

# Illegal Deforestation for Forest-Risk Commodities Dashboard: Nigeria

Drafted as of: June 2022

## SUMMARY OF RISKS

- Governance Risk Score: 83.2 (Higher risk)<sup>a</sup>
- Conflict State: YES (Medium-Intensity Conflict)<sup>1</sup>
- Nigeria's forest area has decreased by 9% since 2000, including a 12% decrease in forest cover in protected areas, despite legal protections, highlighting the challenge of preventing illegal deforestation.<sup>b</sup>
- Agricultural conversion is the main driver of forest loss in Nigeria due to production of beef, millet, rice, cassava, and vegetables, which are mostly sold/consumed domestically.
- Export-oriented cash crops, particularly wood products, cocoa, cashews, and sesame, are also associated with an elevated risk of illegal conversion.
- Policies governing forest conversion and agricultural production are set by Nigeria's 36 states and are not always publicly available, making it challenging to determine the applicable laws country wide.
- Illegal conversion of forest for agriculture is not seen as a priority for law enforcement.
- There are reports of violence tied to land grabbing and conversion and widespread reports of commodity theft across Nigeria.

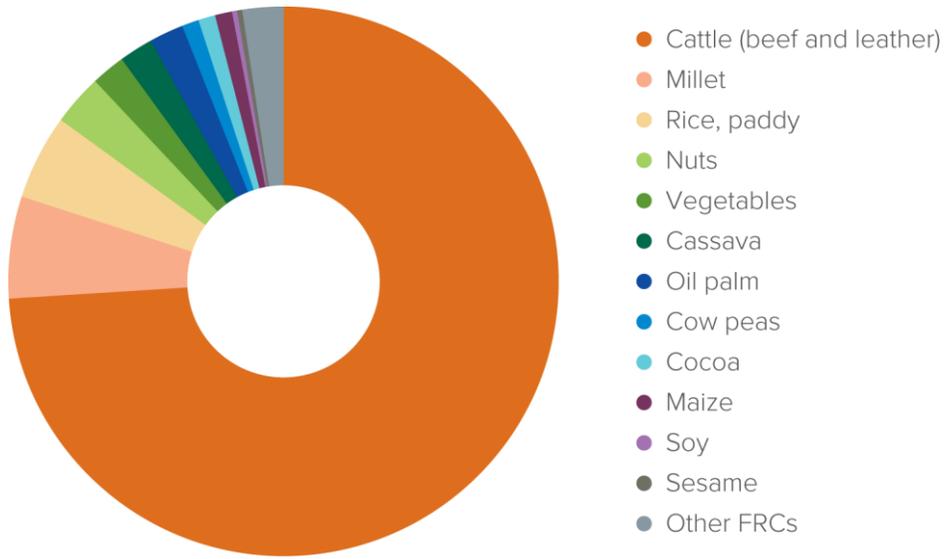
## SUMMARY OF FRCs

- Main forest-risk commodities (FRCs) tied to illegal deforestation due to production:<sup>2</sup>
  - Cattle (beef and leather)
  - Millet
  - Rice, paddy
  - Nuts
  - Vegetables
  - Cassava
  - Oil palm

<sup>a</sup> The overall country governance risk scores reflect Forest Trends' 2021 updated assessment of national-level independent political, governance, business, economic, and corruption indices, which draw on a broad range of relevant underlying data from the World Bank, African Development Bank, Asian Development Bank, Inter-American Development Bank, International Fund for Agricultural Development's programming criteria, United Nations and governmental aggregated data, as well as independent surveys and other primary data to provide an average relative governance and corruption risk score for 211 countries globally. Countries scoring less than 25 are considered "Lower Risk," countries scoring between 25 and 50 are "Medium Risk" and countries scoring above 50 are "Higher Risk." The risk scores can only give an indication of the likely level of illegal deforestation in a country and ultimately speaks to the risk that corruption and poor governance undermines rule of law in the land sector. A full methodology is available on the IDAT Risk website: <https://www.forest-trends.org/fptf-ilat-home/>.

<sup>b</sup> Illegal deforestation is defined in this dashboard as conversion of forest that takes place in contravention of each country's legislative framework (laws, regulations, instructions, and any other legal instrument that penalizes non-compliance) at the time the deforestation took place. For purposes of this dashboard, conversions that were "legalized" after the fact (through amnesties, legal amendments, for example), after prosecution, or by paying a fine, are not considered to have been conducted in compliance with the rule of law. This dashboard does not include breaches of international law or customary law unless they are included in national statutory or case laws. This definition encompasses two general categories: illegalities in licensing and illegalities in forest clearance.

**NIGERIA'S FRC PRODUCT-LINKED DEFORESTATION AS A PROPORTION OF TOTAL LAND-USE SECTOR-LINKED DEFORESTATION (%)<sup>3</sup>**

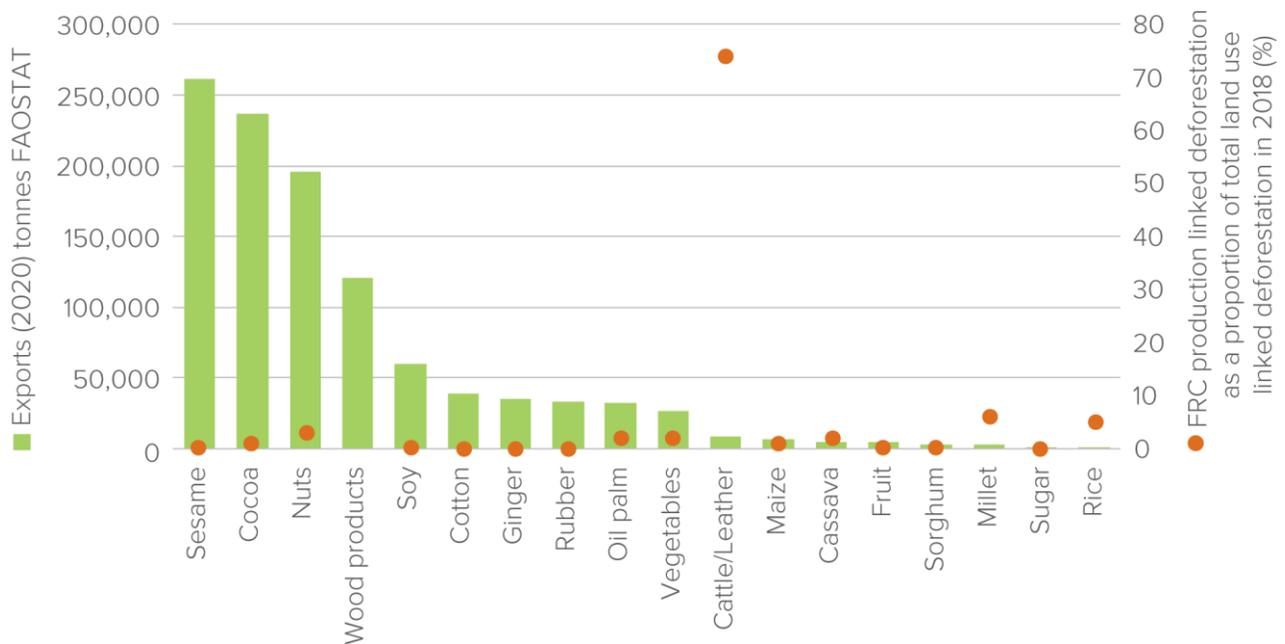


■ FRC-Related Moratorium on Forest Conversion in Effect: NO

■ Main forest risk commodities (FRCs) exported to international markets:

- Sesame
- Cocoa
- Nuts
- Wood products
- Soy

**NIGERIA'S 2020 FRC EXPORTS AND PROPORTION OF LAND USE-LINKED DEFORESTATION IN 2018 (%)<sup>4</sup>**



- **Related Export Restriction in Effect:** YES<sup>c,5,6,7</sup>
  - **Beef** - Raw hides and skin (including Wet Blue and all unfinished leather)<sup>8</sup>
  - **Maize** – maize and all products or derivatives<sup>9,10</sup>
  - **Rubber** – unprocessed rubber latex and rubber lumps<sup>11</sup>
  - **Rice** – rice and all products and derivatives<sup>12</sup>

## LAND-USE SECTOR

- **Forested Area:**
  - 21.6 Mha in 2020<sup>13</sup>
  - 4.3 Mha of forest cover in 2020<sup>14,d</sup>
  - 1.6 Mha of primary forest in 2020<sup>15</sup>
- **Global ranking for forest loss:**<sup>e</sup>
  - 58th globally in forest loss in 2020<sup>16</sup>
  - 40th in forest loss in the tropics in 2020<sup>17</sup>
- **Total Gross Emissions from deforestation:**<sup>f</sup>
  - 8 Mt CO<sub>2</sub>e in 2020<sup>18</sup>
- **Deforestation rate & area:**
  - 0.73% annually or 163,310 ha/yr<sup>19</sup>
  - 40,594 ha of forest cover (>50% tree cover) in 2020<sup>20</sup>
  - 13,217 ha of primary forest in 2020<sup>21</sup>
- **Rate of expansion of land for relevant commodities in harvest area 2010-2020:**<sup>22,g</sup>
  - Sesame: 92% increase
  - Soy: 130% increase
  - Cocoa: 0.9% decrease
  - Cashews: 63% decrease
  - Wood crops unknown
- **Forest Ownership:**<sup>23</sup>
  - 15.5 Mha unknown, 6.6 Mha public ownership, 0.4 Mha private ownership
- **Domestic Production by FRC in 2020:**<sup>24</sup>
  - Cocoa: 340,163 tonnes

<sup>c</sup> Nigeria's Export (Prohibition) Act, published in 1989 and updated in 1999, prohibits the exportation of the goods specified in the Schedule to this act, notwithstanding commodities mentioned in the Customs Excise Tariff, etc., (Consolidation) Act, or any other Act or enactment. The Act includes beans, cassava tuber, maize, rice, yam tuber, and all products and derivatives from these goods. The Federal Ministry of Finance also publishes an export prohibition list on the customs website that includes maize, timber (rough or sawn), raw hides and skin, unprocessed rubber latex and rubber lumps, among other items.

<sup>d</sup> Forest cover is defined as forest areas with greater than 50 percent tree cover that is greater than five meters tall.

<sup>e</sup> Forest loss is defined as the complete removal of forest cover.

<sup>f</sup> This dashboard quantifies the amount of greenhouse gas emissions (expressed in mega-tonnes (Mt) of carbon dioxide equivalent emissions) from deforestation and other disturbances (forest fire and drainage of organic soils), as reported by Global Forest Watch (using methodology from Harris et al. 2021).

<sup>g</sup> Data is sourced from FAOSTAT. Limitations exist around production and expansion data. For example, FAO states that "data on yields of permanent crops are not as reliable as those for temporary crops, either because most of the area information may correspond to planted area, as for grapes, or because of the scarcity and unreliability of the area figures reported by the countries, as for example for cocoa and coffee." For additional information on FAO's methodology, see [https://fenixservices.fao.org/faostat/static/documents/QCL/QCL\\_methodology\\_e.pdf](https://fenixservices.fao.org/faostat/static/documents/QCL/QCL_methodology_e.pdf).

- Sesame: 490,000 tonnes
- Soy: 600,000 tonnes
- Cashews: 98,809 tonnes
- Cattle (Beef): 326,398 tonnes
- Cattle (hides/leather): 39,301 tonnes
- Wood products: 4,826,741 tonnes

## RISKS ASSOCIATED WITH ILLEGAL FOREST CONVERSION

Nigeria’s production of forest-risk commodities is likely to increase in the future – the population is projected to grow from 206 million in 2020 to 400 million by 2050. More than half will live in urban areas with higher temperatures and more extreme weather events due to climate change. Agriculture in Nigeria constitutes 21 percent of its GDP, 36 percent of its employment, and is dominated by smallholders who own 0.5 hectares (ha) of land on average, many of whom live in poverty.<sup>25,26</sup> Under these economic and demographic pressures, the forest reserves are at high risk of further encroachment by farmers, herders, loggers, and poachers. Political instability and continued use of forests by armed groups could also drive further deforestation. Forest law enforcement lacks capacity and resources, and there remains a lack of effective coordination between control of the wildlife trade, illegal logging, and sustainable forest management.

- Nigeria’s forest area has decreased by 9% since 2000, including a 12% decrease in forest cover in protected areas, despite legal protections, highlighting the challenge of preventing illegal deforestation.

Nigeria’s remaining forest area is estimated at 4.3 Mha as of 2020. Forest area has been decreasing, with a 9 percent reduction in forest cover reported from 2000-2020. Nigeria’s forest loss peaked in 2017 with an annual loss of more than 55,000 ha. In 2020, 40,594 ha of forest was lost, of which one-third was primary forest.<sup>27</sup>

The land-use sector, including agriculture and forestry, accounts for 60% of Nigeria’s total greenhouse gas (GHG) emissions.<sup>28</sup> Deforestation from 2000-2020 reportedly generated 217 Mt of CO<sub>2</sub>e emissions, 24 Mt of which were emitted in 2020.<sup>29</sup> Annual emissions from forest loss have been estimated from 2006-2016 as part of Nigeria’s National Forest Reference Emission Level, which reported 32.4 Mt CO<sub>2</sub>e annually.<sup>30</sup>

Most of Nigeria’s dense forests are located in the Niger River Delta and the eight states of Bayelsa, Cross River, Edo, Ekiti, Ondo, Osun, Rivers, and Taraba.<sup>31</sup> Edo state has been associated with the highest rates of forest loss in the last few years. Global Forest Watch estimated that 27 percent of Nigeria’s total deforestation took place in Edo state in 2020, with Cross River, Taraba, and Ondo states accounting for another 40 percent combined. Nigeria’s remaining forest is concentrated in the southwest of the country and along the border with Cameroon.<sup>32</sup>

### DEFORESTATION BY STATE IN NIGERIA, 2020 (%)<sup>33</sup>

STATE	PERCENTAGE OF TOTAL NIGERIAN DEFORESTATION
Edo	27%
Cross River	18%
Taraba	11%

Ondo	11%
Other states	33%

Forest cover in Nigeria falls into three categories: forest reserves, free areas, and plantations, the latter either on private land or in state-owned forest reserves. Forest reserves were created before independence, when 10 percent of Nigeria’s land area or nearly 10 Mha was set aside for forest management. Free areas are outside forest reserve boundaries and not directly managed by the state forestry department, although permits are required to fell trees. Plantations within forest reserves are owned by the state, while plantations outside are owned by private individuals or companies.<sup>34</sup> There are no official records of indigenous territories in Nigeria and indigenous peoples have no greater rights than local communities.<sup>35,36</sup>

Commodities grown in forest reserves are at risk of illegality because laws are ignored and not enforced.<sup>37</sup> In Taraba state, officials admitted that most of the reserves “only exist on papers” (sic) and nearly all have been encroached upon.<sup>38</sup> The federal government states that, “uncontrolled encroachment and clearing of forestland will continue to occur until management plans are put in place,” and “the situation now is that most of the forest reserves are being subjected to de-reservation as a result of increase in population and economic expansion in other sectors of the economy” (sic).<sup>39</sup>

Nigeria has about 12 Mha of protected areas where about one-third of the remaining natural forest is located, including seven national parks and 994 forest reserves.<sup>40</sup> However, reports suggest that “the Nigerian government does not have enough funding or manpower to effectively manage the areas deemed *protected*.” As such, protected areas are threatened by agricultural expansion, livestock grazing, poaching, and illegal logging.<sup>41</sup> Global Forest Watch (using Hansen et al. 2013) estimates that around 12 percent of the forest in protected areas had been destroyed between 2000 and 2020.<sup>42</sup>

Despite regulatory schemes to prevent forestland conversion, by 2012, 96 percent of Nigeria’s original forest cover had been cleared or degraded in some way due to unsustainable resource extraction, including agro-conversion.<sup>43</sup> One of the most high-profile locations for illegal agro-conversion is Cross River National Park, home to the remaining Cross River gorilla population, where agriculture and conversion to pasture are driving forest loss. In Gashaka Gumti National Park in Taraba, nine rangers were killed by illegal loggers and poachers in 2019, and cattle farmers have since moved in.<sup>44</sup> Illegal forest conversion for agriculture is also linked to the illegal trade of protected timber and animal species. Illegal logging for high-value species such as rosewood (*Pterocarpus erinaceus*) is prevalent, despite its designation by the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), driven by high demand in China and Southeast Asia.<sup>45,46,47</sup>

- **Agricultural conversion is the main driver of forest loss in Nigeria due to production of beef, millet, rice, cassava, and vegetables, which are mostly sold/consumed domestically.**

Global Forest Watch (using Curtis et al. 2019) estimates that shifting agriculture is responsible for around 93 percent of Nigeria’s 2020 forest loss. An additional 2 percent of the forest loss was reportedly a result of commodity production/extraction, primarily through commercial agriculture.<sup>48</sup> Agricultural expansion is therefore the main threat to forests. Nigeria’s Forest Policy of 2006 states that “as cultivated lands are depleted, farmers look to forested lands for fertile soils,” preferring “to encroach on forest reserves where soils are relatively more fertile,” thus driving deforestation.<sup>49</sup>

The majority of Nigeria's agricultural production is for the domestic market and is grown by smallholder farmers (particularly rice, cassava, millet, vegetables, and beef). To date, Nigeria's agriculture sector has been able to meet roughly 90 percent of its domestic demand, but that demand is expected to increase; Nigeria's population is projected to increase from 206 million in 2020<sup>50</sup> to 400 million by 2050.<sup>51</sup> The main agricultural commodities tied to deforestation and produced for the domestic market include:

**Cattle (beef and leather)** represent the biggest deforestation footprint of all agricultural commodities produced in Nigeria. Between 2005 and 2018, cattle (beef and leather) production was tied to over 500,000 ha of deforestation.<sup>52</sup> Nigeria reportedly contains 18.4 million individual animals, mostly indigenous breeds managed by semi-sedentary and transhumant pastoralists.<sup>53</sup> Eighty-two percent of cattle farming is pastoral, with herds of 100-300 moved in search of pastures and water, and producing subsistence beef, milk, blood, hides, manure, and horns. Only 1 percent of cattle farming in Nigeria is commercial, and 17 percent is described as agro-pastoral for subsistence or commercial dairy production, mostly in the southern regions.<sup>54</sup>

Despite a large national herd, demand for beef exceeds supply. In 2017, Nigeria imported 25 percent of its beef.<sup>55</sup> Most beef is consumed domestically, though some herds are moved across Nigeria's northern borders and sold commercially in Niger.<sup>56,57</sup> The livestock sector has been growing at a rate of 12.7 percent, nearly double the rate of growth in the agricultural sector.<sup>58</sup> As the population increases, demand for beef is projected to rise 196 percent by 2050. Changing rainfall patterns resulting from climate change are also expected to make livestock production more challenging.<sup>59</sup> Increased pressure on land is expected to further increase the risk of illegal conversion of forests to pasture.

The pastoral groups of the north who move with the seasonal grazing patterns of their animals often graze their cattle in forests, but have become the target of criminal cattle rustlers and armed bandits on their migration south to the rainforests during the dry season.<sup>60</sup> Nigeria's cattle rustling business is highly weaponized and commercialized and reportedly has links to terrorists and foreign criminal networks.<sup>61</sup> The Sambisi forest in Borno state was the base of Boko Haram militants, and cattle rustling was both a source of revenue and of food for the militants and hostages kept deep within the forest.<sup>62,63</sup> Onwuzuruigbo argues that ungoverned forest spaces have become enclaves of criminal gangs primarily because they lack government presence, and cattle banditry cannot be addressed without also addressing forest governance.<sup>64</sup>

The National Livestock Transformation Plan, approved in 2019, prioritizes investment in the dairy sector and proposes ranches to reduce land conflict between pastoralists and farmers. It has been slow to start, even in the seven proposed pilot states of Adamawa, Benue, Kaduna, Nasarawa, Plateau, Taraba, and Zamfara.<sup>65</sup> Challenges include, the lack of land for new ranches, lack of federal funding, a history of conflict over grazing reserves, and resistance from both farmers and herders.<sup>66,67</sup> If implemented, forest reserves could be at further risk of conversion.

Nigeria is one of Africa's largest producers of **rice**, and is the world's leading producer of **cassava**.<sup>68</sup> Rice and cassava harvested area has increased over 100 percent from 2010 – 2019.<sup>69</sup> These products have a high deforestation footprint, with rice linked to the deforestation of nearly 29,000 ha and cassava nearly 40,000 ha between 2005 and 2018.<sup>70</sup> Several export restrictions reportedly exist for many staple crops, including maize, rice, and beans, to protect food security in the country.

- **Export-oriented cash crops, particularly wood products, cocoa, cashews, and sesame, are also associated with an elevated risk of illegal conversion.**

While the production of export-oriented cash crops are not the primary drivers of deforestation in Nigeria, there risks remain that several exported agricultural commodities have been produced on illegally converted forest land.

Nigeria is the fourth largest producer of cocoa in the world, after Côte d'Ivoire, Indonesia, and Ghana. It has a production volume of 245,000t of cocoa beans per annum, covering a 6.5 percent share of global production. Cocoa production was tied to nearly 5,000 ha of forest loss between 2005 and 2018.<sup>71</sup> The area under cocoa production decreased by just shy of 1 percent between 2010 and 2020, which has been accompanied by a 15 percent reduction in the volume of cocoa beans produced.<sup>72</sup> In total, there are about 300,000 cocoa farmers in Nigeria, most of whom are smallholders growing cocoa on five ha or less. Many have trees that are more than 25 years old and associated with declining production.<sup>73</sup> Recent declines in production suggest that farmers will need to increase their area of harvest even further to keep production at a constant rate. There is a high risk associated with additional illegal conversion of forestland or encroachment into protected areas for cocoa produced in Nigeria.

Most cocoa plantations have been established on former primary forestland.<sup>74</sup> Cocoa is predominantly cultivated in the southwest, with Ondo state leading production in 2020, followed by Cross River state.<sup>75</sup> A study of three forest reserves in Ondo state found that, though agroforestry was promoted as an ecologically friendly form of farming, the tree density in cocoa agroforestry was only 8.4 percent, compared to the nearby forest with a high proportion of fruit trees and fewer species than the natural forest.<sup>76</sup> In Ogun state, the Omo Forest Reserve lost 7 percent of its tree cover between 2001 and 2018, which was reportedly a direct result of illegal conversion of forestland for cocoa farming.<sup>77</sup> There are reportedly 300 farming communities illegally living in and around the Omo Forest Reserve.<sup>78</sup>

Most cocoa is exported as beans and the Netherlands is the main export market. The United States (US), European Union (EU), and other countries have a Generalized System of Preference under which all beans are exempt from import tax, while cocoa products carry a tariff (e.g., cocoa powder carries a tariff of 2.8% and cocoa butter 4.2% in the EU).<sup>79,80</sup> Nigeria has no Economic Partnership Agreement with the EU, unlike Côte d'Ivoire and Ghana, and pays the full 6.1 percent on processed products such as cocoa paste. Possibly as a result, Nigeria's cocoa processing plants are underutilized,<sup>81</sup> with cocoa beans as the dominant export in Nigeria. Still, cocoa liquor and cocoa butter are also being exported, indicating growth in cocoa processing. Currently, about 30 percent of cocoa beans produced in Nigeria are processed locally. Ninety percent of processed cocoa products are exported, while the remainder is used locally by beverage manufacturers.

Cocoa production is projected to grow by 4 percent per annum in coming years.<sup>82</sup> Cocoa is one of the 13 National Strategic Export Products of the federal government and is prominent in the Nigerian Export Promotion Council's zero-oil plan initiative. Cocoa accounted for 20.8 percent of all non-oil exports in Nigeria in 2018, and Nigeria earned \$338.17 million from cocoa and cocoa products in 2018.<sup>83</sup>

Nigeria's cocoa plantations are also vulnerable to future variations in climate. Modeling of climate change in West Africa identifies that high dry season temperatures will be the biggest threat in the 2050s, and the area most at risk is the forest-savanna transition zone in Nigeria and eastern Côte d'Ivoire.<sup>84</sup>

Nigeria produced 350,000 tons of cocoa in 2019,<sup>85</sup> of which 116,958 tons were certified under the Rainforest Alliance and UTZ programs. However, in Nigeria, only 60,000 tons of certified cocoa produced was sold with a premium due to oversupply.<sup>86,87,88</sup>

**Sesame** seed production was tied to over 4,000 ha of forest loss between 2005 and 2018.<sup>89</sup> Smallholder farmers are responsible for about 90 percent of the production, while some commercial farming is developing.<sup>90</sup> Sesame seeds are grown mostly in Nigeria's northern and central states, with Benue and Nassarawa as the largest producers. Nigeria is now the 7<sup>th</sup> largest producer of sesame seeds worldwide.

Nigerian sesame seed production has increased significantly over the past decade, rising nearly fivefold from an average 116,000 tons/year from 2002-2011 to an average 579,000 tons from 2012-2019, with 2020 production at 490,000 tons. Nigeria has been part of a wave of sesame seed production growth across Africa over the past two decades, rising from just 24.2 percent of global production in 2002 to 61 percent in 2019.

More than half the national production was exported in 2019, with sesame exports valued at \$353 million. The top five destinations were Turkey, Japan, Singapore, the EU 27+ EFTA, and India. The area harvested increased by 92 percent between 2010 and 2020,<sup>91</sup> and reports indicate a high risk of future illegal forestland conversion for sesame production. However, there is limited information on current rates and examples of illegal conversion specific to sesame production.

Over 90 percent of Nigeria's **nut** (groundnut and tree nut) exports are **cashews**, and Nigeria exports about 200,000 metric tons of cashews annually, mainly to Vietnam and India.<sup>92</sup> Cashew production was tied to over 10,000 ha of forest loss between 2005 and 2018. Cashews are grown throughout Nigeria, both in the arid north and rainforest region of the south. Cultivation is primarily in the south and middle belt regions in smallholder farms and plantations. Roughly 30 percent of cashews are grown in Kogi State. Cashew production increased throughout the 1990s and reached a peak of 800,000 tons harvested in 2009, then decreased to less than 100,000 tons in 2020.

Cashews were planted in the East of Nigeria in the 1950s for afforestation and to prevent soil erosion, but are now associated with deforestation risk. One leading agribusiness in Nigeria advises farmers to clear forest before planting seedlings, saying, "in the tropical rain forest zone, total clearing of the land and felling of forest trees towards the end of dry season is compulsory." Estimates suggest that cashew plantations covered nearly 400,00 ha in 2010, dropping to less than 200,000 ha in 2020. The Government of Nigeria is developing a Ten-Year Strategic Plan for cashews, in partnership with the United States Department of Agriculture (USDA), and aims to increase production capacity to 350,000 tons by 2023, and processing capacity from 15 percent in 2020 to 35 percent by 2023.<sup>93</sup>

The major products from cashews are dried cashew nuts, cashew kernels (nuts), which are ready to eat products, cashew nutshell liquid (CNSL), cashew juice, cashew apple candy or jam, and cashew apple wine. Around 90 percent of cashew product exports are in the form of raw nuts, mostly to Vietnam and India for processing.<sup>94</sup> Improved processing capacity would increase export value, reduce emissions related to shipping, and provide nutshells for local communities to use as an energy source, reducing pressure on forests for firewood.<sup>95</sup>

**Soy** was linked to over 5,000 ha of deforestation between 2005 and 2018, as well as 465,972 tCO<sub>2</sub>e in emissions.<sup>96</sup> Before 2017, soy's deforestation footprint in Nigeria was negligible. The area harvested increased by nearly one half between 2015 and 2017, and production peaked at nearly one million tons, though both subsequently declined to 2012 levels by 2020. Soy is produced in the North Central (47 percent) and Northwest zones (41 percent) where food insecurity is a serious challenge to production. Nigeria is the second largest producer of soybeans in Africa, accountable for 17 percent of the continent's soy production in 2020. Exports were worth \$67 million in 2020, and top importers were France (70 percent) and the Netherlands (16 percent).

In addition, the wood pulp industry is also exporting to international markets, and there remains an elevated risk that plantations may be developed on illegally cleared land. There are an estimated 269,000 ha of forest plantations in Nigeria, of which 109,377 ha are reportedly Gmelina for the pulp and paper industry, and 159,623 ha are other species for industrial wood production.<sup>97</sup> The government acknowledged the risk of deforestation associated with these products, saying “All these plantations have been planted in forest reserves, often at the expense of natural vegetation.”<sup>98</sup> Forests are managed for economic profitability, and the government’s stated aim was “aggressive establishment of plantations” in order to increase the area under sustainable forest management to 25 percent of Nigeria’s land area.<sup>99</sup>

Tree cover in forest reserves has been significantly reduced due to lack of management plans and weak law enforcement.<sup>100</sup> By 2015, the government reported that the extent of forest in forest reserves was down to 6.6 Mha.<sup>101</sup> Forest reserves are managed for timber or fuelwood, but without management plans or enforcement, there has been rapid encroachment by loggers and farmers.

FOREST CLEARED IN NIGERIA (HECTARES), BY COMMODITY, 2005-2018	
Cattle (beef and leather)	500,000 ha
Rice	29,000 ha
Cassava	40,000 ha
Cocoa	5,000 ha
Sesame	4,000 ha
Nuts	10,000 ha
Soy	5,000 ha
Wood Pulp	

- Policies governing forest conversion and agricultural production are set by Nigeria’s 36 states and are not always publicly available, making it challenging to determine the applicable laws country wide.

Nigeria is a federation with 36 states and a Federal Capital Territory (FCT). This means that the role of the federal government is to coordinate and monitor the forestry sector and establish and manage National Parks, while the state governments are empowered to create and manage forest reserves and enforce forest law.<sup>102,103</sup> The Forest Policy sets the national framework for forest management, but state forestry departments are independent bodies and are not mandated to comply. The new National Forestry Act is still in draft, and while each state also has its own forest law, many have not been updated in several decades. The National Strategy to Combat Wildlife and Forest Crime in Nigeria 2022-2026, launched in April 2022, does not mention illegal conversion of forest for agriculture, but focuses instead on high-value timber from natural forests, charcoal production, ivory, and pangolin scales.

According to the National Forest Policy of 2006, a management plan should be developed for every forest reserve and reviewed every five years, but no state has an up-to-date management plan. In Oyo state, the management plan dates back to 1914.<sup>104</sup> In Cross River state, a forest strategy is being developed, setting out conservation and sustainable management objectives and the role of the Cross River Forestry Commission and key stakeholders.<sup>105</sup> In general, state forest policies and laws are not easily or consistently available for farmers to access, and therefore the relevant laws “are not upheld consistently by all entities and/or are often ignored, and/or are not enforced by relevant authorities.”<sup>106</sup>

Conversion rights are also determined by state forest law. In Taraba state, uprooting, felling, or damaging a protected tree of over 30 centimeters (cm) in girth in a reserve forest without written authorization carries a penalty of a fine or a three-year prison sentence.<sup>107</sup> In Cross River State, clear-cutting for agriculture is prohibited unless written permission is granted by the Forestry Commission.<sup>108</sup> All states follow similar forest law.<sup>109</sup> Despite these restrictions, the national Forest Policy (2016) recognizes that “Forestland is widely used by local communities for cultivating crops, grazing and for fuelwood gathering, as well as building materials sourcing.” However, where conversion is done without authorization, it is illegal.<sup>110</sup>

Outside of the government forest reserves, there are free areas where forestland is privately owned, either through inheritance or rights of occupancy. Land is held in trust by the state government. Individuals are granted the right to occupancy under the Land Use Act, but the process of obtaining a Certificate of Occupancy is reportedly challenging.<sup>111</sup> There is a risk that conversion of forest land to crops is done by individuals who do not hold a certificate, and that the land becomes subject to competing claims and tenure conflict. Communal lands are held in trust for the people by the head of the community, and the same risks apply.<sup>112</sup> Official data on land ownership is lacking: only 0.35 Mha are reported in private ownership, while 15.5 Mha are categorized as unknown or other.<sup>113</sup>

Tree tenure is recognized to be uncertain and the subject of “considerable sensitivity amongst many people in Nigeria.”<sup>114</sup> Felling trees for timber requires a harvest permit and payment of fees, and there is a risk of logging without a permit or in contravention of requirements (e.g., overharvesting and under-declaring what has been felled). Other risks relate to the requirement to pay fees and taxes (each state has different tariffs for different species).<sup>115</sup>

#### ■ **Illegal conversion of forest for agriculture is not seen as a priority for law enforcement.**

Law enforcement reportedly lacks effective resourcing and capacity to enforce forest laws. As such, enforcement of illegal deforestation has been targeted at 1) the illegal kosso (*Pterocarpus erinaceus*) trade, sometimes referred to as “rosewood” in the Nigerian context<sup>h</sup> and 2) addressing the significant concerns raised by the CITES Secretariat concerning the volume of kosso exported between 2015 and 2017, which led to a ban of all kosso trade from Nigeria in 2018.<sup>116</sup> Despite these reports, there have been no prosecutions relating to the illegal timber trade in the last three years.<sup>117</sup> If any enforcement of forest law happens, it is first pursued through the state courts (High Courts or Magistrates Courts). The decisions of these state courts are not routinely documented, and analysis of cases is only possible for those that are taken to appeal in the federal courts system and are decided in the Court of Appeals and Supreme Court.<sup>118,119</sup>

An Environmental Impact Assessment (EIA) is required by law for any project that affects Nigeria’s environment, but “legal enforcement of EIA in Nigeria is challenging.”<sup>120</sup> Corruption is identified as a problem, as well as a shortage of competent personnel and the influence of business investors who double as political “godfathers.”<sup>121</sup> In multiple locations, forest guards are reported to be taking payments in exchange for allowing agriculture on forest reserves. Akure-Ofosu Forest Reserve in Ondo state lost 30 percent of its forest cover between 2001 and 2018, and a top government official told Mongabay that the government gave up enforcement against conversion and “decided to formalize and monetize reserve lands.”<sup>122</sup> Farmers are allowed to continue cultivating their plots in exchange for payments, and in 2019, farmers were allocated new plots as well as ID cards legitimizing their presence in the reserve. Farmers said they pay 10,000 naira, or \$26 per year in fees and are allowed to grow cocoa, rubber, plantain, and other crops on reserve land.<sup>123</sup> A similar situation was

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<sup>h</sup> *Pterocarpus erinaceus* is distinct from *Dalbergia* spp. and referred to as “kosso” in this dashboard.

reported in Oluwa Forest Reserve in Ondo, where a state policy was introduced in 2017 to allow previously established farms to continue, but new fields and farms were prohibited. The ban failed due to lack of enforcement.<sup>124</sup> In total, 32,881 farmers have been recorded in Ondo state's fourteen forest reserves, cultivating a total of 57,758 ha. The state revenue service has registered them and charges them the annual fee according to the extent of land they are cultivating, while maintaining that, "the farmers were there illegally ab initio."<sup>125</sup>

Cross River state's forest reserves are highly impacted by cocoa plantations, and customary practices recognize ownership of land based on clearance, which means that families are clearing more than they need, either to rent out to migrant farmers or for their children's future inheritance. Government compensation for evictions of farmers from forest reserves also acts as a perverse incentive to increase clearance.<sup>126</sup> A study of staffing at the Cross River Forestry Commission found that Cross River state's sixteen forest reserves (a total area of nearly six thousand km<sup>2</sup>) had only 10 percent of the recommended work force: 324 staff compared to the FAO recommended 3,458.<sup>127</sup> Poor enforcement of forest law means that agro-conversion in forest reserves is likely illegal. Even if farmers have permits and papers, there is a high chance of irregularities in the procedures for granting these documents.

■ **There are reports of violence tied to land grabbing and conversion and widespread reports of commodity theft across Nigeria.**

Conflict over land use often takes the form of violent clashes between Fulani militias and community militias and herders and farmers. In 2018, more deaths were related to violence involving Fulani militias than to Boko Haram (1,868 compared to 1,536). There is a general perception that President Buhari, who is Fulani, is biased towards the Fulani, and that there has been a lack of effective action against armed encroachment by herders.<sup>128</sup> Legislation introduced in some states has inflamed tensions, such as in Benue state, which had the highest rate of violent clashes in 2018 after legislation outlawed grazing outside of ranches and limited the movement of cattle to rail or road. Violence is spreading southwards, and customary management of land use is breaking down. Customary authorities are less able to negotiate herder movements with the growing number of farmers in a context of more state legislation.<sup>129,130</sup> After Ondo state introduced an anti-open grazing law, there were reports of attacks and farmer fatalities as herders moved their cattle into forest reserves where they clashed with farmers.<sup>131</sup>

Farmer-herder clashes are not the only type of land conflict, though they are the most violent. An analysis of land conflict in Ondo state found that boundary disputes were the most common, followed by resource control, inheritance, human/cultural conflicts, and natural use conflicts.<sup>132</sup>

## REPORTS & ADDITIONAL RESOURCES

A list of relevant reports and additional online tools to complement this country report is available at: <https://www.forest-trends.org/fptf-idat-home/>.

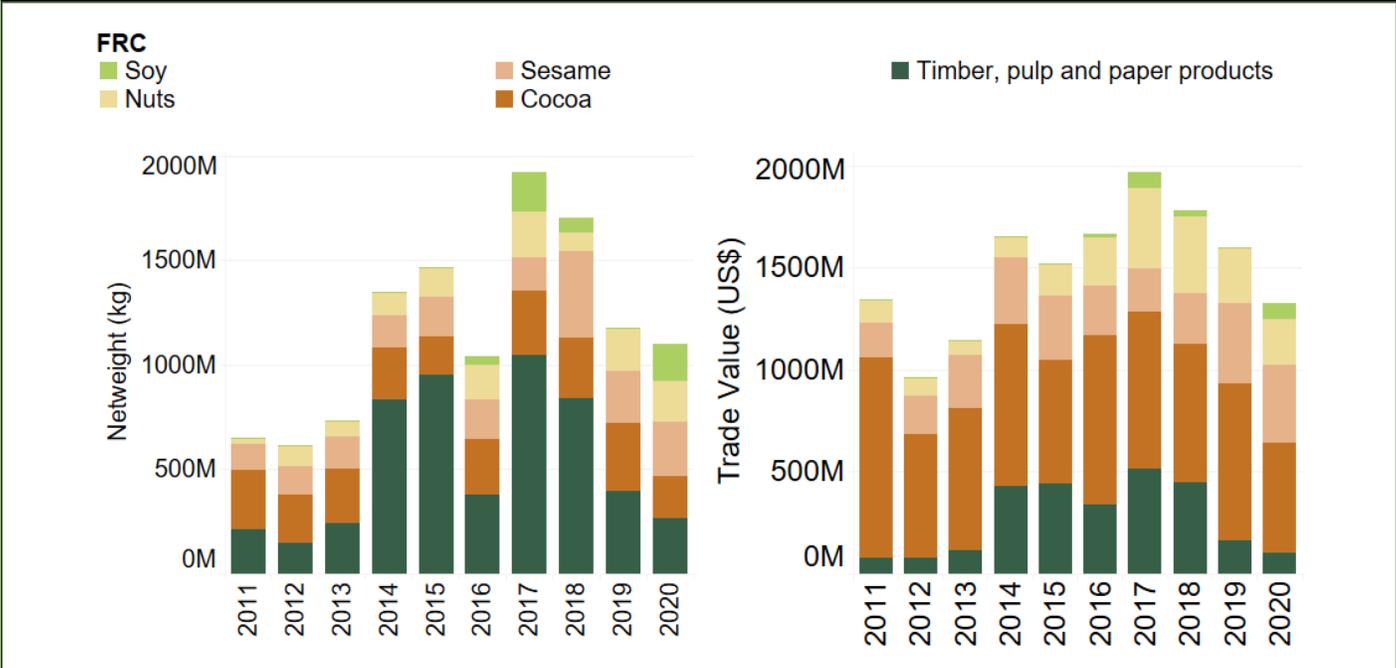
### Key Reading

- Preferred by Nature. 2021. "Timber Legality Risk Assessment – Nigeria." Preferred by Nature. <https://preferredbynature.org/sites/default/files/SourcingHubDownload/Nigeria/Nigeria%20TIMBER%20Legality%20Risk%20Assessment-EN-V1.0-Dec21..pdf>.
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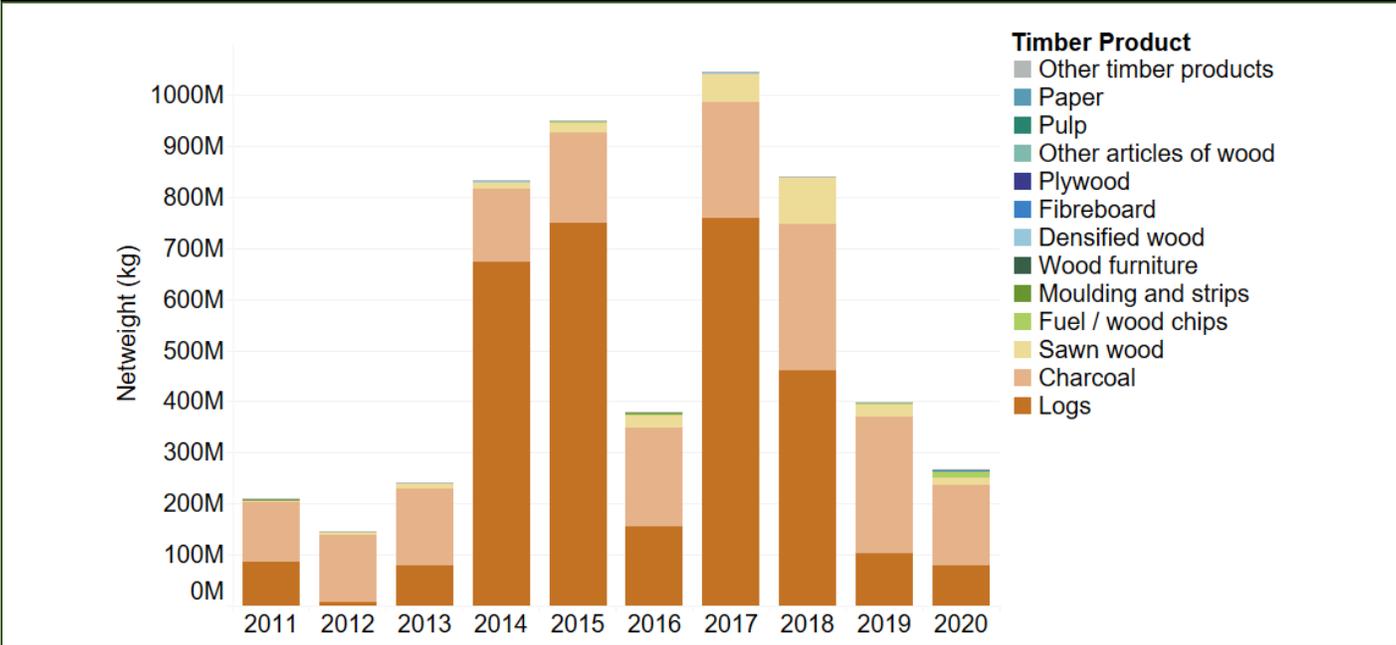
- Sunday, Orji. 2020. "Take over of Nigerian Reserve Highlights Uphill Battle to Save Forests"  
<https://news.mongabay.com/2020/05/takeover-of-nigerian-reserve-highlights-uphill-battle-to-save-forests/>.

**TRADE PROFILE**

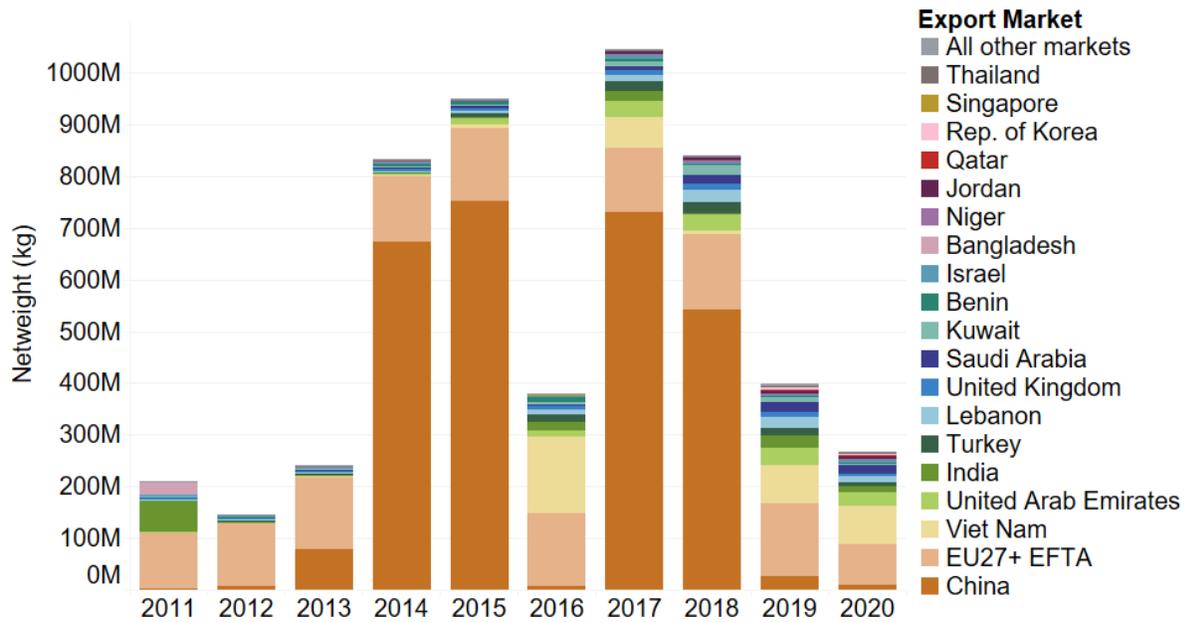
**GLOBAL IMPORTS OF TOP FIVE FRC PRODUCTS FROM NIGERIA<sup>133</sup>**



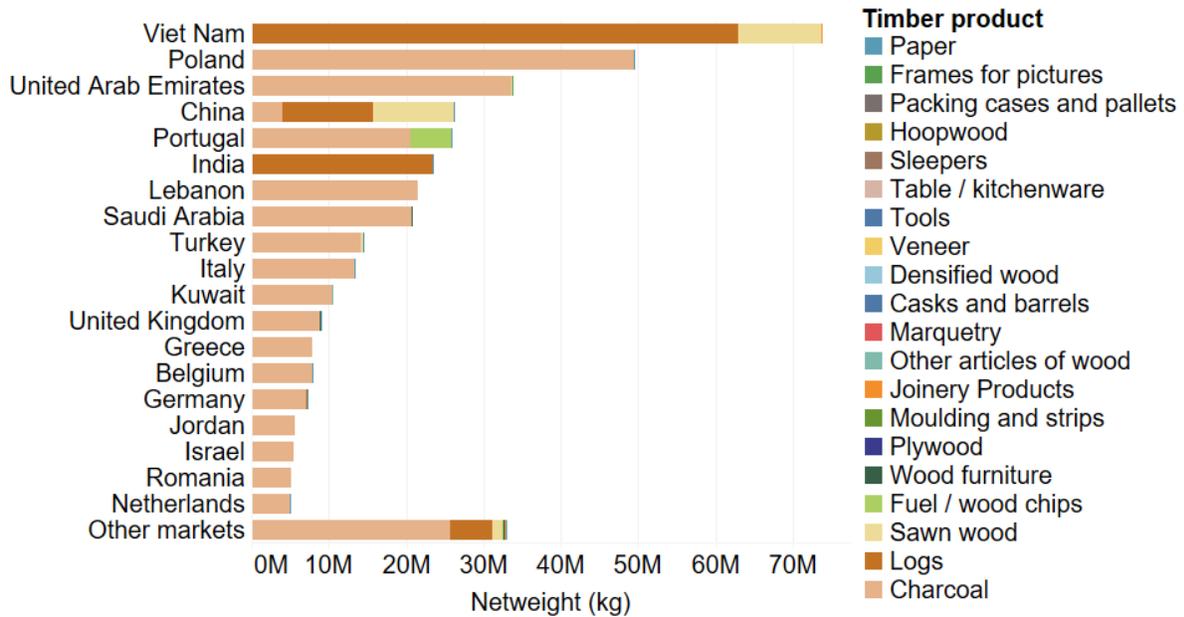
**GLOBAL TIMBER, PULP, AND PAPER PRODUCT IMPORTS FROM NIGERIA, 2011-2020<sup>134</sup>**



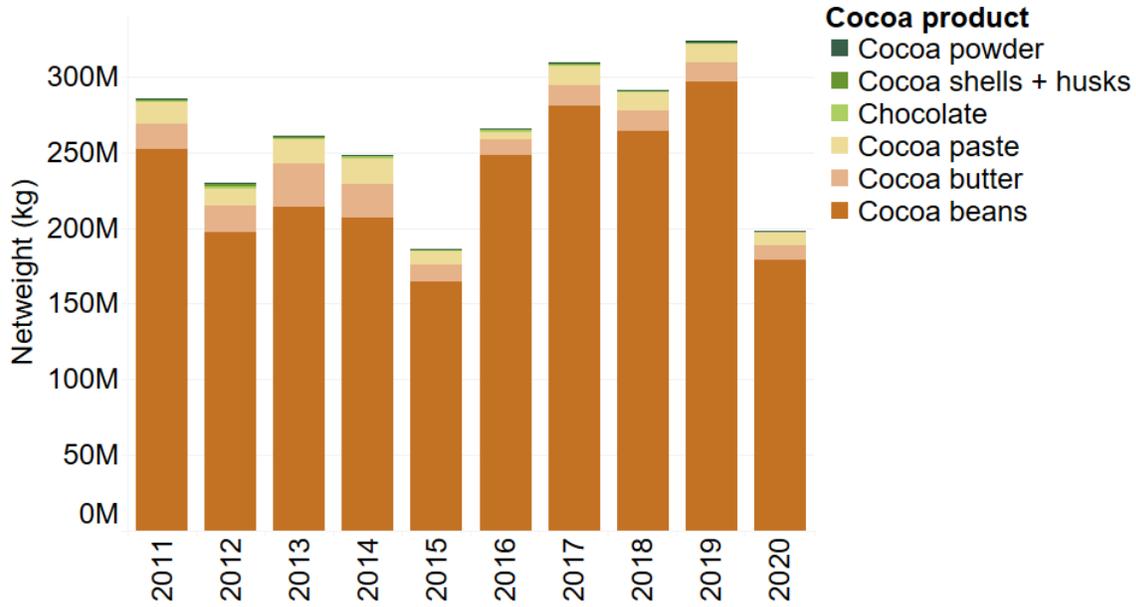
## GLOBAL TIMBER, PULP, AND PAPER PRODUCT IMPORTS FROM NIGERIA, BY MARKET <sup>135</sup>



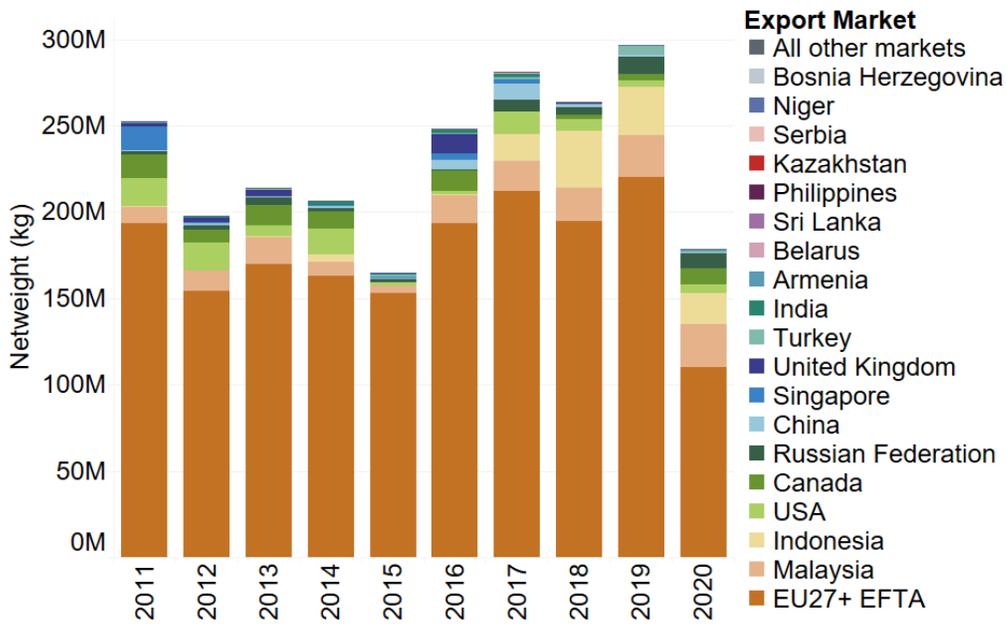
## GLOBAL TIMBER, PULP, AND PAPER PRODUCT IMPORTS FROM NIGERIA, 2019 <sup>136</sup>



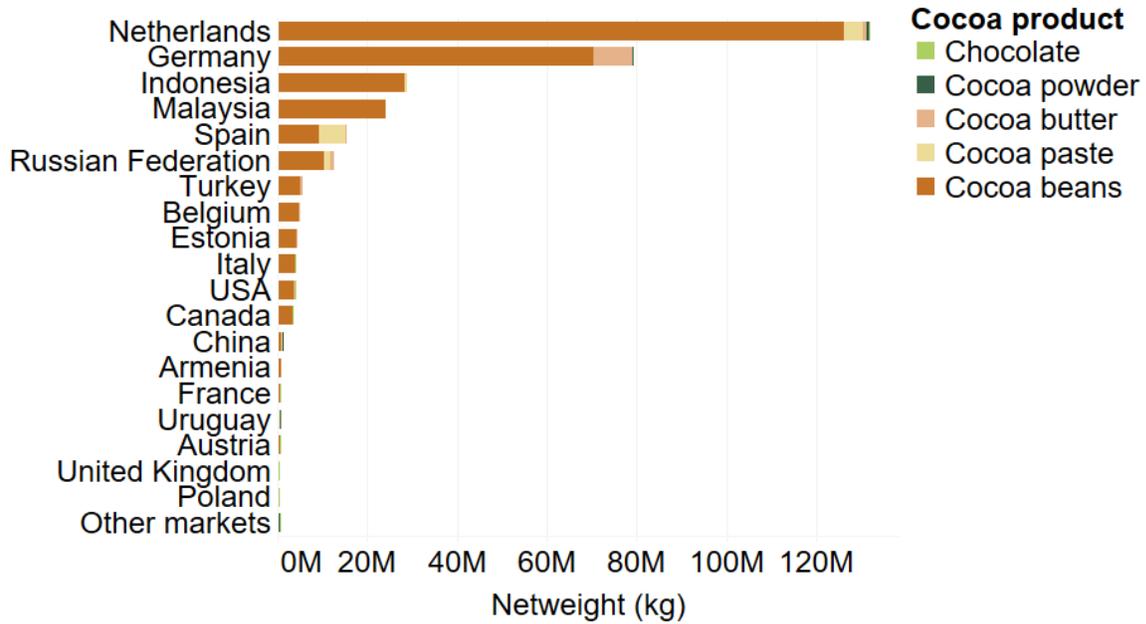
## GLOBAL COCOA PRODUCT IMPORTS FROM NIGERIA, 2011-2020<sup>137</sup>



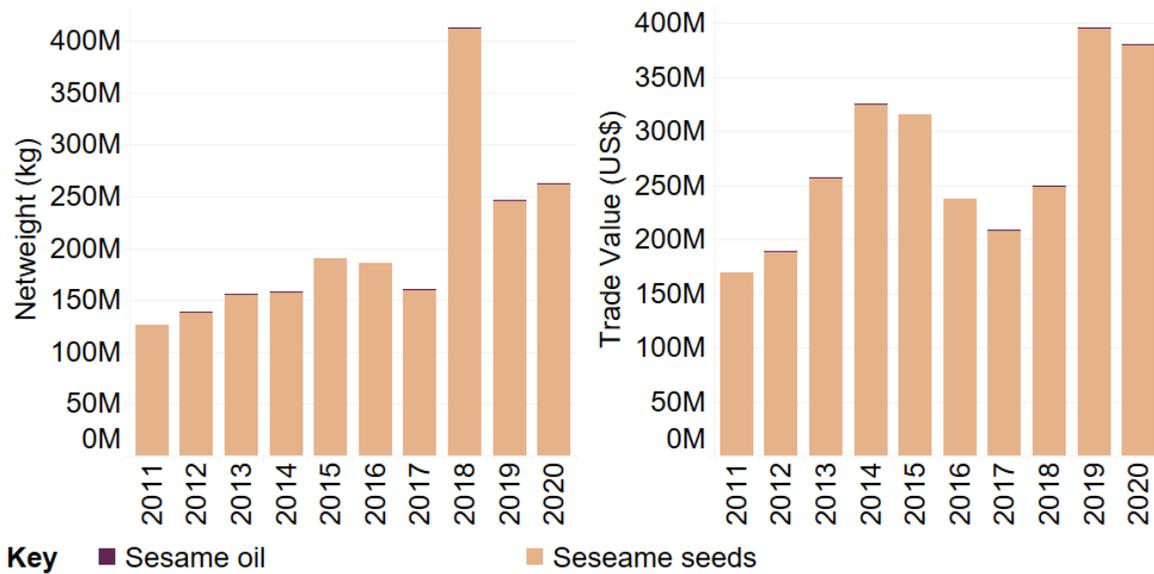
## GLOBAL IMPORTS OF COCOA BEANS BY IMPORTING MARKET, 2011-2020<sup>138</sup>



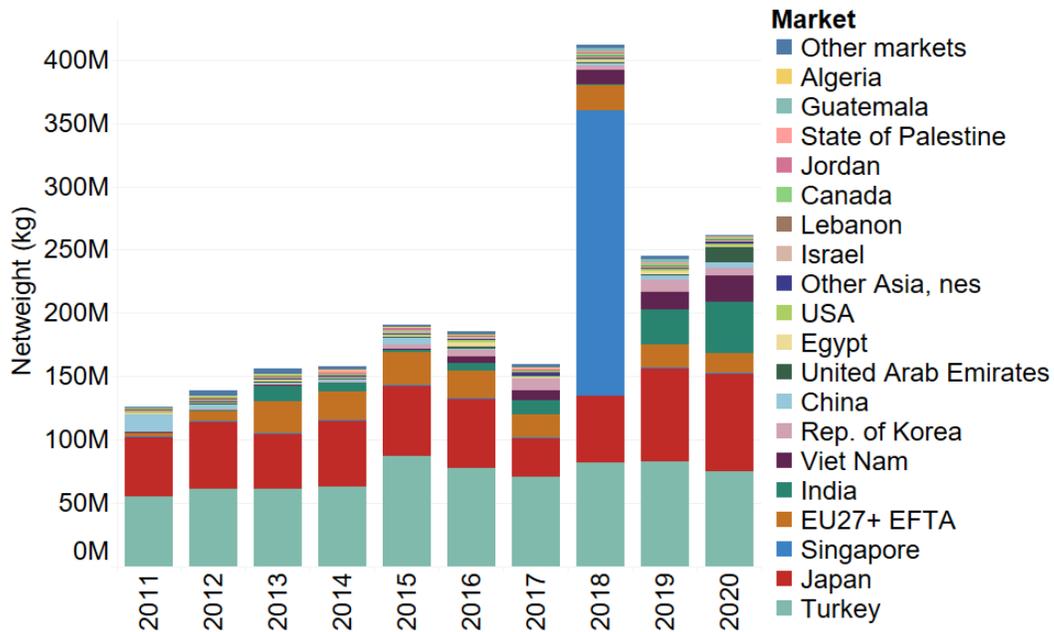
## GLOBAL IMPORTS OF COCOA PRODUCTS BY IMPORTING MARKET<sup>139</sup>



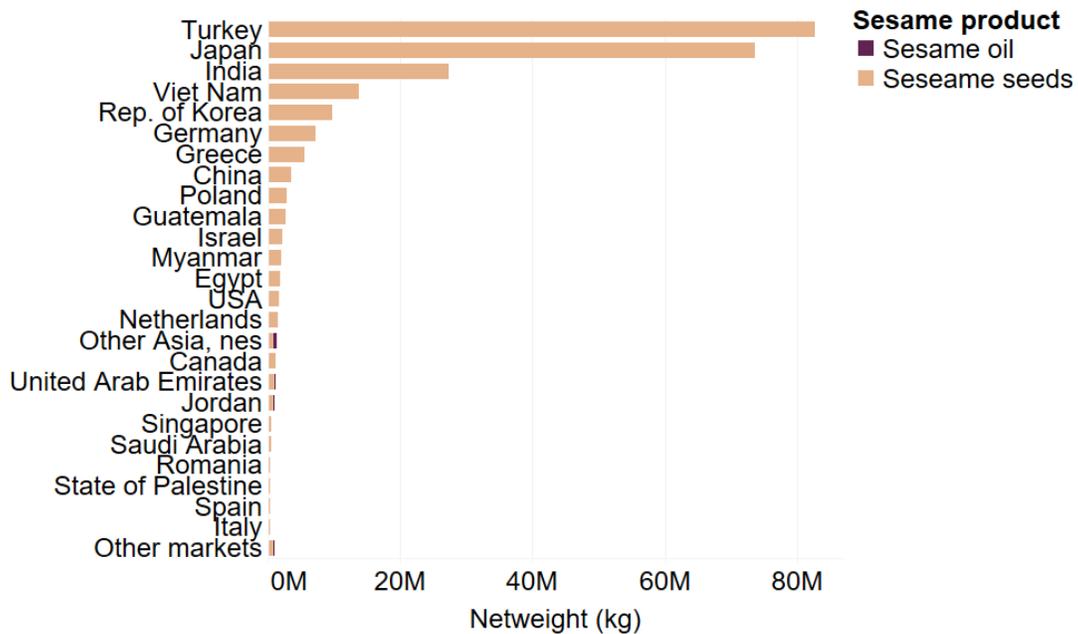
## GLOBAL SESAME PRODUCT IMPORTS FROM NIGERIA (KG; USD)<sup>140</sup>



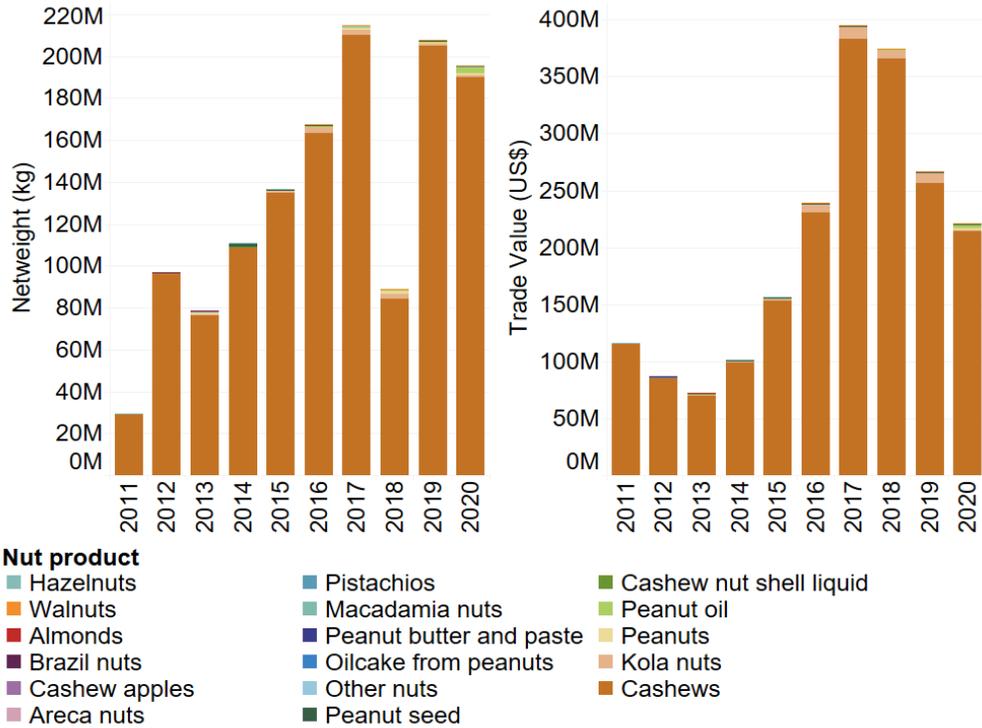
## GLOBAL SESAME PRODUCT IMPORTS BY MARKET, 2011-2020<sup>141</sup>



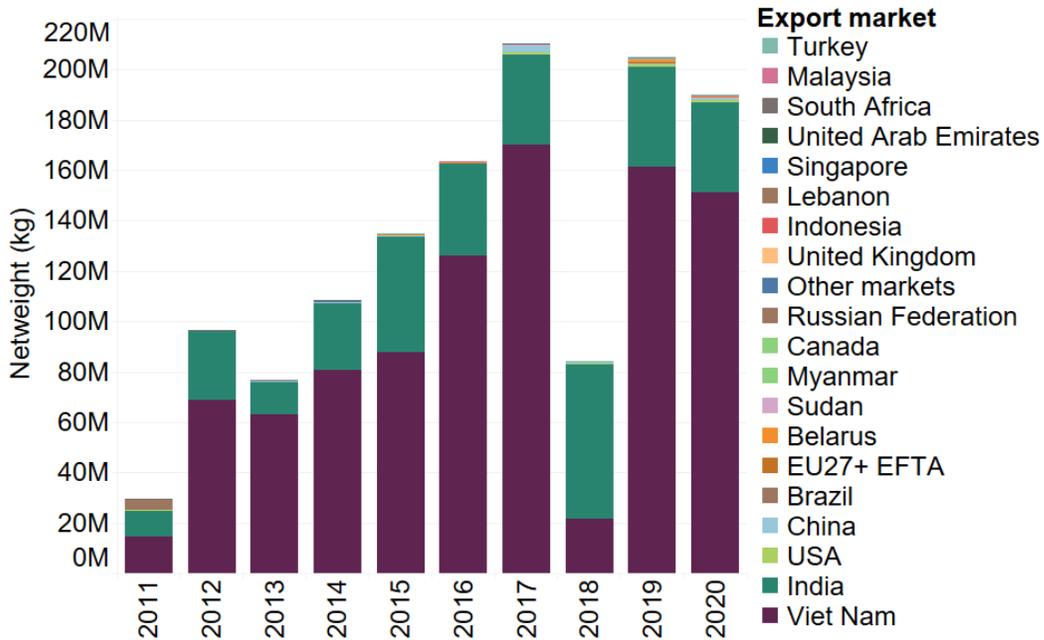
## GLOBAL SESAME PRODUCT IMPORTS FROM NIGERIA, 2019<sup>142</sup>



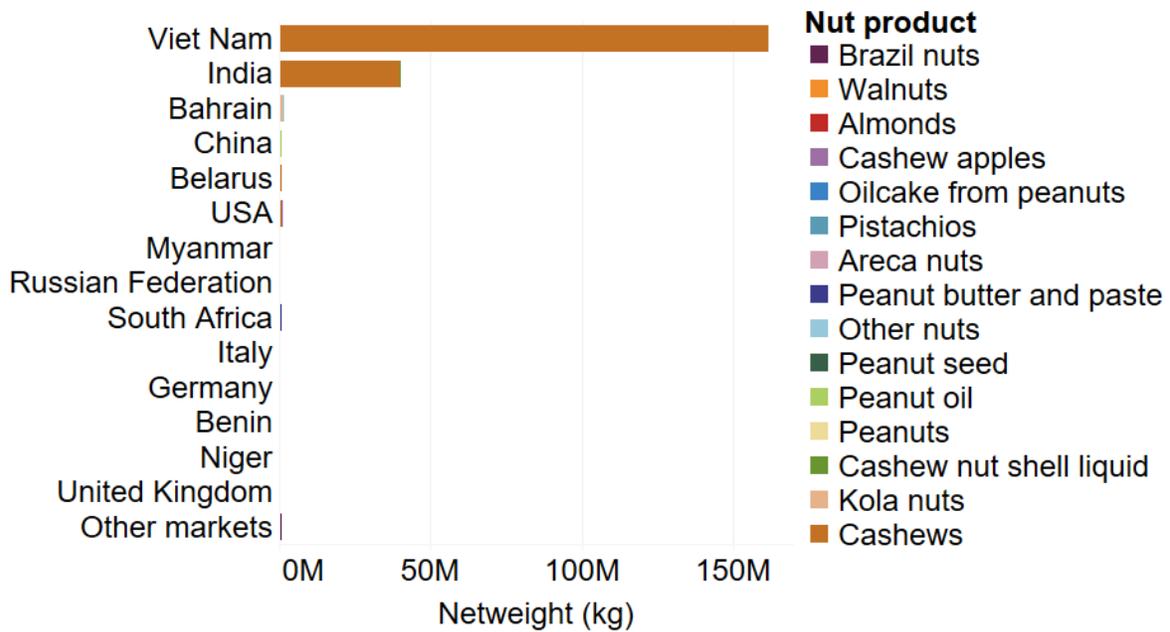
## GLOBAL NUT PRODUCT IMPORTS FROM NIGERIA, 2011-2020<sup>143</sup>



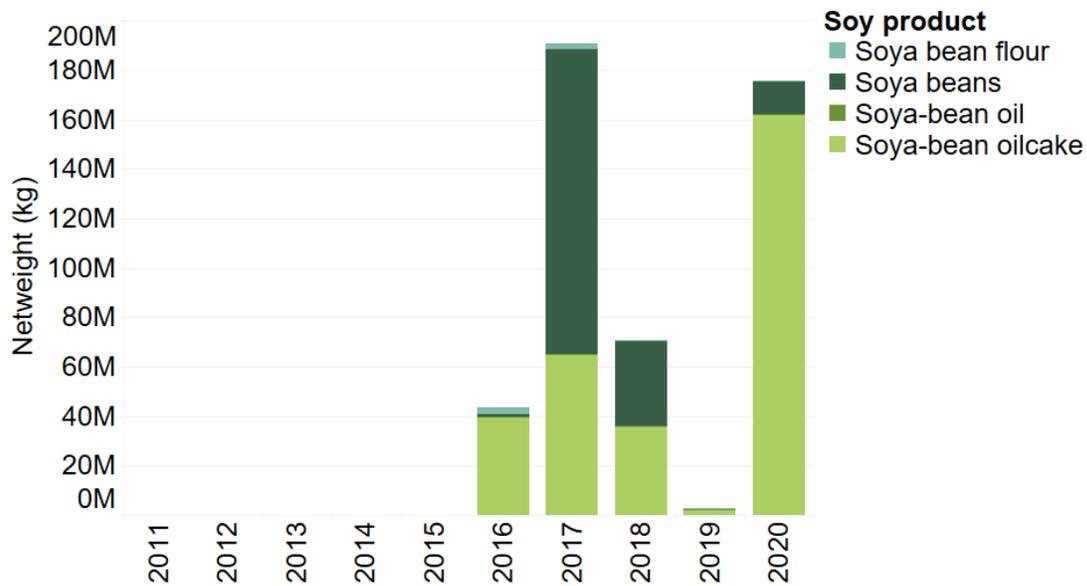
## GLOBAL CASHEW PRODUCT IMPORTS BY MARKET, 2011-2020<sup>144</sup>



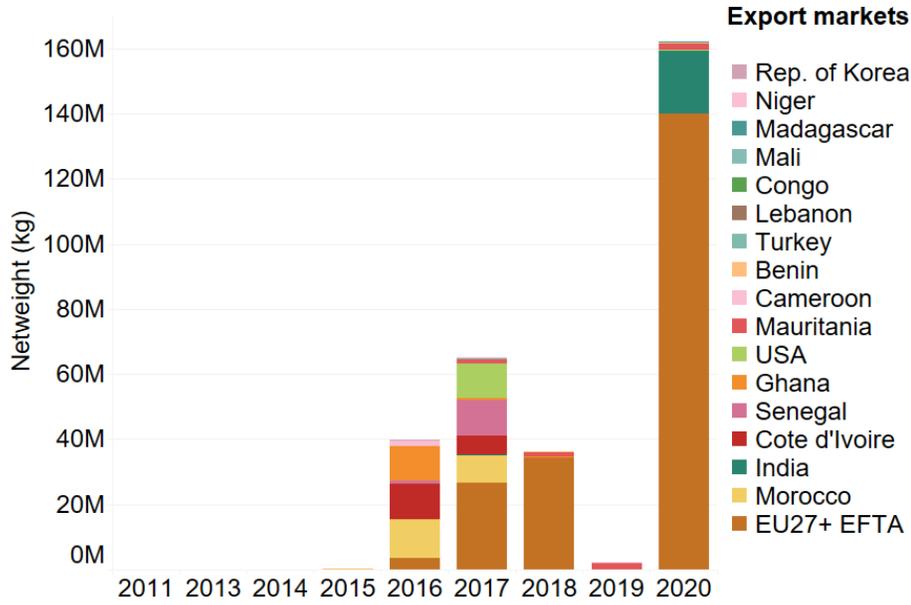
## GLOBAL IMPORTS OF NUT PRODUCTS FROM NIGERIA, 2019<sup>145</sup>



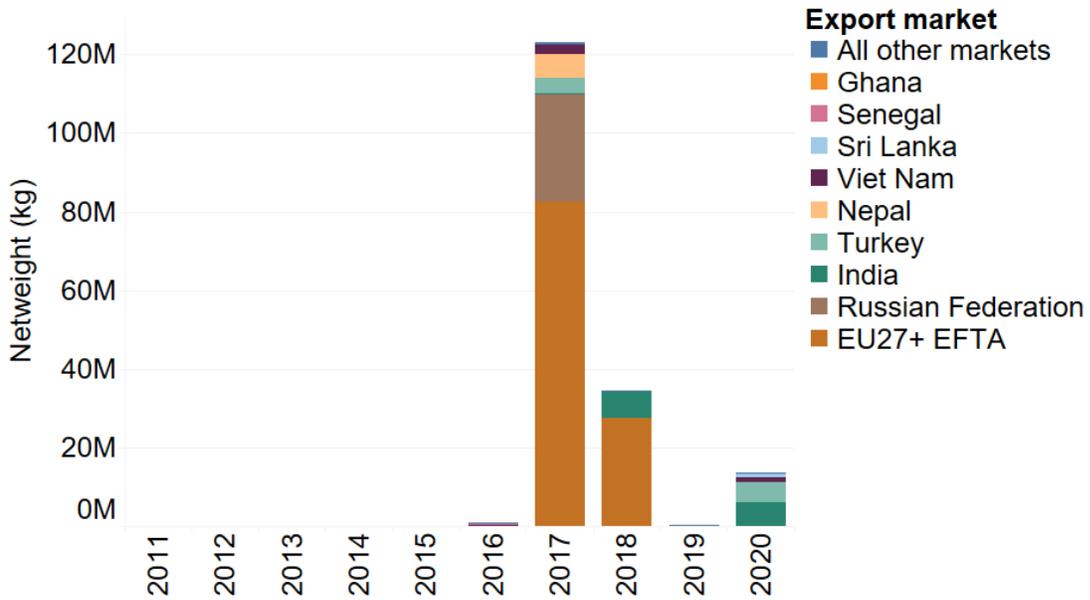
## GLOBAL SOY PRODUCT IMPORTS FROM NIGERIA, 2011-2020<sup>146</sup>



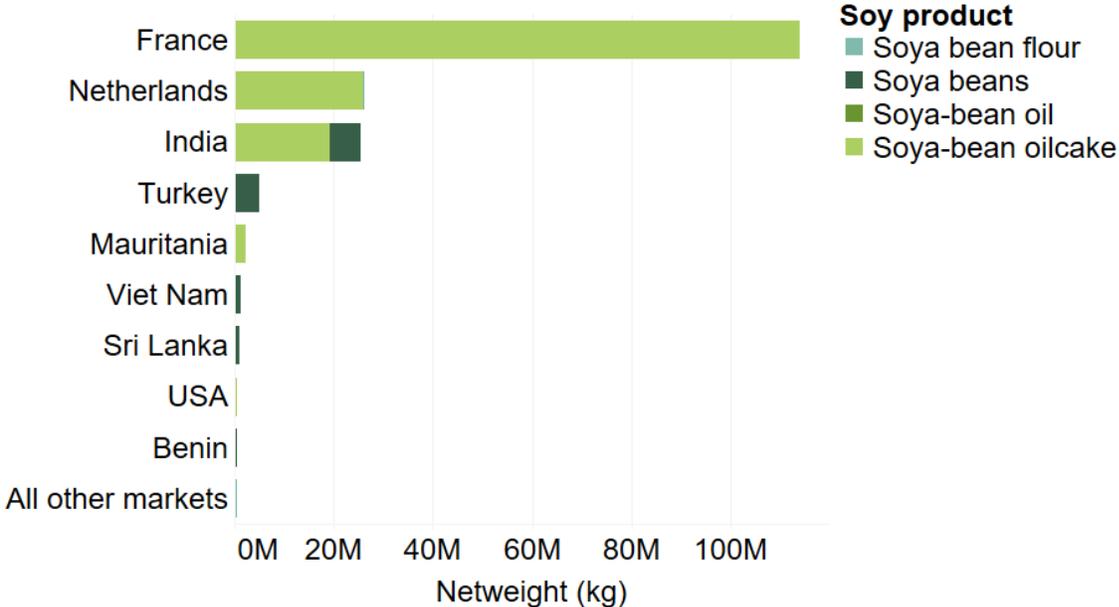
## GLOBAL SOYBEAN OILCAKE IMPORTS, BY MARKET, 2011-2020<sup>147</sup>



## GLOBAL SOYBEAN IMPORTS, BY MARKET, 2011-2020<sup>148</sup>



**GLOBAL SOY PRODUCT IMPORTS FROM NIGERIA, 2020<sup>149</sup>**



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