experience of carrying out these audits, who read CORPOAMAZONIA's reports and concluded it was highly unlikely they would have been able to inspect the amount of locations claimed to be inspected in the 10 days they alleged it took. As a result, the expert said it was likely the report was falsified.



Caquetá timber laundering?

Another of the owner of C.I. Casa en Madera’s timber harvest area analysed by EIA is located within the Amazon department of Caquetá, in the municipality of Solano and is called “Predio El Tesoro”. The owner was authorized to harvest 1,571.84 m3 of timber within a smaller 40-hectare area in it called UCA 2.⁸⁸ Inspection reports by CORPOAMAZONIA of this parcel claimed logging happened within the law. Yet once again, satellite images analysed by EIA indicate little evidence of logging between November 2021 and July 2022, the period when harvesting was alleged to have occurred.⁸⁹ The NDFI and the NDVI assessments also found no evidence of logging, confirming EIA’s analysis and suggesting this harvest area was also used as a laundering vehicle for illegal timber with yet another likely falsified supervision report by CORPOAMAZONIA. The ex-OSINFOR Peruvian expert, after reading the supervision report, came to a similar conclusion.⁹⁰



▼ Primary tropical forest in Colombia

Where are the missing trees?



▼ Harvest area “Predio El Tesoro” highlighted in red, with a smaller annual rotational logging area in it called UCA 2 in blue, where logging was alleged to have occurred between November 2021 and June 2022. Source: Planet imagery.

The questionable harvest operations and supply chains in Caquetá and Putumayo linked to C.I. Casa en Madera’s owner, and with the firm’s exports lacking the legally required certificates, serious doubts remain about the legality of the company’s timber and indicates the U.S. importer Sabra International did not carry out the due care required by the Lacey Act. The American company, with a controversial history and having a long-term relationship with its Colombian partner, even professed to being aware of the need to pay off guerilla groups in Colombia to enable timber harvesting and shows no sign of ensuring its timber was not illegal or conflict linked. CORPOAMAZONIA, that assigned timber harvest areas to the owner of C.I. Casa en Madera may also be falsifying supervision reports, hinting at corruption as well as a possible conflict of interest in its role of assigning and also inspecting harvest areas, suggesting a separation of these powers may be needed.



► Casa en Madera's sawmill in Florencia, Caqueta.



CONCLUSION

EIA's investigation, reveals significant legal problems in Colombia's timber export industry. According to our investigation, between 2020 and 2023 an estimated 94% of Colombia's global timber exports of decking and flooring, worth almost USD 24 million, appear to lack certification, in breach of Colombian law. Our investigation further shows that timber harvesting in the country is linked to the financing of IAGs and a high likelihood of laundering in certain areas, raising concerns about importers' compliance with laws in the U.S., EU and Canada that prohibit the entry of illegal timber. One timber exporter, Los Cedros Hardwood Flooring, openly admitted to financing armed groups, perpetuating violence and exploitation in the Pacific region, while Maderas Santa Rita and C.I. Casa en Madera have suspect supply chains variously linked to official investigations, deforestation, community conflict and possible timber laundering in Colombia's Pacific and Amazon forests. Meanwhile, the fact that CORPOAMAZONIA—and CARs more broadly—are responsible both for assigning forest areas for logging and for inspecting them may constitute a conflict of interest. This arrangement could also create incentives to falsify inspection reports. For this reason, it is important to address the need for independent forest monitoring in Colombia, to complement the oversight currently exercised by the CARs.

The apparent failure of the U.S. importers—both those owned by Los Cedros and others such as Sabra International, Brazilian Lumber, and Lumber Plus— to verify the legality of their imports emphasizes the need for stricter enforcement of the due care element of the Lacey Act, to prevent the trade of unauthorized timber that may also be linked to conflict. Interviewed community members living under the coercion of IAGs in Choco, see little benefit from logging and are being exploited by timber exporters or middlemen with little transparency about these commercial relationships, making proper due care even more urgent for U.S. importers. Without greater enforcement, due diligence and transparency across timber supply chains in Colombia, and without pressure from importers in the U.S. and the EU, conflict-linked and illegal timber will continue being sold to unwitting consumers, undermining the rule of law, its forests and the livelihoods of those that live in them.





Recommendations

A close-up photograph of a large stack of cut logs. The logs are arranged in a way that shows their circular cross-sections. Many of the logs have handwritten markings in red and yellow ink, likely for identification or tracking purposes. The wood is a light brown color, and the bark is dark and rough. The background is slightly blurred, showing more logs and some structural elements of a building.

The Colombian Government should:

- Fully implement Colombian laws and implement in full the recommendations made by Colombia's Environmental Ombudsman's Office on the matters raised in this report.
- Investigate Los Cedros Hardwood Flooring and its affiliates for its alleged funding of IAGs in Choco and Antioquia and C.I. Casa en Madera and Maderas Santa Rita for possible laundering of timber.
- Introduce a national transparent, digital traceability system that monitors the harvest, transport, processing and export of timber, enabling increased scrutiny of legal compliance across the supply chain.
- Digitize and make public all timber harvest area approvals and the paperwork needed to legalize those operations, as well as supervision reports.
- Improve remote satellite monitoring of harvest areas to identify those being used as laundering vehicles and to prioritize supervision.
- Pass laws that protect communities from being exploited by outsiders and end the impunity of middlemen by ensuring they are liable for any illegalities committed in community harvest areas.
- Make transparent the logging contracts between middlemen and communities and provide support to communities to protect them from coercive relationships with IAGs or timber traders.
- Address the conflict of interest in Regional Authorities' allocation and simultaneous

supervision of timber harvest areas and management plans, by creating an independent oversight body to supervise the logging sector, such as exist in Brazil and Peru.

- Work with Regional Environmental Authorities (CARs) to better implement and enforce logging laws and to reduce the influence of armed groups.

U.S. and EU law enforcement should:

- Ensure all U.S. and EU importers are exercising due care or due diligence on their Colombian timber imports respectively, and that all imported products have valid certificates and are legal and conflict free.
- Investigate importers who have failed to exercise due care and have imported illegal or conflict timber.

U.S. and EU governments should:

- Support the Colombian government efforts to introduce a transparent traceability system across timber supply chains.
- Help improve remote satellite monitoring of logging.
- Support Colombian law enforcement and respective forest reform efforts through bilateral cooperation.

An aerial photograph of a large industrial lumber yard. In the center, a yellow semi-truck is parked next to a long blue shipping container. To the left, there are several more blue shipping containers, one of which has 'CMA CGM' written on it. Large stacks of cut logs are visible on the left side, and stacks of processed lumber are on the right. The ground is sandy and shows tire tracks. A semi-transparent brown box with white text is in the upper right corner.

Annexes and Company Responses



METHODOLOGY

NDFI

To assess whether logging occurred in the harvest areas belonging to C.I. Casa en Madera's owner, EIA used the Normalized Difference Fraction Index (NDFI) method to detect whether logging occurred in each of the harvest areas. NDFI is a satellite monitoring tool that enables detection and mapping of forest degradation and deforestation. Using a computer algorithm applied to satellite images from Landsat and Sentinel, the NDFI highlights the forest scars left by logging. This includes the opening of roads, the construction of yards and the removal of trees, which are clear signs of human intervention in the forest. It is especially useful in tropical forests, where it identifies the impacts of logging infrastructure and damage to the tree canopy.

Image: An example of how NDFI can detect logging using Landsat satellite images, left, which is complemented by Planet imagery, right, showing a selectively harvested logging site, with roads in evidence and a stockyard.

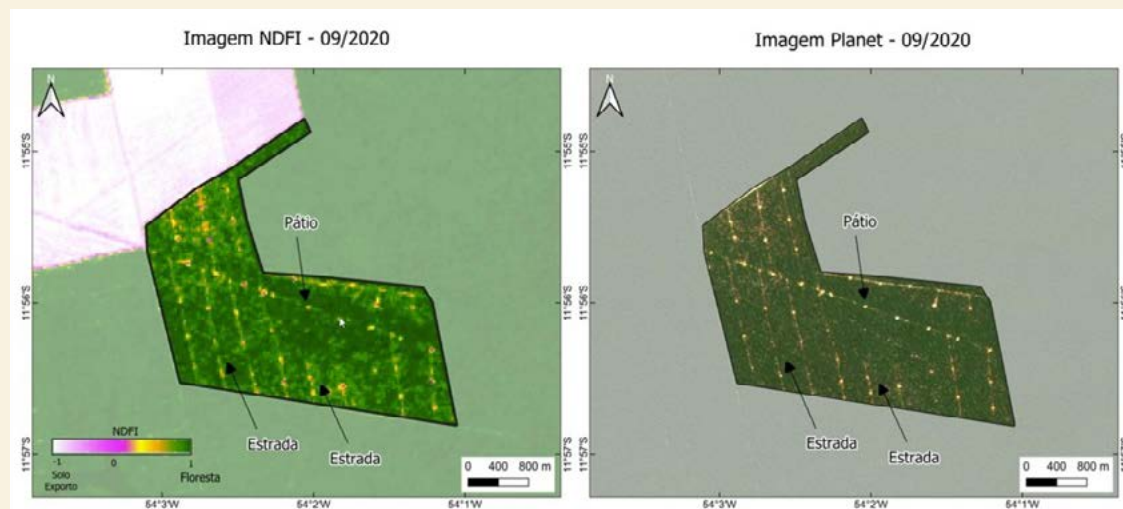
It is a method recognized and used by the Brazilian Amazon state of Pará's environmental secretariat (SEMAS)⁹¹, Brazil's environmental inspection agency (Ibama)⁹² and Space Agency (INPE)⁹³ to detect illegal logging. The NDFI was complemented with additional visual verification using Planet satellite imagery. Additionally, we used high-resolution images from the Planet satellite when clouds obstruct visibility or when Landsat or Sentinel satellite images are unavailable for the analyzed period. This strategy ensures continuity and accuracy in mapping logging scars in the harvest area, enabling an effective analysis of the presence or absence of logging activity. This analysis unearthed two harvest area with no signs of logging.

This was backed up by analysis of the harvest area's supervision documents, where available, and interviews with experts to identify further illegalities and signs of laundering.

The sum of this analysis provides compelling evidence that timber laundering likely occurred in each of the case studies, as well as other illegalities, warranting official investigations.

Volumes of timber exports that did not count on a certificate for secondary transformation forest products

Through freedom of information (FOIA) requests to all relevant Regional Environmental Authorities in Colombia (known as the Corporaciones Autónomas Regionales) and to the Environmental Public Establishments (known as the Establecimientos Públicos Ambientales or unidades ambientales de los grandes centros urbano) EIA, in collaboration with independent media outlet Agenda Propia, was able to obtain documents on all the secondary processed forest product certificates that were granted to timber companies between 2020 and 2023. EIA also obtained additional data from Colombia's tax and customs agency's website (Dirección de Impuestos y Aduanas



Nacionales – DIAN) on all timber exported abroad over the same period, organized by HS CODEs and with the names and unique company identifier codes (NIT). These two data sets were then compared, focusing on the HS CODE 4409, which refers to flooring and decking products and which is considered a secondary processed product by CITES. This comparison enabled us to arrive at all of the statistics cited in the relevant parts of the report as well as on the illustrative tables provided. These datasets and documents are available upon request.

Company responses

As part of its investigation, EIA contacted both exporters and importers to share the the main findings presented in this report and to offer an opportunity to respond. Los Cedros Hardwood Flooring responded that it possesses all the required certificates – though it did not provide copies. The company also denied any involvement in payments to armed groups. Lumber Plus, a U.S. importer, replied stating that its Colombian supplier, Maderas Santa Rita, provides documentation on the timber’s origin, which Lumber Plus reviews prior to purchase. The company shared with EIA a flow diagram (fluxogram) of timber exports covering January to February 2023, several timber transport permits, a document requesting approval for a logging area, and other official documents relating to Maderas Santa Rita’s operations. However, despite EIA’s request, no certificates for secondary processed products were included. No other companies responded to the allegations. All responses received are published in full on the *Decking the Forest* [webpage](#). Any further responses submitted after publication will also be made available there.

Legal update

Our report is based on a law that will be replaced on May 16, 2025, by [Resolution 1489 of 2024](#), issued by Colombia’s Ministry of Environment. The new law eliminates the requirement for certificates for exports of secondary processed timber. Instead,

exporters will issue their own document – the Remisión de Empresa Forestal (REF) – based on a registered digital ledger, the [Libro de Operaciones Forestales en Línea](#) (LOFL), which records timber inputs, outputs, inventory, origin, and processing. Although the LOFL is subject to oversight for accuracy, the REF contains no information enabling third parties to trace products back to their forest origin, reducing transparency and traceability – and weakening environmental safeguards.



ENDNOTES

- 1 WWF-Colombia. 2014. Landscape management in Chocó-Darién priority watersheds. Page 5. Available [here](#).
- 2 Fagua, J. C., Baggio, J. A., and Ramsey, R. D. 2019. Drivers of forest cover changes in the Chocó-Darién Global Ecoregion of South America. *Ecosphere* 10(3): e02648. Abstract, page 1. Available [here](#).
- 3 See: [BOLETIN_FORESTAL_SEPTIEMBRE_WEB1.pdf \(fedemaderas.org.co\)](#)
- 4 See: [ilegalidadmadera_m3_b18_c5_web.pdf \(d2ouvy59p0dg6k.cloudfront.net\)](#)
- 5 International Crisis Group. 2019. Calming the Restless Pacific: Violence and Crime on Colombia's Coast. Executive Summary. Available [here](#).
- 6 Ibid, paragraph 60.
- 7 "Colombia: Briefing Departamental, Chocó, enero a junio de 2022" Available [here](#).
- 8 Movimiento Sueco por la Reconciliación SweFOR." Consejo Comunitario Mayor de la Asociación Campesina Integral del Atrato (COCOMACIA)". <https://swefor.org/es/colombia/organizaciones-acompanamos/cocomacia/#:~:text=Fundado%20en%201982%2C%20este%20proceso,de%20alrededor%20de%2045.000%20personas>
- 9 See: <https://cites.org/eng>
- 10 Decreto 1791 de 1996 - Gestor Normativo - Función Pública (<funcionpublica.gov.co>)
- 11 ANLA, https://www.anla.gov.co/01_anla/noticias/1116-el-salvoconducto-unico-nacional-en-linea-sunl-permite-la-movilizacion-de-especimenes-de-la-diversidad-biologica-dentro-del-territorio-nacional
- 12 Forsaken Forest, EIA, 2019
- 13 EIA 2019 field investigation. Meeting with exporter in Cartagena, Colombia.
- 14 EIA, 2019 field investigation. Meeting with a family member and legal representative of Los Cedros network of companies, Colombia.
- 15 EIA Freedom of information requests to all the EPAs and CARs on the certificates. Please request these from EIA if needed.
- 16 Dirección de Impuestos y Aduanas Nacionales (DIAN), in an excel sheet. Please request this from EIA.
- 17 DIAN <https://www.dian.gov.co/>; the export data was aggregated into one excel sheet: in an excel sheet. Please request this from EIA.
- 18 Ministerio del Ambiente, ANLA, [Resolution 1367 of 2000](#)
- 19 Ministerio del Ambiente, articles 64 to 68 of [Decree 1791 of 1996](#).
- 20 EIA, Freedom of information requests to all the CARs and EPAs responsible for providing the certificate. Please request these from EIA.
- 21 EIA, 2019 field investigation. Meeting with the legal representative of Los Cedros' network of companies, Colombia.
- 22 Los Cedros, <https://www.loscedros.com.co/en/>
- 23 Official information obtained by EIA from Colombia's Department of Tax and Customs (DIAN) at the following publicly available link: <https://www.dian.gov.co/dian/cifras/Paginas/Bases-Estadisticas-de-Comercio-Exterior-Importaciones-y-Exportaciones.aspx>. EIA scraped the data and combined all HSCODES 44 into an excel sheet to arrive at the stated figure: Please request this from EIA
- 24 For example, names appears as a Principal for the US/Connecticut based company Amazon Hardwoods, registered in Connecticut's Official State website as an LLC company, [onlineBusinessSearch \(ct.gov\)](#) and [Salesforce](#); the family names mentioned there are also reportedly owners of the importers of timber [Cedro Rojo Investment LLC](#) which is incorporated in Florida
- 25 EIA, 2019 field investigation. Meeting with the legal representative of Los Cedros' network of companies, Colombia.
- 26 EIA, documents downloaded by EIA from "Informacion de Empresas" in Colombia, a service that provides corporate information. Please request these from EIA.
- 27 EIA Freedom of Information Requests to the EPA Cartagena, showing the transport permits that provide information on the harvest areas of origin of Los Cedros' timber. Please request these from EIA.
- 28 EIA, 2019 field investigation. Meeting with the legal representative of Los Cedros' network of companies, Colombia.
- 29 Treasury Sanctions Los Urabenos Leadership, United States Department of the Treasury, July 23, 2014. Press Release available: <https://home.treasury.gov/news/press-releases/jl2577#:~:text=Los%20Urabenos%20is%20the%20largest,extortion%2C%20and%20drug%20debt%20collection>.
- 30 See: <https://insightcrime.org/colombia-organized-crime-news/aguilas-negras/>
- 31 See: [105-colombia-gaitanistas.pdf \(crisis-group.org\)](#)
- 32 See: <https://insightcrime.org/colombia-organized-crime-news/aguilas-negras/>
- 33 EIA, 2019 field investigation. Meeting with the legal representative of Los Cedros' network of companies, Colombia.
- 34 EIA, 2019 field investigation. Meeting with representative of Comercialización y Exportación de Madera en Bruto (CICLOND) in Cartagena, Colombia.
- 35 EIA, 2019 field investigation. Meeting with the legal representative of Los Cedros' network of companies, Colombia
- 36 EIA, 2019 field investigation. Meeting with the legal representative of Los Cedros' network of companies, Colombia.
- 37 EIA 2019 field investigation. Meeting with the mentioned anonymised timber exporter , Cartagena, Colombia.
- 38 EIA, 2019 field investigation. Meeting with the legal representative of Los Cedros' network of companies, Colombia.
- 39 CODECHOCO, [Sede Electrónica CodeChocó](#)
- 40 CORPOURABA, [Quienes somos - CORPOURABA](#)
- 41 EIA evidence of freedom of information requests to the port of Cartagena and relevant regions – request these to EIA and data extracted from Colombia's DIAN authority, summarised here: in an excel sheet. Please request this from EIA.
- 42 Excel sheet. Please request this from EIA.
- 43 US: Lacey Act; EU: European Union Timber Regulation (soon to become part of the European Union Deforestation Regulation); Canada: Wildlife and Forests Protection Act
- 44 EIA field investigation.
- 45 Bizapedia profile of Interdecking LLC. Available here. The legal representative of various o Los Cedros network of companies EIA met with appears as co-owner of Interdecking and told us verbally he was a co-owner.
- 46 EIA Meeting with Chalas Lumber confirmed its link to the Los Cedros network
- 47 EIA field investigation
- 48 DIAN <https://www.dian.gov.co/>; the export data was aggregated into one excel sheet: Please request this from EIA
- 49 DIAN, Bases Estadísticas de Comercio Exterior – Importaciones y Exportaciones, <https://www.dian.gov.co/dian/cifras/Paginas/Bases-Estadisticas-de-Comercio-Exterior-Importaciones-y-Exportaciones.aspx>; the export data was scraped from that hyperlink and then aggregated into one excel sheet, which enabled EIA to do the analysis and arrive at the stated figures, which anyone can replicate: Please request this from EIA.
- 50 [MADERAS SANTA RITA | Colombian B2B Marketplace](#)
- 51 Global Forest Watch, [Colombia Deforestation Rates & Statistics | GFW](#)
- 52 EIA interview with Maderas Santa Rita's General Manager, also confirmed by data EIA scraped from Colombia's Customs agency DIAN, available in excel format: Please request this from EIA.

- 53 Sawmill timber entry registries, obtained by EIA via FOI requests. Please request these from EIA.
- 54 EIA FOI requests to the regional environmental authority of the region of Choco: CODECHOCO, Please request this from EIA.
- 55 Sawmill timber entry registries, obtained by EIA via FOI requests from the EPA Baranquilla
- 56 Official registries of timber entries to Maderas Santa Rita's sawmill accessed by EIA shows that one of the areas it sources its timber from is a community area called Consejo Comunitario del Rio Curvarado, which is categorised as an "Area de Aprovechamiento persistente" (Persistent Timber Harvest), <https://acrobat.adobe.com/id/urn:aaid:sc:EU:6f276753-5161-4119-9c25-66245cba707b>. Under Article 5 of *Decreto 1791 de 1996 - Gestor Normativo - Función Pública* (funcionpublica.gov.co), Persistent Timber Harvest áreas are, according to this law "those that are carried out with sustainability criteria and with the obligation to maintain the normal yield of the forest using silvicultural techniques that allow for its renewal. By normal yield of the forest, it is understood as its sustainable development or production, in such a way that the permanence of the forest is guaranteed." EIA infers that given the conservation criteria, any deforestation in these areas would contravene these conservation requirements.
- 57 Sawmill timber entry registries, obtained by EIA via FOI. The transport permits are referred to in the excel sheet we obtained of the firms' sawmill entries for Choiba and this was compared to official transport permits we obtained from CODECHOCO, where the number of the transport permit coincided (each transport permit has a unique number). You can replicate this analysis by looking at the sawmill entries using columns C and L, with column C referring to the number of the transport permit that arrived into the sawmill, and column L providing a link to an excel sheet we obtained via FOI from CODECHOCO – the regional environmental authority, of all timber transported from harvest areas, with Columb B providing the number for the transport permit and column E providing the name of the harvest area and its unique identifying number.
- 58 CONSEJO DE ESTADO
- 59 'Territory is Everything': Afro-Colombian Communities, Human Rights and Illegal Land Grabs – Columbia Human Rights Law Review
- 60 CONSEJO DE ESTADO
- 61 Curbaradó y Jiguamiandó: el reto sigue vigente, la restitución de tierras | PBI Colombia (spanish) (pbicolombiablog.org)
- 62 6-18MC140-14-CO.pdf (oas.org)
- 63 According to: *Decreto 1791 de 1996* – "Clases de aprovechamiento forestal Artículo 5º.- Las clases de aprovechamiento forestal son: b) Persistentes. Los que se efectúan con criterios de sostenibilidad y con la obligación de conservar el rendimiento normal del bosque con técnicas silvícolas, que permitan su renovación. Por rendimiento normal del bosque se entiende su desarrollo o producción sostenible, de manera tal que se garantice la permanencia del bosque; (Types of Forest Utilization - Article 5º.- The types of forest utilization are: b) Persistent: Those carried out with sustainability criteria and with the obligation to maintain the normal yield of the forest using silvicultural techniques that allow its renewal. "Normal forest yield" is understood as its sustainable development or production, in such a way that the permanence of the forest is guaranteed.). The harvest area of the community is define as "Persistent" in the following document: <https://acrobat.adobe.com/id/urn:aaid:sc:EU:6f276753-5161-4119-9c25-66245cba707b>
- This means any deforestation is not permitted in such an area.
- 64 See: <https://acrobat.adobe.com/id/urn:aaid:sc:EU:6f276753-5161-4119-9c25-66245cba707b>
- 65 *Land restitution in the Curbarado river basin | PBI Colombia (English)* and *Comisión Inter-ecclesial de Justicia y Paz » Control territorial por paramilitares de las AGC en Territorios Colectivos de Curvaradó, Jiguamiandó y Peguita Mancilla, despojo de tierras y riesgo de la integridad de las comunidades del Consejo Mayor de Jiguamiandó por la senadora María Fernanda Cabal* (justiciaypazcolombia.com)
- 66 See: <https://acrobat.adobe.com/id/urn:aaid:sc:EU:6f276753-5161-4119-9c25-66245cba707b>
- 67 DIAN, Bases Estadísticas de Comercio Exterior – Importaciones y Exportaciones, <https://www.dian.gov.co/dian/cifras/Paginas/Bases-Estadisticas-de-Comercio-Exterior-Importaciones-y-Exportaciones.aspx>; the export data was aggregated into one excel sheet: Please request this from EIA.
- 68 xUS Lacey Act, 16 USC Ch. 53: CONTROL OF ILLEGALLY TAKEN FISH AND WILDLIFE
- 69 DIAN <https://www.dian.gov.co/>; the export data was aggregated into one excel sheet: Please request this from EIA.
- 70 Brazilian Lumber, *Buy Cumaru » Brazilian Lumber*
- 71 DIAN <https://www.dian.gov.co/>; the export data was aggregated into one excel sheet: Please request this from EIA.
- 72 EIA interview, posing as potential clients, with Maderas Santa Rita's General Manager, 2023.
- 73 EIA investigation and interview with Brazilian Lumber's Senior Manager
- 74 DIAN <https://www.dian.gov.co/>; the export data was aggregated into one excel sheet: Please request this from EIA.
- 75 Lumber Plus, <https://lumberplus.com/home/decking/hardwood/cumaru/>
- 76 U.S. DEPARTMENT OF AGRICULTURE, *Animal and Plant Health Inspection Service*, What is meant by the term "due care?": "The Lacey Act, as amended, makes it a crime to traffic in plants or plant products when, in the exercise of due care, the person should know that the plant or plant product was taken, possessed, transported or sold illegally. "Due" care is a long-standing legal principle that means the degree of care at which a reasonably prudent person would take under the same or similar circumstances. The Lacey Act does not define nor mandate any requirements to constitute due care. U.S. importers have discretion to determine how to best verify the legitimacy of their supply chain going back to where the plant material was taken, and the legality of transactions thereafter, and to abide by plant protection and conservation laws in the United States and abroad."
- 77 C.I. Casa en Madera, <https://cicasaenmadera.com/>
- 78 Resolución N° 1709 de la Corporación para el Desarrollo Sostenible del Sur de la Amazonia, 17-12-2021, <https://vlex.com.co/vid/resolucion-n-1709-corporacion-879173939>. Additional interviews by EIA, confirmed Losada was the owner of CI Casa en Madera.
- 79 Information downloaded by EIA from CORPOAMAZONIA's website of official documents, available on the following link: <http://www.corpoamazonia.gov.co:85/sisa/actividades/Estadistica.php>
- 80 DIAN, Bases Estadísticas de Comercio Exterior – Importaciones y Exportaciones, <https://www.dian.gov.co/dian/cifras/Paginas/Bases-Estadisticas-de-Comercio-Exterior-Importaciones-y-Exportaciones.aspx>; the export data was aggregated into one excel sheet: Please request this from EIA.
- 81 DIAN, Bases Estadísticas de Comercio Exterior – Importaciones y Exportaciones, <https://www.dian.gov.co/dian/cifras/Paginas/Bases-Estadisticas-de-Comercio-Exterior-Importaciones-y-Exportaciones.aspx>; the export data was aggregated into one excel sheet: Please request this from EIA.
- 82 See section II of report
- 83 *US Company Pleads Guilty to Importing Illegal Timber from Peru - EIA US*
- 84 Notes from a meeting by EIA investigators, with the referred to individuals.
- 85 Information downloaded by EIA from CORPOAMAZONIA's website of official documents, available on the following link: <http://>

www.corpoamazonia.gov.co:85/sisa/actividades/Estadistica.php

- 86 EIA obtained these from the regional environmental authority CORPOAMAZONIA. Please request these from EIA.
- 87 EIA commissioned an NDFI expert with 25 years of experience of monitoring logging through satellite imagery and that uses NDFI. Please request these from EIA, See methodology and results of the NDFI/NDVI works in Annex 1
- 88 Information downloaded by EIA from CORPOAMAZONIA's website of official documents, available on the following link: <http://www.corpoamazonia.gov.co:85/sisa/actividades/Estadistica.php>
- 89 Information downloaded by EIA from CORPOAMAZONIA's website of official documents, available on the following link: <http://www.corpoamazonia.gov.co:85/sisa/actividades/Estadistica.php>
- 90 EIA requested an ex-supervisor from OSINFOR to read the inspection report and arrive at a conclusion
- 91 See: <https://semas.pa.gov.br/legislacao/files/pdf/163269.pdf>
- 92 Interview with an Ibama official in Parana. Please ask EIA for details if needed.
- 93 See: <http://marte.sid.inpe.br/col/dpi.inpe.br/marte/2011/07.15.13.58/doc/p0589.pdf>
- 94 6-18MC140-14-CO.pdf (oas.org)





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