



木材合法性风险概览：中国

2022年7月编制

合法性风险总结

风险分数：37.7（中等风险^a）¹

冲突状态：无²

现行原木或锯材出口限制：无^b

现行进口管制：无^{3,4,5,c}

- 中国国产工业用材的供应无法满足工业产能的需求，因此需要进口大量木材产品以弥补供应短缺。中国禁止砍伐天然林，来自国内人工林的原材料（主要是杨树、桉树、马尾松、杉木）通常视为低风险林产品。
- 俄罗斯远东地区、北美（美国和加拿大）、北欧/东欧、中国北方地区都生长着相似的温带天然林树种，比如栎树。有证据表明产自俄罗斯远东地区以及乌克兰的高风险材种可能会被申报为产自北欧、北美、甚至是中国（2017年前）的材种，从而被合法化。
- 中国加工木制品所用的木材中超过一半是从其他国家进口的，高风险和低风险的原产地都有。
- 中国目前不要求通过供应链进行木制品的追溯。中国加工产业的规模和性质意味着木材来源常常是多样的，企业没有义务对供应链进行追溯。
- 欧盟和美国的执法结果表明中国生产的产品可能会使用非法木材、被包装为合法化的木材以及谎报树种。

木质林产品贸易概况^{d,e,6}

总进口额（2021）：542.5亿美元

总出口额（2021）：685.8亿美元，其中437.4亿美元（占比63.8%）出口到“有管控的市场”^f

最高风险产品概览

出口 – 2021年出口美国金额最大的产品⁷

- 木质家具-坐具（HS940161、HS940169）
- 纸（HS48）
- 木质家具-其他（HS940360）
- 其他木制品（HS4421）
- 镶嵌木制品及其他木质装饰品（HS4420）
- 木质家具-办公（HS940330）
- 木质家具-卧室（HS940350）
- 胶合板（HS4412）
- 细木工产品（HS4418）
- 餐桌/厨房用具（HS4419）

非法采伐和非法贸易对许多树种都有影响，但受采伐和/或贸易法规保护的高价值树种首当其冲，这些树种通常也是濒危树种，因此非法的可能性会更高。以下木材品种目前或最近在中国受到了保护。

一些中国的濒危树种列入了《濒危野生动植物种国际贸易公约》（CITES）。

列入CITES附录2的本地树种：

- 沉香 (Aquilaria spp.)
- 黄檀 (Dalbergia spp.)
- 红豆杉 (Taxus chinensis, Taxus cuspidata, Taxus fauna, Taxus sumatrana, Taxus wallichiana)

中国自2017年开始禁止天然林商业性采伐。⁸ 中国的森林采伐实行限额制度，在“十三五”规划（2016-2020）期间规定的采伐限额是2.54亿立方米，与“十二五”（2011-2015）期间相比，减少1700万立方米；“十三五”规划还特别规定天然林商业性零采伐。⁹ 总之，所有天然林材种，包括蒙古栎、桦木和松树，都应视为高风险。¹⁰

进口木材：中国木制品加工用材超过一半是从近200个国家进口，^{9,11}来源地跨越温带、热带和北半球北部的森林地带。进口到中国的基本所有热带阔叶材都应视为高风险。选择可靠的第三方认证可以作为减少风险的一个手段，但认证本身不等同于充分的合法性尽职调查。对于温带或北半球北部的木材产品，由于中国出口的木制品可能包含产自俄罗斯远东地区、罗马尼亚以及乌克兰的高风险树种，这些树种会被包装成来自北美、欧洲、甚至是中国的产品，因此也面临着比较高的风险。¹²

列入《濒危野生动植物种国际贸易公约》的进口树种

附录2

- 沉香 (Aquilaria spp., Gyrinops spp.)，产自泰国、印度尼西亚、巴布亚新几内亚、越南
- 圣檀木 (Plectrocarpa sarmientoi (syn. Bulnesia sarmientoi))，产自阿根廷、巴拉圭
- 拉敏 (Gonystylus spp.)，产自马来西亚
- 雪松 (Cedrela spp.)，产自巴西、秘鲁、加纳（人工林）
- 乌木 (Diospyros spp.)，产自马达加斯加
- 黄檀 (Dalbergia spp.)，产自莫桑比克、坦桑尼亚、墨西哥、尼加拉瓜、危地马拉、伯利兹、洪都拉斯
- 巴花 (Guibourtia spp.)，产自中非共和国、加蓬
- 非洲大美木豆 (Pericopsis elata)，产自喀麦隆、刚果共和国、刚果民主共和国、科特迪瓦、加纳、尼日利亚
- 非洲刺李 (Prunus africana)，产自刚果民主共和国^{13,14,15,16,17,18,19}
- 非洲花梨 (Pterocarpus erinaceus)，产自贝宁、布基纳法索、冈比亚、加纳、几内亚、几内亚比绍、马里、尼日利亚、塞内加尔
- 紫檀 (Pterocarpus santalinus)，产自印度

- 血檀 (Pterocarpus tinctorius)，产自莫桑比克、坦桑尼亚、赞比亚²⁰
- 桃花心木 (Swietenia macrophylla)，产自巴西、秘鲁、玻利维亚
- 红豆杉 (Taxus spp.)，全球进口

附录3

- 水曲柳 (Fraxinus mandshurica)，产自俄罗斯联邦
- 蒙古栎 (Quercus mongolica)，产自俄罗斯联邦
- 红松 (Pinus koraiensis)，产自俄罗斯联邦、北朝鲜

以下名单基于公开报告，包含部分可能在中国产品中找到的高风险进口树种：温带阔叶材

- 栎树^{21,22,23,24} (Quercus spp.)，产自俄罗斯联邦、乌克兰
- 桦木²⁵ (Betula spp.)，产自俄罗斯联邦
- 白蜡树^{26,27,28,29} (Fraxinus spp.)，产自俄罗斯联邦
- 山毛榉^{30,31,32} (Fagus spp.)，产自俄罗斯联邦、乌克兰、罗马尼亚

温带针叶材

- 松树^{33,34,35,36,37,38} (Pinus spp.)，产自俄罗斯联邦
- 落叶松^{39,40} (Larix spp.)，产自俄罗斯联邦

热带材

- 柚木^{41,42,43} (Tectona grandis)，产自缅甸
- 印茄木/菠萝格^{44,45,46,47} (Intsia spp.)，产自巴布亚新几内亚、所罗门群岛、印度尼西亚
- 番龙眼⁴⁸ (Pometia spp.)，产自巴布亚新几内亚、所罗门群岛
- 冰糖果⁴⁹ (Calophyllum spp.)，产自巴布亚新几内亚、所罗门群岛
- 奥古曼^{50,51} (Aucoumea klaineana)，产自赤道几内亚、加蓬、刚果共和国
- 沙比利^{52,53} (Entandrophragma cylindricum)，产自喀麦隆、刚果民主共和国
- 蚁木/巴西核桃木⁵⁴ (Tabebuia spp.)，产自巴西
- 贾巴托/栾叶苏木⁵⁵ (Hymenaea courbaril)，产自巴西
- 香二翅豆“巴西柚木”⁵⁶ (Dipteryx spp.)，产自秘鲁

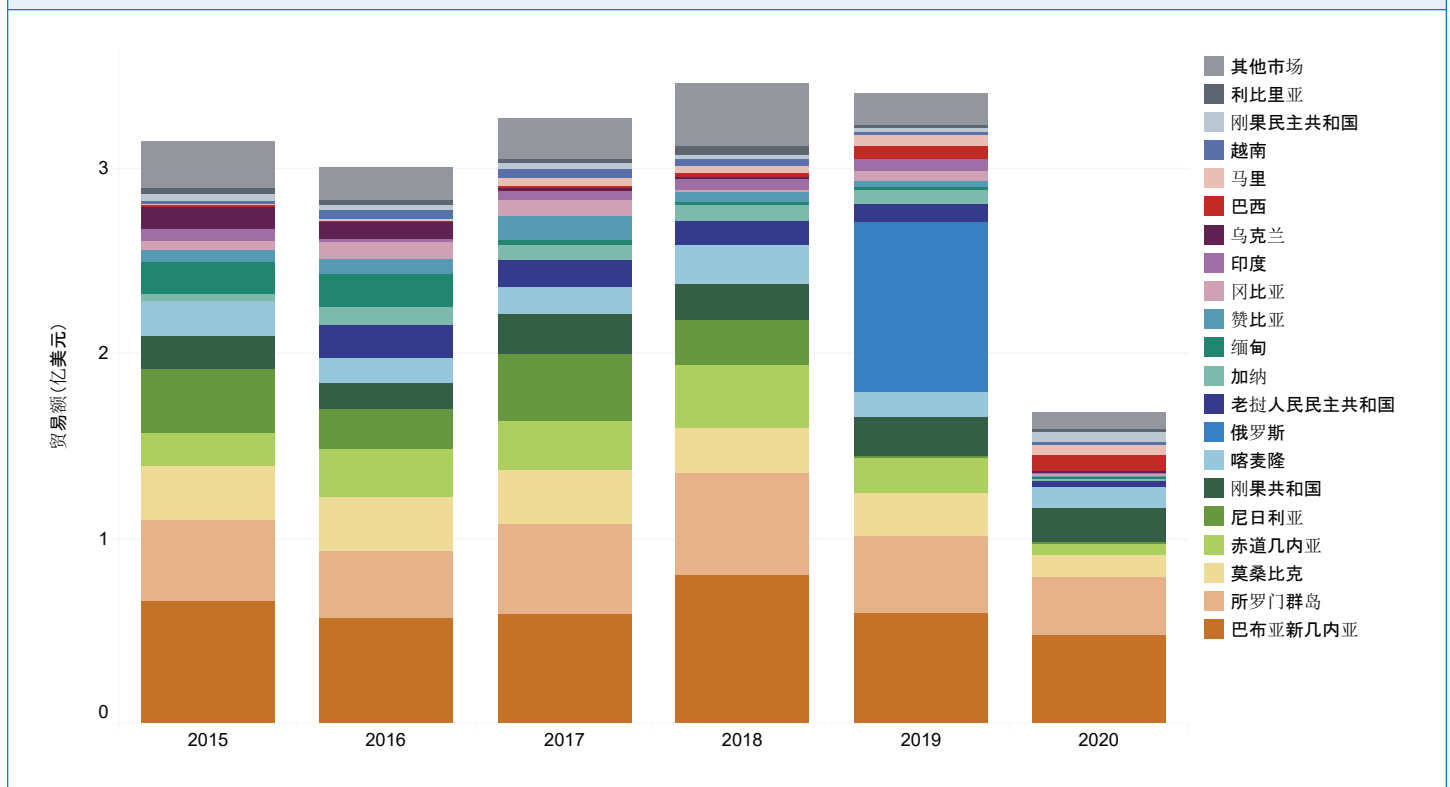


World Forest ID currently has georeferenced samples from over 300 species from over 40 countries. For further details please refer to our public map available at <https://app.worldforestid.org/map>, or contact us at info@worldforestid.org to find out how we can assist in the fight against illegal timber trade.

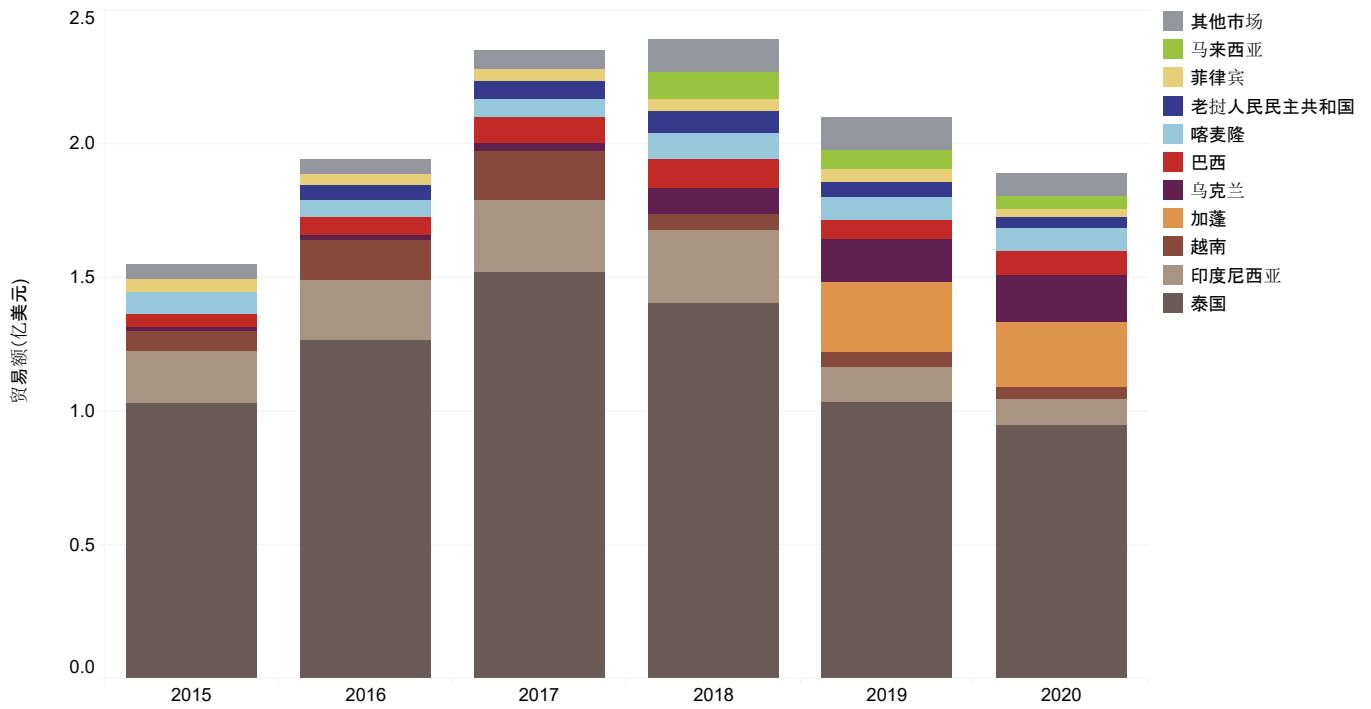
国际市场上大约三分之二的热带材都销往中国。⁵⁷ 根据欧盟森林执法、施政和贸易项目 (EU FLEGT Facility)，中国从实施全面或部分出口管制的国家进口的木材占比很高 (2010-2019年总进口量的15%、总进口额的26%，即300亿美元)，⁵⁸ 这就意味着进口到美国市场的加工产品中可能含有从产地国非法出口的木材。传统上中国进口的主要是原材料，基本所有高价值的热带阔叶材都以原木的形式进入中国市场。随着产地国采取禁止原木出口、对原木出口课税或规定限额等措施，鼓励将能带来附加值的加工环节留在国内，中国进口的锯材以及经部分加工的木材产品数量在逐渐增加。根据欧盟森林执法、施政和贸易项目2020年报道，中国在2010-2020年间从有原木出口限制的国家进口的原木增加了70%，从有锯材出口限制的国家进口的锯材增加了150%。⁵⁹

原木或锯材出口限制意味着需要采取更多的风险评估和措施来保证从这些国家进口的原木或锯材没有违反产地国的法律法规。⁶⁰

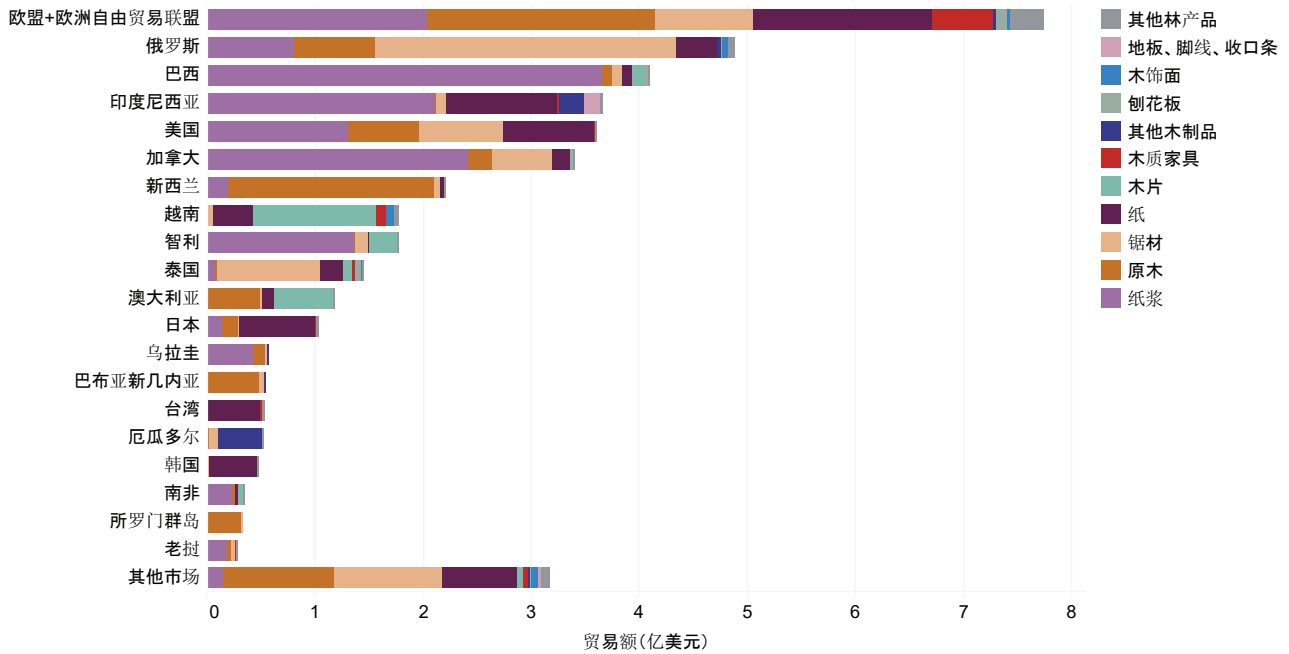
高风险进口：从实施原木出口限制的国家进口原木需要做更多尽职调查⁶¹ (2015-2020)⁶²



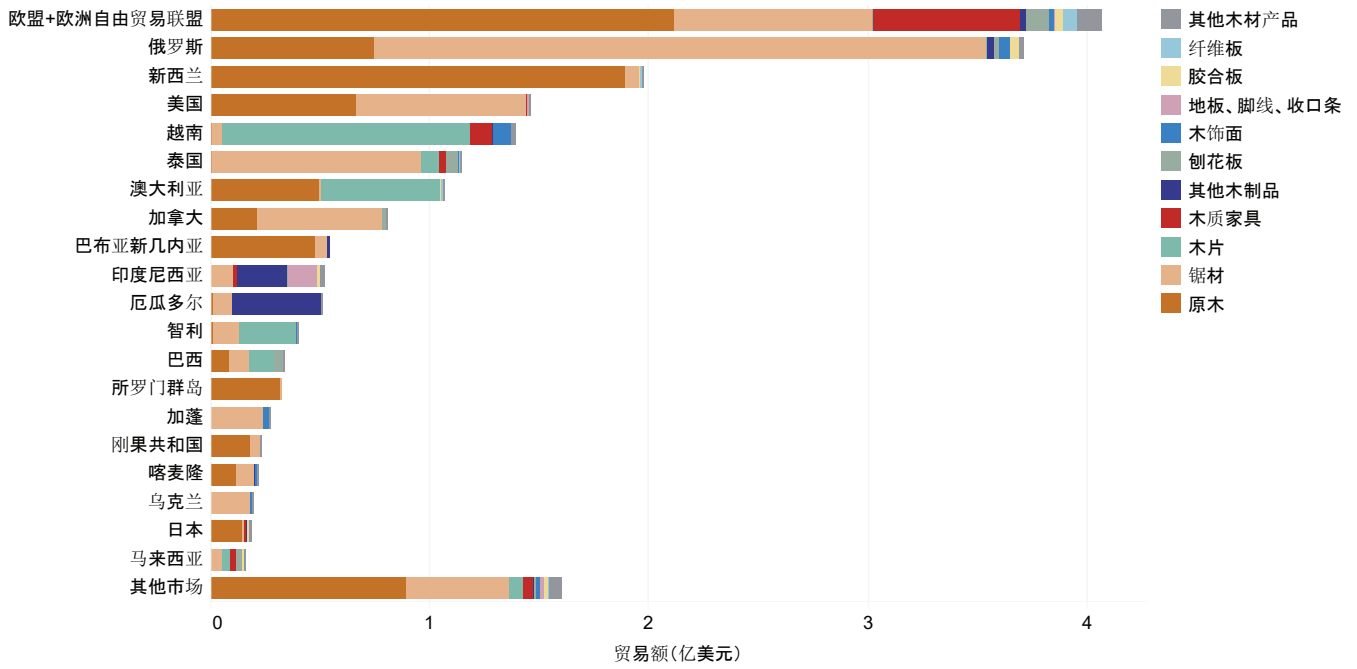
高风险进口：从实施锯材出口限制的国家进口锯材需要做更多尽职调查⁶³（2015-2020）⁶⁴



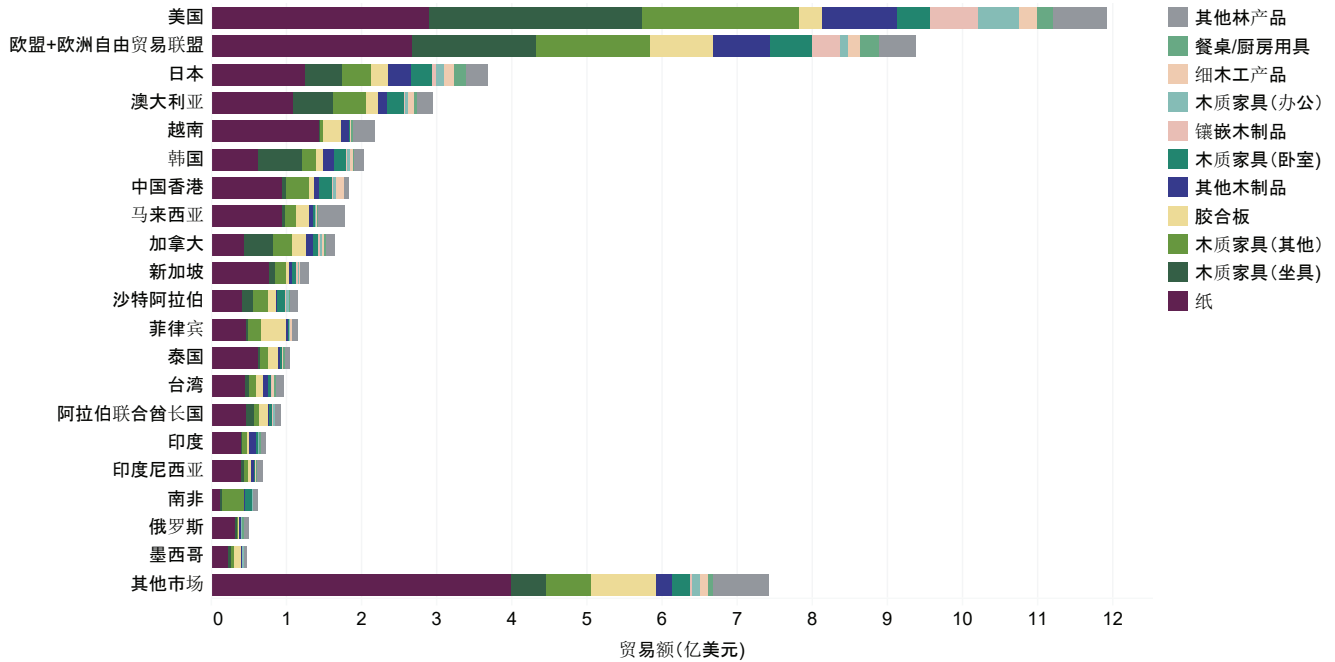
中国林产品进口额最大的来源地（2020）^{1, 65}



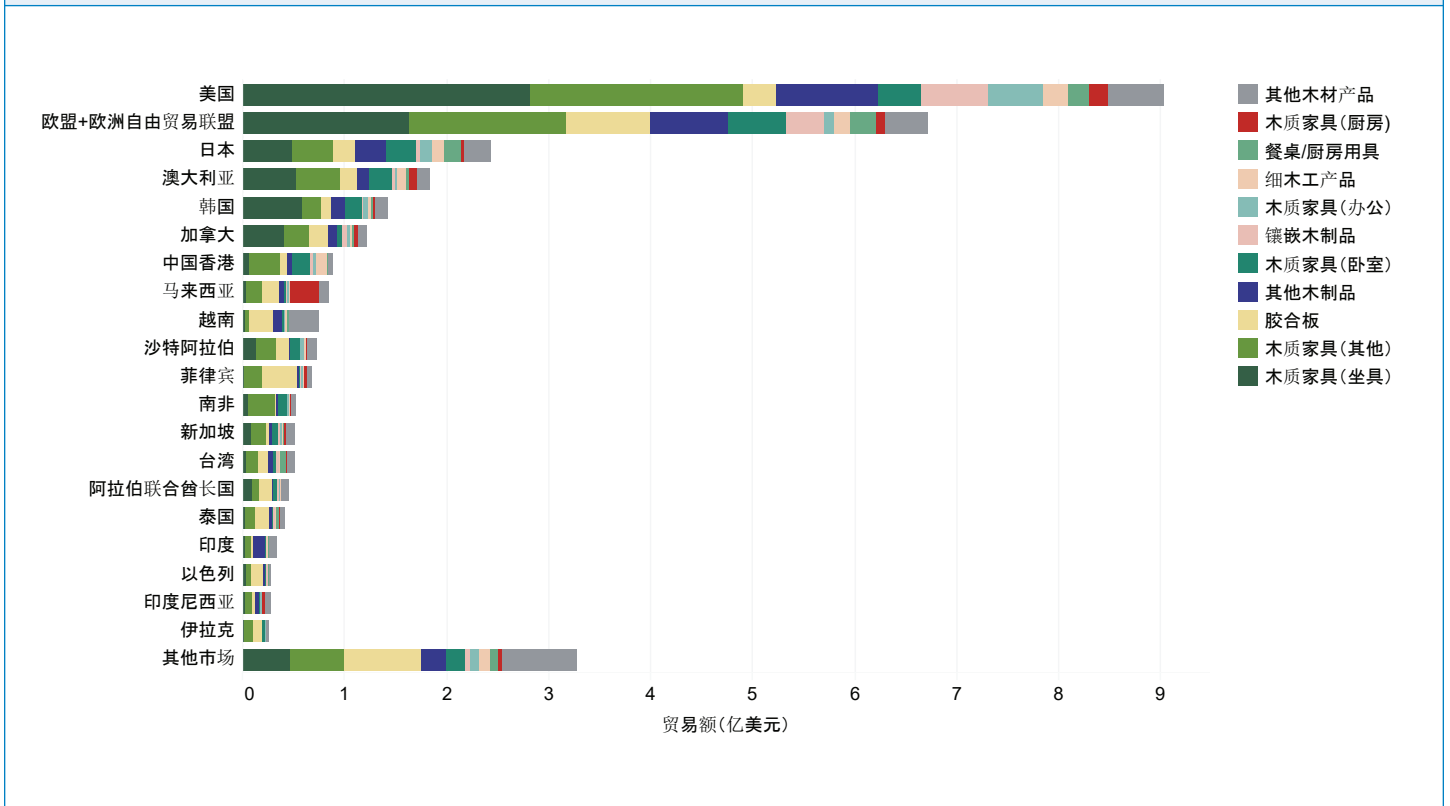
中国木材产品进口额最大的来源地 (2020) ⁶⁶



中国林产品出口额最大的市场 (2020) ⁶⁷



中国木材产品出口额最大的市场（2020）⁶⁸



林业

森林覆盖面积：2.2亿公顷（13.8%为保护区）^{69,70}

森林砍伐率：每年-0.93%（净造林）⁷¹

森林权属：⁷²

- 公有1.23亿公顷（57%）
- 私有8700万公顷（43%）

森林认证：

- FSC认证：129万公顷（2022）⁷³
- PEFC认证：110万公顷（2021）⁷⁴
- FSC-PEFC双认证：9.8万公顷（2020）⁷⁵

产量：⁷⁶

- 原木：1.817亿立方米（2020）
- 薪材：1.5699亿立方米（2020）
- 木片：1.4838亿立方米（2020）
- 锯材：8404万立方米（2020）
- 胶合板：6846万立方米（2020）
- 纤维板：5883万立方米（2020）
- 刨花板：3337万立方米（2020）
- 木皮：273万立方米（2020）
- 纸：2.9173亿公吨（2020）
- 纸浆：3056万公吨（2020）
- 回收木材：200万公吨（2020）
- 木炭：161万公吨（2020）

- 中国国产工业用材的供应无法满足工业产能的需求，因此需要进口大量木材产品以弥补供应短缺。中国禁止砍伐天然林，来自国内人工林的原材料（主要是杨树、桉树、马尾松、杉树）通常视为低风险林产品。

在过去二十年间，中国政府颁布了一系列严格措施来保护国内森林，2017年彻底禁止了对天然林的商业性砍伐。⁷⁷ 疏伐抚育作业也在减少。禁伐以来，包括蒙古栎和桦木在内的国产阔叶材种供应急剧减少，⁷⁸ 市场上很少有栎树、桦树、松树和落叶松等产自天然林的材种。

大部分国产木材（杨树、桉树、马尾松、杉树）都产自人工林。^{79,80}

- 俄罗斯远东地区、北美（美国和加拿大）、北欧/东欧、中国北方都生长着相似的温带天然林树种，比如栎树。有证据表明产自俄罗斯远东地区以及乌克兰的高风险材种可能会被申报为产自北欧、北美、甚至是中国（2017年前的材种，从而被合法化。

中国增加了从其他国家、特别是从俄罗斯联邦及乌克兰，进口这类阔叶材。这些材种被谎报为产自北美或欧洲低风险国家的可能性增大。⁸¹ 因此，通过中国将产自俄罗斯的材种合法化的风险是很高的，特别是松木、落叶松、栎木、白蜡木、桦木。^{82,83,k}

在中国东北进行的初步研究表明天然林禁伐让木材加工企业无法获得当地的木材，家具厂转而采用从陆路进口的俄罗斯木材以及从海路进口的其他产地的木材。⁸⁴

- 中国生产的木制品中超过一半是从其他国家进口的木材，高风险和低风险的原产地都有。

中国是世界最大的木制品进口国，也可能是从有非法采伐风险的国家进口木材最多的国家。^{85,86,87,88,89,90,91,92,93,94,95,96,97,98,99,100,101,102} 中国还没有制定强制措施阻止非法木材的进口，这就意味着中国加工的产品中含有非法木材的风险很高，比如胶合板、细木工产品、家具制品等。《中华人民共和国森林法》于2019年12月修改，2020年7月1日生效，其中第65条规定禁止购买、加工、运输非法来源的木材。从技术上说该法已经生效两年多了，但只有在国务院批准颁布实施条例之后，中国的《森林法》才会真正得到实施。¹⁰³

2022年7月，内部草拟实施条例近一年、《森林法》生效两年之后，国家林业和草原局发布通知，给与一个月时间征求公众对实施条例的意见。但实施条例没有包含对第65条的进一步解释，没有说明它是否适用于进口以及国产材，也没有说明需要采取哪些措施来执行该条例，比如尽职调查体系、可追溯性的要求或罚款等一些国际组织所期待的措施。¹⁰⁴

中国进口的原木和锯材很大一部分是来自有明确证据表明非法采伐风险很高的国家，这些国家在治理以及腐败方面的全球排名都靠前。¹⁰⁵ 2020年中国主要的高风险原木供应国包括俄罗斯联邦（占中国原木进口总量的11%）、巴布亚新几内亚（占4.4%）、所罗门群岛（占3.4%）、巴西（占1.4%）、刚果共和国（占1.0%）、阿根廷（占0.8%）以及喀麦隆（占0.7%）。¹⁰⁶ 其中，中国从俄罗斯联邦的进口量占从所有高风险国家进口量的42%，从以上七个国家的原木进口总和占从所有高风险国家进口量的90%。¹⁰⁷ 鉴于西方国家对俄罗斯进行贸易制裁，2022年中国从该国的木材进口可能会增加。¹⁰⁸

2020年，中国90%的锯材进口量来自俄罗斯联邦（45.8%）、欧盟+欧洲自由贸易联盟（12.4%）、泰国（10.2%）、加拿大（8.9%）、美国（5.9%）、乌克兰（3.0%）、白俄罗斯（1.8%）以及加蓬（1.6%）。¹⁰⁹

根据欧盟森林执法、施政和贸易项目（EU FLEGT Facility）对中国2010-2019年贸易的分析，中国木材产品进口的50%来自高风险国家。这一比例在过去十年间呈下降趋势，不过从有治理问题的国家进口的绝对量增加很多。¹¹⁰

根据世界银行的名单，这些国家中许多都处于脆弱且受冲突影响的状态，¹¹¹ 意味着这些国家的政府面临着很大的法治问题。政府官员的贪腐使得与森林保护管理相关的法律法规未能有效执行，从而增加了购买非法木材的风险。¹¹²

- 中国目前不要求通过供应链进行木制品的追溯。中国加工产业的规模和性质意味着木材来源常常是多样的，企业没有义务对供应链进行追溯。

目前中国还没有强制性的、严格的监管链体系对木材原材料从产地国到加工为成品的全过程进行追溯，根据目前公布的《森林法》2019年修订版实施条例草案来看，该条例不太可能包含追溯性的要求。中国的木材加工企业非常多（超过10万家），许多都是专注于某一环节生产的中小企业。¹¹³ 从不同国家进口的木材常常在加工时混在一起，不同生产环节之间没有或几乎不可追溯。例如一项针对进口非洲木材的中国企业的调查显示，转换为合法采购来源的进展微乎其微。^{114,115} 比如，不到一半的参与调查的企业可以轻易识别他们是从哪个或哪些国家进口的原材料。只有14%的企业意识到他们在进口列入《濒危野生动植物种国际贸易公约》的树种，不到四分之一的企业会安排专人做供应链透明度管理、尽职调查和/或企业社会责任。¹¹⁶

这意味着即使有木材产品合法性证书或文件，这些证书或文件仍有可能无法证明实际购买木材的合法性。^{117,118} 根据EL PAÍS/Planeta Futuro的一项调查，有证据表明在刚果民主共和国北部的中国企业用相当于空白支票的许可证非法采伐自然资源。这些公司与官员勾结，采伐并出口濒危树种。作为刚果大美木豆过去四年的主要进口国之一，如果CITES

出口许可证以及相应的砍伐许可没有被篡改的话，中国很有可能出口了看起来是合法的木材。¹¹⁹ 但是，由于缺乏强制性的、可执行的法律，中国很难有更好的方法追溯非法木材进口。^{123,124}

在过去10年，中国制定了几个木材合法性认定自愿性标准，这些标准被认为是通向强制性法律的途径。^{120,121,122} 《中国木材合法性认定体系》（2011）提出了通过政府主导以及行业协会主导的方式来验证合法性。2015年制定的《中国合法性认定标准》包含了尽职调查的内容；后来，中国林产工业协会制定了一个单独的标准，适用于协会的成员企业。这些工具提升了中国企业的能力，但是它们都是自愿性的，不遵守并不会带来后果。

对于国内人工林来说，尽管非法采伐的风险很小，但将合法、非法来源的木材混在一起加工意味着在大范围的加工产品中非法的风险增加了。

- **欧盟和美国的执法结果表明中国生产的产品可能会使用非法木材、被包装为合法的木材以及谎报树种。**

在美国，林木宝公司（Lumber Liquidators, Inc.）进口了在俄罗斯远东非法砍伐的木材、在中国制作成地板，然后以虚假产地申报运输到美国，该公司为此在2016年根据《雷斯法案》接受法庭判决。¹²⁵

英国政府于2015对来自中国的胶合板开展执法行动，发现胶合板有很高的风险，“因为供应链很长，用于生产胶合板的木材来源于非法砍伐的树种，特别是非洲”。¹²⁶ 在对13个产品的检验中，9个胶合板产品所含树种与公司的申报不符，这意味着非法木材进入供应链的风险加大。¹²⁷

美国和欧盟的执法官员和私营企业越来越意识到这些风险。根据一项针对政府机构在2015年10月至2016年9月间的执法活动调查，在纠正违规的执法行动（如整改要求、禁制令和/或罚款）中，中国作为产品来源国被点名的次数最多。参与调查的企业/贸易商因为尽职调查风险而改变采购行为，在受影响的国家中，中国作为产品来源国被提及的次数最多。^{128, 129}

这些市场要求让中国的出口企业感受到了压力，促使部分行业协会为成员企业开发工具来保证合法采购和供应链追溯。¹³⁰ 2020年对欧盟五个成员国以及英国的72个受《欧盟木材法案》约束的企业（其中34个从中国进口）开展了一次深入调查，目的是了解自《欧盟木材法案》实施以来企业做出了哪些改变。企业特别提到自《欧盟木材法案》实施以来已经停止从中国进口。20家公司表明在2019年采取了措施减少从中国进口木材产品的风险。许多企业担心热带国家的高风险木材进口会被洗白，有几个公司特别提到“没有办法确保可信用度的尽职调查”。¹³¹

报告和其他资源

相关报告和其他在线工具可以在IDAT Risk网站上查到 <https://www.forest-trends.org/fptf-idat-home/>，这些报告和工具是对本国别报告的补充。

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- ^a 风险评分体现了Preferred by Nature的“木材风险评估”以及森林趋势的国家治理评分。“木材风险评估”对21个与木材合法性相关的法律领域进行违法风险测评；国家治理评分则是对全球211个国家治理和腐败风险给予的平均分值。我们转换了Preferred by Nature的分数以便与森林趋势的国家治理评分兼容，分数越高的国家治理和腐败问题越严重。Preferred by Nature与森林趋势在2021年给66个国家都打了分，我们就把二者的分数平均。对于其他国家，风险分数反应的是森林趋势的国家治理分数。低于25分的国家被视为“低风险”，25-50分的国家为“中等风险”，50分以上的国家为“高风险”。需要注意的是有可能从强治理、“低风险”的国家买到非法木材，也有可能从“高风险”的国家买到合法木材。鉴于此，风险评分只能说明一个国家非法采伐的可能性有多高，最终目的是说明腐败和弱治理会损害林业的法治。
- ^b 原木和锯材出口原则上是不鼓励的。商务部和海关总署每年都公布《出口许可证管理货物目录》。2020年的目录包含了锯材以及42个其他产品种类。锯材出口企业需要向商务部或商务部委派的商务管理机构申请出口许可证。出口企业也需要获得出口限额证明。
- ^c 中国的《森林法》修订版（2019）指出：“木材经营加工企业应当建立原料和产品出入库台账。任何单位和个人不得收购、加工、运输明知是盗伐、滥伐等非法来源的林木。”（第65条）。
- ^d “林产品”是指木材产品（包括家具）以及纸浆和纸，涵盖《综合商品目录》第44、47、48章的产品以及第94章的木家具产品。“林产品”通常包含除木材、木制品以外的产品，比如蘑菇、药材以及野生动植物，但在本报告中“林产品”是指木材产品以及纸浆和纸。
- ^e 除非特别注明，所有贸易统计以及图表中的数据都来自中华人民共和国海关总署，由森林趋势汇编分析。
- ^f 有管制的市场是指制定了限制非法木材进口操作性措施的国家和管辖范围。截至2021年，这些市场包括美国、欧盟成员国（以及冰岛、列支敦士登、挪威、英国、瑞士）、澳大利亚、加拿大、哥伦比亚、印度尼西亚、日本、马来西亚、韩国和越南。有的措施在范围、实施和执法方面更全面一些。
- ^g 中国2018年的林产品总供应量相当于3.87亿立方米的原木。其中，8400万立方米是国产商品材，3.03亿立方米是进口林产品。
- ^h 该树种分布区的所有国家由于存在有记录的、广泛的、普遍的非非法贸易而被提交给CITES常务委员会（CITES的技术机构，负责《公约》的实施）进行审议。由于国际贸易的不可持续而列入“重大贸易审查”（确定贸易是可持续且合法的程序）的树种/国家组合包括：贝宁、布基纳法索、冈比亚、加纳、几内亚比绍、马里、尼日利亚、塞拉利昂。在涉及该树种的贸易中应加大风险评估/尽职调查的力度，因为2022年11月缔约国大会很有可能规定该树种分布区的所有国家出口限额为零。目前从尼日利亚出口的限额为零。
- ⁱ 附录3的物种由一个国家单方面列出（不是所有成员国投票决定），以获取国际合作限制该物种的贸易，这些物种的管控与列入附录2的物种不一样。比如，俄罗斯联邦将水曲柳（*Fraxinus mandshurica*）、蒙古栎（*Quercus mongolica*）（两种都是在2014年列入）和红松（*Pinus koraiensis*）（2010年）列入附录3，这些物种在从俄罗斯联邦出口时需要俄罗斯CITES管理机构的许可，但如果从另一个分布区或缔约国出口只需要产地证明。如果水曲柳（*Fraxinus mandshurica*）从也是原产地的日本或中国出口，则只需要原产地证明，而不是CITES出口许可。
- ^j “欧盟+欧洲自由贸易联盟”是指欧盟的27个成员国以及英国、冰岛、列支敦士登、挪威、和瑞士。
- ^k 许多有关将俄罗斯远东木材包装为中国木材的公开证据都是在中国天然林商业性禁伐（2017年）之前。在2017年禁伐令之后，任何在中国采伐的温带天然林树种都应证明产自人工林，并且在原木和锯材的出口限额之内。

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