



Timber Legality Risk Dashboard: Peru

Drafted as of: September 2021

SUMMARY OF LEGALITY RISKS

Risk Score: 67.3 (Higher-Risk^a)¹

Conflict State: NO²

Log Export Ban in Effect: YES^{3,4,5}

Import Regulation in Effect: NO

- Illegal logging is widespread and a high percentage of Peru's timber exports are high-risk for illegal harvest.
- Fraud and corruption are common and there is a risk that illegal timber is laundered into supply chains for all species.
- Official documentation is therefore not, in and of itself, sufficient to guarantee the legal origin of timber sourced from the Amazon.
- Despite several high-profile enforcement operations that revealed systemic fraud and illegal logging, enforcement is limited and Peru still lacks a system to track or verify back to the forest.
- There have been attempts to weaken OSINFOR, the government agency charged with supervision and audit of the harvest and conservation of forest following industry pressure.
- There have been several high-profile cases under the U.S. Lacey Act, and actions taken under the United States-Peru Trade Promotion Agreement highlighting that illegal timber from Peru is entering international markets.
- Violence and land grabbing of indigenous territories continues to be tied to illegal logging in Peru's Amazon.

TRADE PROFILE^{B,C,6}

Total Imports (2019): \$1.14 billion

Total Exports (2019): \$221.64 million.
\$44.87 million (20.2%) to "regulated markets"^d

SUMMARY OF HIGHEST PRODUCT-LEVEL RISKS

Exports - Top Products Exported to the US by 2019 Value⁷

- Joinery Products (HS4418)
- Flooring, Moulding & Strips (HS4409)
- Wood Furniture - Other (HS940360)
- Sawnwood (HS4407)
- Paper (HS48)
- Marquetry (HS4420)
- Wood Furniture - Seating (HS940161 & HS940169)
- Wood Furniture - Bedroom (HS940350)
- Frames (HS4414)
- Tableware & Kitchenware (HS 4419)

Exports of logs from natural forests have been banned since 1972.^{8,9}

SUMMARY OF HIGHEST SPECIES-LEVEL RISKS

Illegal logging and trade affect many timber species, but highly valuable - often rare and endangered - species that are protected under harvest and/or trade regulations are a key target and at an elevated risk for illegality. The following species are either currently, or have recently, been protected in Peru.

CITES-Listed Species:

Appendix I:

- **Pino del cerro** (*Podocarpus parlatorei*)

Appendix II:

- **Bigleaf Mahogany** (*Swietenia macrophylla*)¹⁰
- **Cedrela spp.**¹¹
 - *Cedrela angustifolia*
 - *Cedrela fissilis*
 - *Cedrela kuelapensis*
 - *Cedrela longipetiolulata*
 - *Cedrela molinensis*
 - *Cedrela montana*
 - *Cedrela nebulosa*
 - *Cedrela odorata*
 - *Cedrela saltensis*
 - *Cedrela weberbaueri*
- **Palo de rosa** (*Aniba rosaeodora*)¹²
- **Rosewood** (*Dalbergia* spp.)

All natural forest species in Peru are high-risk.

These include:

- **Capinuri** (*Clarisia biflora*)^{13,14}
- **Virola** (*Virola* spp.)^{15,16,17,18}
- **Tornillo** (*Cedrelinga cateniformis*)^{19,20,21}
- **Capirona** (*Calycophyllum spruceanum*)^{22,23,24,25}
- **Lupuna** (*Chorisia integrifolia*)^{26,27,28}

- **Catahua** (*Hura crepitans*)
- **Cumaru/Shihuahuaco** (*Dipteryx micrantha*, *Dipteryx ferrea*, *Dipteryx charapilla*)^{e,29,30,31,32,33,34}
- **Bigleaf Mahogany** (*Swietenia macrophylla*)^{35,36,37,38}
- **Bolaina blanca** (*Guazuma crinita*)^{39,40}
- **Cachimbo** (*Cariniana domesticata*)^{41,42}
- **Cedar** (*Cedrela odorata*, *Cedrela fissilis*, *Cedrela montana*)^{43,44,45,46,47,48}
- **Copaiba** (*Copaifera reticulata*)^{49,50}
- **Huayruro** (*Ormosia sunkei*)⁵¹
- **Possumwood/Catahua** (*Hura crepitans*)⁵²

The following are plantation species and are considered lower-risk:⁵³

- **Alder** (*Alnus acuminata*)
- **Bolaina** (*Guazuma* spp.)
- **Marupa** (*Simarouba amara*)
- **Pashaco** (*Parkia velutina*)
- **Pine** (*Pinus* spp.)
- **Southern Blue Gum** (*Eucalyptus globulus*)
- **Queuña** (*Polylepis* spp.)

All tropical hardwood exports should be considered high-risk based on overall legality risk in Peru. Robust third party certification can be considered as a tool to help mitigate this high-risk, but should not constitute sufficient due diligence for legality in and of itself.

FORESTRY SECTOR

Forested Area: 72.33 million ha (31.2% protected)^{54,55}

Deforestation Rate: 0.2% annually⁵⁶

Forest Ownership:^{f,57}

- 61.48 million ha publicly-owned (84.0%)
- 11.71 million ha privately-owned (16.0%)

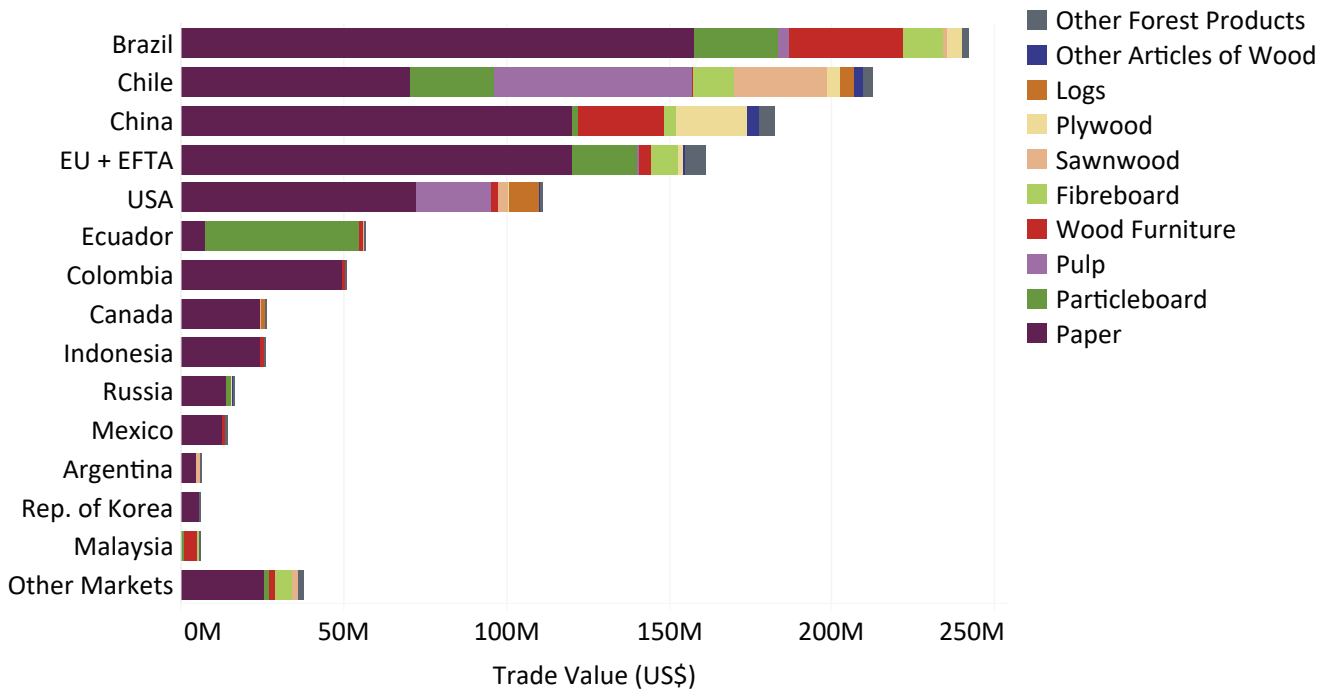
Certified Forests:

- FSC Certification: 1,056,123.85 ha (2021)⁵⁸

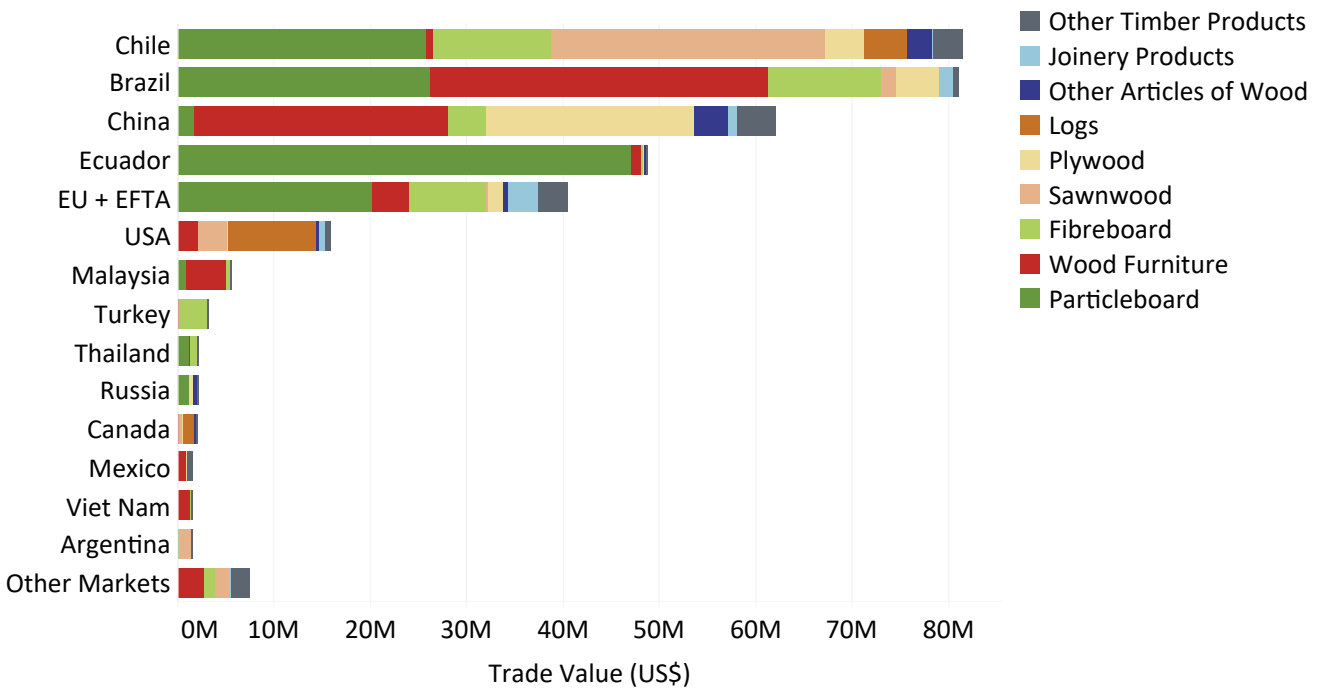
Domestic Production (2019):⁵⁹

- Wood Fuel: 7.21 million m³ (2019)
- Logs: 1.03 million m³ (2019)
- Sawnwood: 602 thousand m³ (2019)
- Plywood: 80 thousand m³ (2019)
- Veneer: 6.7 thousand m³ (2019)
- Paper: 1.23 million metric tonnes (2019)
- Charcoal: 31 thousand metric tonnes (2019)

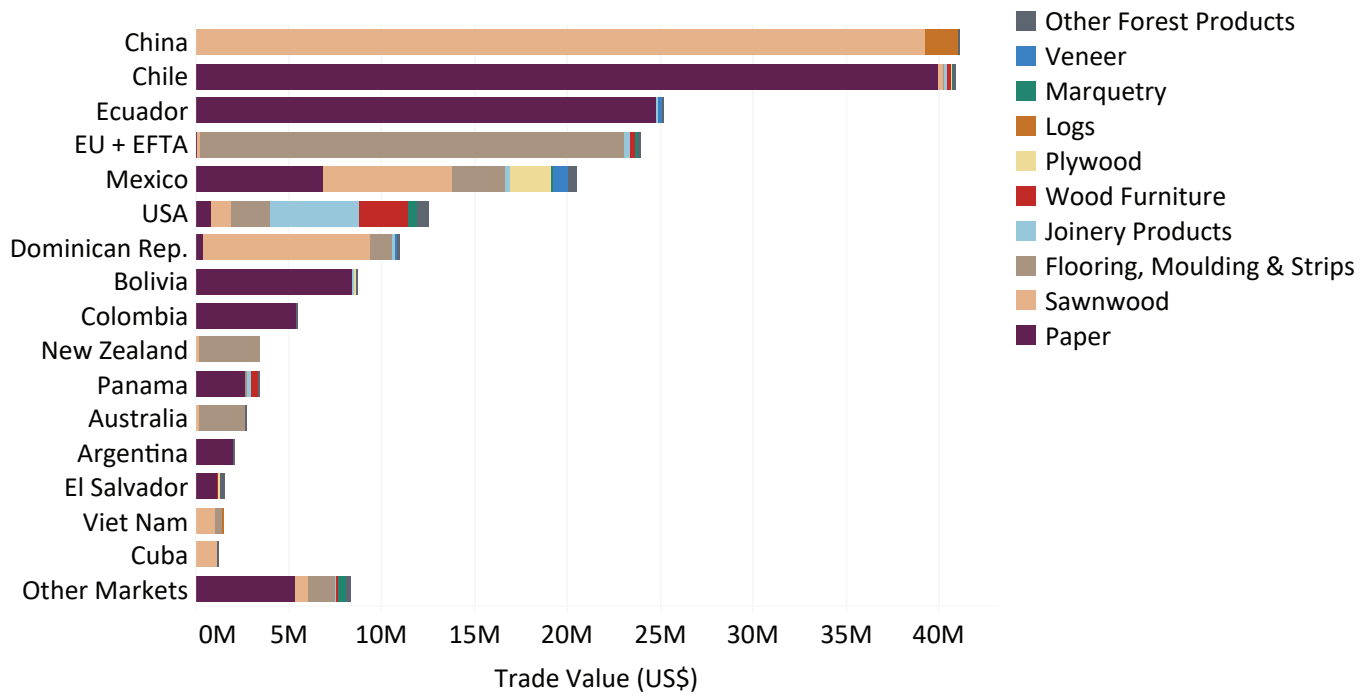
PERU'S TOP SOURCE MARKETS FOR FOREST PRODUCTS BY IMPORT VALUE (2019)^{6,60}



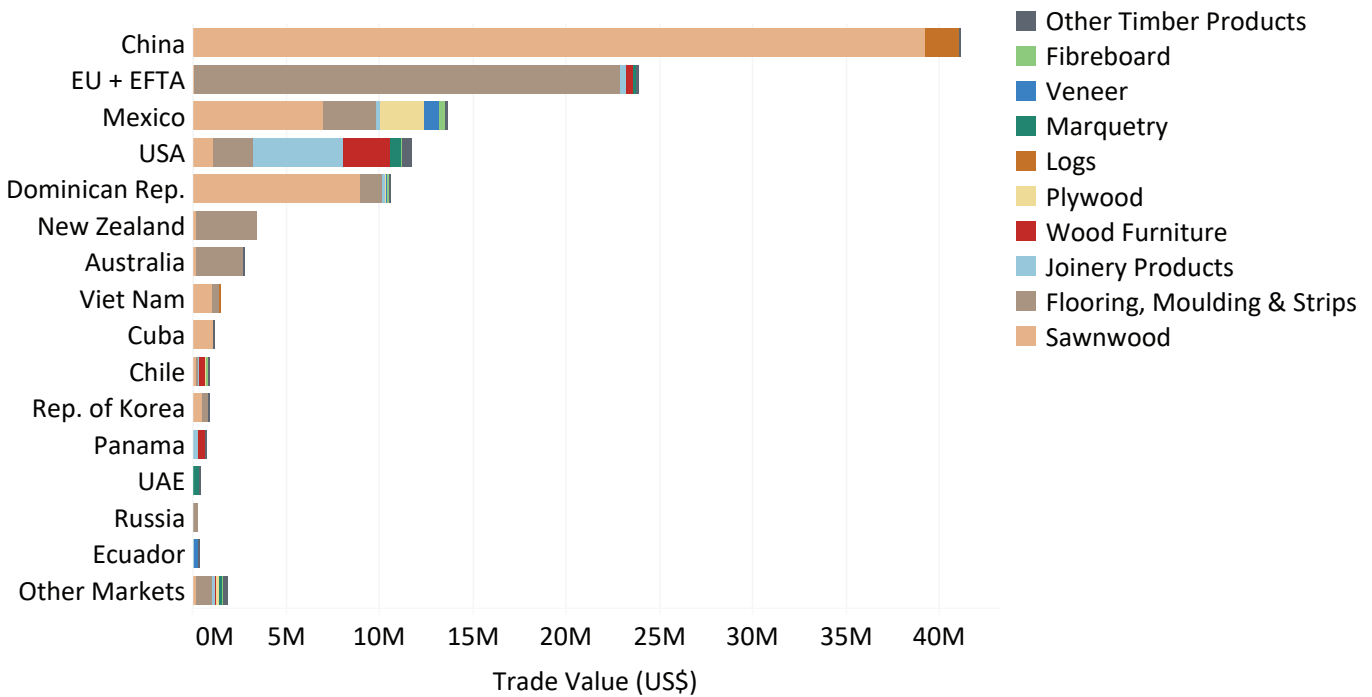
PERU'S TOP SOURCE MARKETS FOR TIMBER PRODUCTS BY IMPORT VALUE (2019)⁶¹



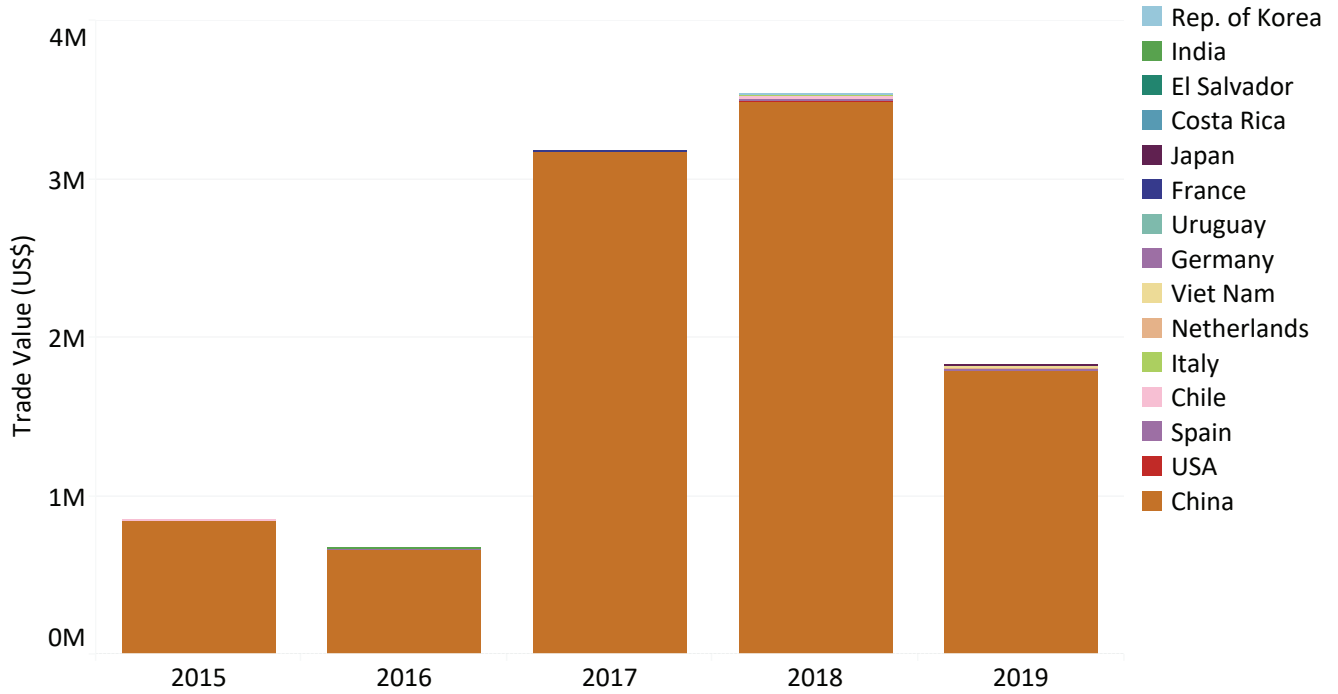
PERU'S TOP DESTINATION MARKETS FOR FOREST PRODUCTS BY EXPORT VALUE (2019)⁶²



PERU'S TOP DESTINATION MARKETS FOR TIMBER PRODUCTS BY EXPORT VALUE (2019)⁶³

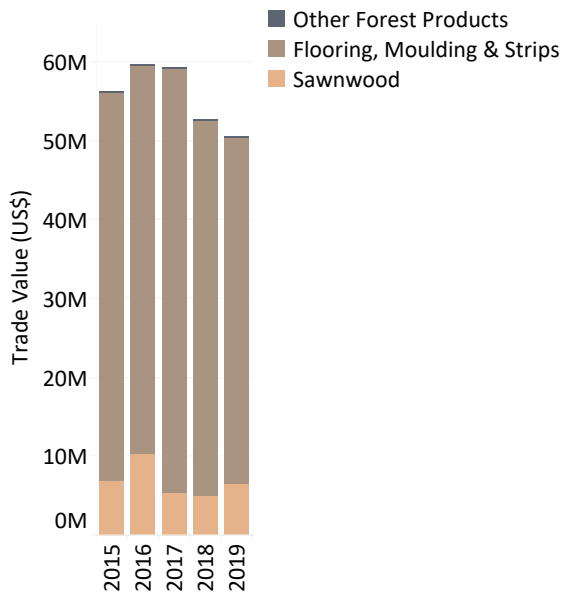


HIGH-RISK EXPORTS: LOG EXPORTS IN YEARS IN WHICH PERU HAD AN ACTIVE LOG EXPORT BAN⁶⁴ (2014-2019)^{65,66}

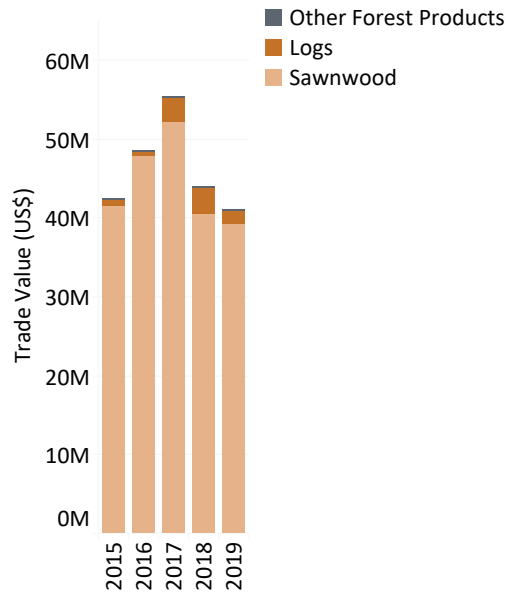


TRADE DISPARITIES: PERUVIAN EXPORTS TO CHINA AND CHINESE IMPORTS FROM PERU (2014 - 2019)^{67,68}

Peruvian Exports



Chinese Imports



- **Illegal logging is widespread and a high percentage of Peru’s timber exports are high-risk for illegal harvest.**

Peru contains the second largest area of forest in Latin America, covering more than half of the country: 72 million hectares (Mha), of which 68 Mha is rainforest in the Amazon.^{69,70} Peru also has high-altitude forest in the Andes mountains (220,000 ha) and seasonally dry coastal forest (3.6 Mha). Peru’s natural forests occupy around 71 million hectares,⁷¹ with around 1 million hectares of plantation forest as of 2020, although this figure is likely overestimated.⁷² Most of Peru’s high-value logging activities occur in the natural primary forests of the Amazon basin. In 2018, 84 percent of harvested trees were sourced from just three regions: Loreto, Ucayali, and Madre de Dios.⁷³

Illegal logging is reportedly widespread and there have been several independent studies looking at rates of illegality in the forest sector. The World Bank estimated in 2006 that around 80 percent of the timber exported from Peru is of illegal origin;⁷⁴ more recent studies report a range of figures, suggesting that between 37 and 90 percent of timber trade is likely illegal.^{75,76,77}

Several non-governmental studies have estimated the risk of illegal origin for timber exported from Peru in the period between 2008 and 2017. In 2012, the Environmental Investigation Agency (EIA) found that at least 37 percent of the mahogany and cedar shipments exported from Peru to the U.S. between 2008 and 2010 contained illegal timber.⁷⁸ In 2017, the Center for International Environmental Law (CIEL) assessed Peru’s transport documents (Guías de Transporte Forestal --GTFs) as well as the certificates of visual inspection of wood export shipments (Actas de Inspección Ocular Previa) issued by SERFOR’s Forest and Wildlife Technical Administration at the Callao seaport during 2015 and cross checked the information with the Organismo de Supervisión de los Recursos Forestales (OSINFOR) audit reports for the forest management plans that had been reviewed.^h CIEL found that 51 percent of the timber exported that corresponded with a forest management plan that had been reviewed by OSINFOR, was at high-risk for illegality.⁷⁹ A similar analysis conducted by EIA in 2018, also using the GTFs from the Callao 2015 dataset, found that 17 percent of Peruvian timber exports were illegal. An additional 29 percent of the timber was at high-risk of illegal origin, and 13 percent at mid-risk of illegal origin.^{j,80,81}

Follow up analysis to look at risk of illegal harvest for timber exported in subsequent years has reportedly been challenging. CIEL published data related to exports in the months of June, July, and August 2017, which demonstrated similar rates of illegality risk.⁸² EIA reportedly submitted repeated access-to information requests asking for the Acta de Inspección Ocular Previa for the period since 2015 but were informed that inspections for outgoing shipments had stopped.⁸³ Access to the information that would make similar studies possible has not been consistently available since.

A 2018 study from the Peruvian governmental office Unidad de Inteligencia Financiera (UIF) documented that at least 60 percent of the timber production in the country in 2015 and 2016 was illegal using a conservative methodology suggesting that the figure could be much higher.⁸⁴

- **Fraud and corruption are common and there is a risk that illegal timber is laundered into supply chains for all species.**

In March 2021, the Peruvian government published the results of a study estimating the volume of illegally harvested timber laundered into “legal” supply chains.^k *Laundered* timber is wood that is ‘legalized’ via some type of forged document at some point in the supply chain.⁸⁵ The study looked at nine regions, which accounted for more than 98 percent of regional roundwood production in 2015 and found an average of 37 percent of the timber had been illegally harvested and laundered into the supply chain.⁸⁶ The extent to which the illegally laundered timber enters international markets is not known as the study did not differentiate between the demand for local consumption or for export.^{l,87} The Peruvian forestry industry has long struggled to create a rigorous tracking system for its supply chain. Falsified licenses, unverified information, and corruption continue to be a problem.⁸⁸

Reports have indicated that the main ways in which illegal timber is fraudulently laundered into a supply chain include:

1. Falsifying a forest management plan to overstate the number of trees in the area. By exaggerating the number of trees available, timber harvested illegally from non-authorized areas (indigenous territories, campesino communities, protected natural areas, unclassified forests, etc.) or from other concessions can be approved as “legally” harvested, if the government approves the management plan without verifying the inventory data.⁸⁹

2. Fraudulent use of documentation showing timber harvest authorization for logging titles not subject to OSINFOR supervision. OSINFOR's remit excludes inspections of local forests. Forest plantations are also exempt from OSINFOR's post-harvesting audits. However, for Operation Amazonas, OSINFOR inspected management contracts in local forests. Results indicated that most of the non-existent trees were registered under forest management contracts in local forests (61.5%).^{90,91}
3. Fraudulently obtaining transport documents. GTFs can reportedly be bought and sold on the black market and are falsified to move and launder illegal timber claiming that the timber comes from one part of the forest where extraction has been approved.^{92,93}

Sawmills consistently receive and process large amounts of illegal timber.⁹⁴ GTFs can be generated from false yields and the lack of transparency on the volumes entering and leaving the industry.⁹⁵ Timber companies have reportedly claimed unlikely and potentially fraudulent roundwood to sawnwood processing rates. The high demand and purchasing power of the sawmills fuel the illegal timber trade in the country.⁹⁶

Recent reporting from InSight Crime highlights the role of bribery and corruption in facilitating the laundering of illegal timber into a supply chain in Peru. The details described by which the Patronos network was able to operate shows corruption and bribery related to police officers.⁹⁷ Furthermore, Mongabay Latam reports that between 2005 and 2020 over 600 Peruvian officials in thirteen regions approved more than 1,300 forest management plans that contained false information, facilitating the laundering of illegal timber into supply chains.⁹⁸

- **Official documentation is therefore not, in and of itself, sufficient to guarantee the legal origin of timber sourced from the Amazon.**

Some companies are circumventing the law and laundering illegal timber into supply chains by fraudulently obtaining the necessary paperwork. In addition to concerns about corruption and fraud associated with government issued documents, reports also suggest that several companies (producers and traders) holding Forest Management (FM) or Chain of Custody (CoC) Forest Stewardship Council (FSC) certificates have been trading illegally logged timber from Peru and exporting these products globally. For example, Peruvian exporter La Oroza which is currently blocked from exporting into the U.S. as a result of concerns regarding the legality of its supply, had claimed to be both FSC CoC certified as well as selling FSC-certified timber.⁹⁹ However, La Oroza had manufactured fake certificates for the timber it was exporting, with FSC suspending La Oroza's certification in 2017.¹⁰⁰ Maderera Bozovich SAC,^{101,102} and at least three other exporters holding a FSC certificate in 2018, were also reportedly exporting timber considered medium to high risk for illegal origin.^{m,103,104}

Similarly, Convention on International Trade in Endangered Species (CITES) shipments have been documented as including large percentages of illegally harvested timber.^{105,106,107,108,109} As such, official documentation is not, in of itself, sufficient to guarantee the legal origin of timber sourced from the Amazon and documents should be interrogated.

- **Despite several high-profile enforcement operations that revealed systemic fraud and illegal logging, enforcement is limited and Peru still lacks a system to track or verify back to the forest.**

Fraud and illegal logging are generally detected in isolated operations carried out by the enforcement agencies, which can only cover a very small fraction of Peru's forests. For example, Operation Amazonas led by Peru's Customs and Taxation agency Superintendencia Nacional de Aduanas y de Administración Tributaria (SUNAT), with support from Interpol and the World Customs Organization, found that over 90 percent of timber analyzed in that operation could be of illegal origin, and started alerting the relevant authorities in the countries the timber was destined for.ⁿ This resulted in seizures estimated at more than 15,000 cubic meters of timber, with a value of around \$20.6 million in 2014.^{110,111} A follow up operation in 2015, largely focused on exported timber from Iquitos port to the U.S. and Mexico, resulted in seizures of approximately \$47 million worth of timber and the arrest of 328 individuals.^{112,113}

SERFOR announced a commitment to improve traceability in 2019, publishing three new sets of "resoluciones ejecutivas" (executive resolutions) to improve tracking and controls in the forest supply chain. These enforceable directives laid out the documentation required to comply with the Peruvian Forest Law of 2011 and subsequent regulations (largely finalized in 2015). The main technical document, approved on December 28, 2020, is called "Traceability of the Forest Timber Resources"

("Trazabilidad de los Recursos Forestales Maderables") and establishes guidelines for timber tracking while the other two directives mandate changes for forest and sawmill industries.^{114,115,116,117} This new format is expected to allow forest harvests to be checked against approved management plans more easily and requires sawmills to reconcile the volume of logs processed against the volume of wood delivered to the processing mill. These changes are expected to help improve traceability and transparency within the supply chain.¹¹⁸ After the removal of the director of SERFOR, Luis Alberto Gonzales-Zúñiga, the implementation of the traceability regulation and supporting tools in Peru was greatly delayed.^{9,p119,220,121}

- **There have been attempts to weaken OSINFOR, the government agency charged with supervision and audit of the harvest and conservation of forest following industry pressure.**

OSINFOR's role in post-harvest auditing and the inspection reports produced has been considered the most reliable and useful evidence of compliance with national and international timber trade regulations.¹²² Neither SERFOR nor the regional forest offices operate an open-source system through which interested parties can verify documents and demonstrate the legality of a Peruvian timber product. OSINFOR's field verification work has reportedly been possible as result of the autonomy and functional independence of the institution.¹²³

As a result of Operation Amazonas (as well as other special operations) and public reports with evidence demonstrating illegal timber trade, a number of Peruvian and foreign authorities took action against the Peruvian illegal timber trade and its actors. This reportedly led to a faction of the industry and Peruvian government joining forces to reduce traceability and eliminate the ability to access the data required to differentiate legal from illegal timber. For example, during the 2015 Operation Amazonas, forest investigation officials in Peru became the targets of death threats and violent protests with at least one forest inspection office set on fire.^{124,125} In 2016, the Executive President of OSINFOR, Rolando Navarro was dismissed by the Peruvian government, which was followed by a period of efforts to erode the independence and powers of OSINFOR.¹²⁶

In 2018, the government relocated OSINFOR to a "subordinate position" in its Ministry of Environment (MINAM).¹²⁷ The move was widely criticized as it reportedly weakened the independence and institutional capacity of OSINFOR and further eroded transparency related to the legal origin of wood throughout the supply chain.¹²⁸

In 2019, Peru withdrew its previous decision to move OSINFOR within MINAM following the United States requesting consultations regarding concerns about Peru's forest sector obligations under the 2007 U.S.-Peru Trade Promotion Agreement (PTPA). The consultations were requested on the grounds that the relocation conflicted with a provision in the Environment Chapter's "Annex on Forest Sector Governance" (Forest Annex), which states that "OSINFOR shall be an independent and separate agency."^{129,130} In April 2019, Peru moved OSINFOR back to its original location.^{131,132}

- **There have been several high-profile cases under the U.S. Lacey Act, and actions taken under the United States-Peru Trade Promotion Agreement highlighting that illegal timber from Peru is entering international markets.**

Under the PTPA, the U.S. has a duty to "deny entry to a shipment that was the subject of verification" and deny entry to products where an enterprise "knowingly provided false information to Peruvian or United States officials" regarding the contents of the shipment.¹³³ In 2015, when Peruvian authorities notified U.S. officials that a shipment of timber lacked the documents to verify the legality of the timber, U.S. authorities seized 24 pallets. The timber was subsequently found to have been harvested in Peru without proper authorization as required under Peruvian law and the timber was destroyed in 2017 as part of a settled agreement that the U.S. government reached with the U.S. importer.¹³⁴

U.S. authorities also seized 1,300 cubic meters of timber from the Yacu Kallpa cargo ship in 2015 following intelligence that the timber on board had been illegally logged in Peru. Investigations determined that 92 percent of the shipment was illegal. The Peruvian supplier La Oroza Inversiones (La Oroza) was subsequently blocked in 2017 from importing into U.S. under the enforcement provisions of the PTPA Forest Annex. In 2020, the U.S. announced that it would continue to block future timber imports from La Oroza.¹³⁵ In September 2021, the U.S. importer Global Plywood pleaded guilty to violating the Lacey Act and failing to exercise due care when it imported 1,135 cubic meters of virola on the Yacu Kallpa in 2015.¹³⁶ Global Plywood was ordered to pay \$200,000 in restitution to the Ministry of Environment of Peru and a \$5,000 fine.¹³⁷

In 2019, a second Peruvian timber exporter was also blocked from importing into the U.S. following evidence that Inversiones WCA EIRL (WCA) was trading illegally harvested timber.¹³⁸ Recent reports in 2021 from Mongabay Latam and OjoPúblico suggest that new trading companies and routes have now been established so there remains a risk that illegal timber

originating from La Oroza could enter the US market.¹³⁹ Specifically, OjoPúblico reports that the company P&O Exportaciones e Importaciones is affiliated with La Oroza and continues to export internationally to Mexico and the Dominican Republic.

- **Violence in indigenous territories continues to be tied to illegal logging in Peru's Amazon.**

There have been a number of high-profile murders linked to land grabbing in Peru. In 2013 Mauro Pio Peña, an indigenous leader who spoke out against illegal logging, was killed. This was followed in September 2014 by the murders of Edwin Chota and three members of the Ashéninka community, all indigenous environmental activists, who were reportedly bound and shot by illegal loggers.¹⁴⁰ Chota was a persistent denouncer of illegal logging in Ucayali and had been writing letters to the Peruvian authorities protesting against the wrongful seizures of indigenous land rights and defending their ancestral lands for more than a decade.¹⁴¹

REPORTS & ADDITIONAL RESOURCES

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

Key Reading:

1. Rodriguez, Alfredo. 2020. "Peeling Back the Bark: Timber Tracking and Regulations Controlling the Peruvian Forest Supply Chain". Forest Trends.
2. Government of Peru, Superintendencia de Banca, Seguros Y AFP. 2018. "Sectorial Assessment of Exposure to Money Laundering and Terrorist Financing Risks in the Peruvian Timber Sector." Superintendencia de Banca, Seguros Y AFP.
3. Urrunaga, Julia, Andrea Johnson, and I. Dhayneé Orbegozo Sánchez. 2018. "Moment of Truth: Promise or Peril for the Amazon as Peru Confronts its Illegal Timber Trade." Environmental Investigation Agency.
4. Center for International Environmental Law. 2017. "'Continuous Improvement' of Illegal Logging in Peru." Center for International Environmental Law.
5. Conniff, Richard. 2017. "Chasing the Illegal Loggers Looting the Amazon Forest." *Wired*, October 24.
6. Urrunaga, Julia, et al. 2012. "The Laundering Machine: How Fraud and Corruption in Peru's Concession System are Destroying the Future of Its Forests." Environmental Investigation Agency.

REPORTS & ADDITIONAL RESOURCES

^a Risk scores reflect Preferred by Nature's Timber Risk Assessment which measures the risk of illegality occurring in 21 areas of law relevant to timber legality, as well as Forest Trends' national governance scores which provides an average relative governance and corruption risk score for 211 countries globally. Preferred by Nature's scores have been flipped to ensure compatibility with Forest Trends' national governance scores, where higher scores are associated with greater governance and corruption challenges. An average of both the Preferred by Nature and Forest Trends scores has been calculated for 66 countries where both are available as of 2021. For all other countries, the risk score reflects Forest Trends' national governance scores. 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." It is important to note that it is possible to source illegal wood from a well-governed, "Lower Risk" state and it is also possible to source legal wood from a "Higher Risk" country. As such, the risk scores can only give an indication of the likely level of illegal logging in a country and ultimately speaks to the risk that corruption and poor governance undermines rule of law in the forest sector.

^b The term "forest products" is used to refer to timber products (including furniture) plus pulp and paper. It covers products classified in the Combined Nomenclature under Chapters 44, 47, 48 and furniture products under Chapter 94. While the term "forest products" is often used more broadly to cover non-timber and non-wood products such as mushrooms, botanicals, and wildlife, "forest products" is used to refer to timber products plus pulp and paper in this dashboard.

- ^c Except where otherwise specified, all trade statistics and chart data s sourced from UN Comtrade, compiled and analyzed by Forest Trends.
- ^d Regulated markets reflect countries and jurisdictions that have developed operational measures to restrict the import of illegal timber. As of 2021, this included the U.S., Member States of the European Union (as well as the United Kingdom, Iceland, Liechtenstein, Norway and Switzerland), Australia, Canada, Colombia, Indonesia, Japan, Malaysia, South Korea and Vietnam. Some measures are more comprehensive in scope, implementation, and enforcement than others.
- ^e *Dipteryx odorata* and *D. alata* do not occur in Peru. Timber harvested in the south of the Peruvian Amazon as *D. micrantha* or *D. odorata* is likely, in fact, *D. ferrea*; while timber extracted in the north is considered *D. micrantha*.
- ^f Forest ownership as of 2015 according to FAO FRA, "Global Forest Resources Assessment, Peru" published in 2020.
- ^g All references to "EU + EFTA" signify the 27 Member States of the European Union, as well as the United Kingdom, Iceland, Liechtenstein, Norway and Switzerland.
- ^h Once the harvesting season is over, OSINFOR inspects forest management activities, publishing its findings in the form of either a green or red risk report. Red ("risky") reports indicate that the harvesting operations failed to comply with forest regulations and are thus being sanctioned or suspended. However, OSINFOR forest field post-harvesting inspections are randomized. Therefore, only a limited number of harvesting plots – roughly 50 percent – are inspected each year.
- ⁱ The 865 Visual Inspection Certificates (part of the random sampling for inspection at export from the Port of Calleo in 2015) correspond with 2,364 Forest Transport Permits (GTFs) and 347 logging titles. These were found to relate to 67 Peruvian exporters and 186 international importers. From the 2,364 GTFs, 48 percent had not been supervised/inspected by OSINFOR and 18 percent did not indicate the Forest Management Plan (FMP) harvest year which is required to determine the area identified for harvest, and 0.55 percent of GTFs were illegible. The remaining 791 (33 percent) contained Forest Management Plans that had been supervised by OSINFOR and could be assessed by CIEL to show any illegalities associated with the timber. Of the 791 GTFs containing FMPs supervised by OSINFOR, 51 percent of the GTFs included high-risk FMPs ("red list") and 49 percent include FMPs with a negligible or nonexistent risk for illegal timber trade ("green list").
- ^j Compilation by Environmental Investigation Agency of public OSINFOR data and data acquired from SERFOR through a Freedom of Information request (sample for 2015 timber exports from port of Callao).
- ^k This study and complementary ones, produced by the Peruvian Presidency of the Council of Ministers (PCM) with the support of USAID and the US Forest Service through its project in Perú, FOREST, and FAO-UE FLEGT, are available in English and Spanish at this PCM link: <https://www.gob.pe/institucion/osinfor/informes-publicaciones/1775696-estudio-estimando-y-mejorando-la-legalidad-de-la-madera-en-el-peru>.
- ^l To explain the inconsistencies and distortions found in the results, the authors acknowledge that the accuracy and reliability of the data is questionable. "The method of using the difference between supply and demand presents weaknesses, however, owing to potential discrepancies in data sources. For supply, for instance, there are statistical errors relating to record control, storage, and maintenance. For demand, the weaknesses have to do with the use of survey data and the accuracy, validity, completeness, openness, and honesty of responses. For these reasons, the index should be used with caution." (PCM, et al., "Estimating and Improving Timber Legality in Peru. Index and Percentage").
- ^m Grupo Vargas Negocios Amazónicos SAC, Consorcio Maderero SAC, Maderera Río Acre SAC.
- ⁿ Other authorities involved include the Agency for Supervision of Forest Resources and Wildlife, OSINFOR, and the Special Environmental Prosecutor's Office, FEMA.
- ^o The updated format of one supporting tool to the traceability regulation called "*Book of operations of primary transformation centers for timber forest products and by-products, and Instructions for its use and information registry*", was approved and went into effect on March 31, 2021. In September 2021, key government institutions, including SERFOR and OSINFOR met with concession holders, industry, forestry agents and operators to define strategic actions in the sector including addressing issues for the implementation of this tool. Participants proposed the elaboration of a forestry control protocol. The Regional Management of Forestry and Wildlife Development (GERFOR) has planned additional strategic meetings with key forestry stakeholders in 2021.
- ^p After Gonzales-Zúñiga departure on June 5, 2020, the Peruvian Society of Environmental Law (SPDA) expressed its concern about the abrupt removal of the publicly appointed Director. Fourteen months (August 2021) after his dismissal, the Superior Court of Justice of Lima (Décimo Juzgado Constitucional de la Corte Superior de Justicia de Lima) ordered the Ministry of Agrarian Development and Irrigation (Midagri) to reinstate Gonzales-Zuñiga as head of SERFOR.

WORKS CITED

- ¹ Forest Trends. 2021. "Global Illegal Deforestation and Associated Trade (IDAT) Risk Data Tool—Summary of Data and Methodology." Forest Trends. Accessed June 30, 2021. <https://www.forest-trends.org/wp-content/uploads/2020/03/Methodology-for-ILAT-Risk-Data-Tool-March-2020.pdf>
- ² World Bank Group's Fragile, Conflict and Violence Group. 2020. "Harmonized List of Fragile Situations." World Bank Group's Fragile, Conflict and Violence Group. Accessed June 30, 2020. <https://www.worldbank.org/en/topic/fragilityconflictviolence/brief/harmonized-list-of-fragile-situations>
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The Dashboards have been compiled from publicly available information sources to support risk assessments on the legality of timber products entering international supply chains. The Dashboards are for educational and informational purposes only. The Dashboards have been drafted with input from the Environmental Investigation Agency (EIA) and are subject to external peer review. The Dashboards will be updated periodically based on newly available information.

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