



**“KPOKOLO”: A NEW THREAT TO
LIBERIA’S FORESTS**

Credit: The DayLight/James Harding Grahnyue

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EXECUTIVE SUMMARY

Between October and December 2022, Forest Trends conducted a survey to assess the chainsaw milling sector (also known locally as pitsawing) in Liberia. The survey included 267 stakeholders, from chainsaw millers themselves to county-level timber dealers, community representatives, and dealers and business leaders in the wood markets in the capital, Monrovia. The methodology from the last major survey of the sector in 2016¹ was followed, including new elements: (i) the involvement of big companies, (ii) the move towards exports, and (iii) structural changes that may be strengthening political-business elites and weakening chainsaw miller crews.

MAIN FINDINGS

Note: This paper was prepared in February 2023, only shortly after the FDA announced a ban on the transport of kpokolo; see “Has there been an official response?” on page 20.

¹Holt, Jennifer. 2017. Liberia: domestic timber value chain analysis. Building Markets. <https://buildingmarkets.org/liberia-domestic-timber-value-chain-analysis/>.



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- This study sought to collate currently available information. Fieldwork revealed a new and growing threat to Liberia’s forests and the communities that depend on them: “Kpokolo,” or “blockwood.” Kpokolo describes squared timber or large blocks of timber being produced by chainsaw milling (Figure 1). As a relatively new product, very little is known about the kpokolo supply chain.
- Kpokolo is a threat to the sustainable management of Liberia’s forests for economic benefit – to local communities and the country as a whole. It also threatens climate change mitigation and preservation of the largest remaining area of the biodiverse Upper Guinea Forest.² Kpokolo production is being used as a work-around to Liberia’s existing laws and regulations. Lack of timber sector control of this supply chain is allowing larger companies to squeeze out artisanal operators who have traditionally supplied the domestic market, while avoiding the rules in place to control the formal sector.

FIGURE 1 Examples of kpokolo



Credits (left to right, top to bottom): Civil Society-led Independent Forest Monitoring (CS-IFM) August 2019 (Lofa County); Liberia Forest Media Watch (LFMW) April 2022 (Lofa County); The DayLight August 2022 (Gbarpolu County); The DayLight September 2022 (Bassa County).

²Agyeman et al, 2022, Sustainable Forest Management (SFM) in Liberia — The 4Cs Approach; p.4; www.fda.gov.lr/sites/default/files/documents/sfm-document.pdf.



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- Kpokolo can be distinguished from other forms of chainsaw-milled timber by its larger dimensions, tendency toward high-value, durable species (mainly ekki), the involvement of big business and foreigners, and the focus on exports (mainly through containers from Liberia's ports or over land). It's likely to generate higher profits and therefore attract bigger companies, more mechanisation, and bigger political-business interests.
- It is not clear how much kpokolo (or other chainsaw-milled timber) comes from forest permit areas and from outside any such area, and there is no legal definition for it. However, this survey indicates that most chainsaw milled timber is either i) not coming from a permit area, or ii) the operators or communities do not make any distinction between area of origin.
- A clear distinction exists in the legal framework between timber for the domestic market (mainly lower-value species as detailed in the 2016 survey) and high-value species for export. This aims to ensure greater emphasis on long-term management of the high-value species, but is being undermined by kpokolo. Reinforcing this distinction is critical for biodiversity conservation in Liberia and the wider West African region.
- The informal nature of the chainsaw milling and kpokolo sectors, with often only verbal agreements with local community leaders, means there is little incentive for stakeholders to report illegalities, a challenge the new Chainsaw Milling Regulation aims to address.
- In February 2023, recognising it was out of control, Liberia's Forestry Development Authority (FDA) reportedly banned transportation of kpokolo.³ No official statement or document regarding this ban has been found, so it remains unclear whether this is a true ban. Since there has been no formal public announcement to this effect, it is easy for companies to deny knowing illegality, and therefore easy to side-step any subsequent accusation that the ban has not been enforced. However, enforcement action has recently been taken against some of the operators highlighted in this research.
- The rise in kpokolo may be having a negative effect on the availability of chainsaw milled timber in the domestic market, affecting the livelihoods of thousands of people engaged in this industry.⁴ Big-business kpokolo is pushing other chainsaw millers out of business. The Liberia Chainsaw and Timber Dealers Union (LICSATDUN) exists to protect the rights of chainsaw millers, yet in a workshop held in December 2022, both the LICSATDUN and expert resource people commented that, “kpokolo is not chainsaw milling.” The Union may need to actively promote the recently adopted Chainsaw Milling Regulation to help limit kpokolo.
- The results of this survey are not sufficient to show systematic information on kpokolo from which conclusions can be drawn about its scale across Liberia, but results do uncover sufficient cases to suggest the threat is real and significant. This report aims to help inform those in a position to bring this issue into the open and push for ongoing reforms centred on implementation of the new Chainsaw Milling Regulation and the wider process to bring Liberia's forest sector under rule-of-law.

³Harding Giahnye, James. 2023. “FDA Bans ‘Kpokolo’ Timbers.” The DayLight. <https://thedaylight.org/2023/02/15/fda-bans-kpokolo-timbers/>.

⁴Holt, Jennifer. 2017. Liberia: domestic timber value chain analysis. P 8. Building Markets. <https://buildingmarkets.org/liberia-domestic-timber-value-chain-analysis/>.



Introduction

Between October and December 2022, Forest Trends conducted questionnaires across Liberia, covering 276 chainsaw millers themselves, county-level timber dealers, community representatives, and dealers and business leaders in the wood markets in Monrovia (Table 1; Figure 2). The survey aimed, within the budget and time available, to update the survey conducted in 2016 by USAID-supported Building Markets.⁵

During the research, the team identified concern about a new type of chainsaw milling, locally called “kpokolo,” which has not been covered much by researchers. Neither Blackett, Lebbie, and Marfo (2009) nor the Building Markets survey (2016) refer to blockwood.⁶ This report seeks to gather currently available information on this growing threat to Liberia’s forests. This paper was prepared in February 2023, only shortly after the FDA announced a ban on the transport of kpokolo.

TABLE 1 Number of people surveyed across counties in Liberia, November-December 2022

County	Chainsaw operators	County-level dealers	Community leaders	Monrovia dealers	Monrovia plankfield chairpersons & LICSATDUN monitors	Checkpoint officials (FDA & LICSATDUN)	Total (# people)
Bassa	14	2	8			1	25
Bong	12	12					24
Gbarpolu	18	1	2				21
Lofa	21	8	8				37
Monrovia				56	19		75
Nimba	15	13	7		1	1	37
Rivercess	24	3	3				30
Cape Mount	10	9	8				27
Total (# people)	114	48	36	56	20	2	276

Note: The team was unable to conduct any survey interviews in Sinoe and Maryland.

⁵Holt, Jennifer. 2017. Liberia: domestic timber value chain analysis. Building Markets. <https://buildingmarkets.org/liberia-domestic-timber-value-chain-analysis/>.

⁶See page 18, “Evidence of bribes, or kpokolo-specific payments” for further details. The word kpokolo does not seem to have been in common use at the time of these studies.



FIGURE 2 Map of Liberia indicating counties



Source: United Nations

What is kpokolo?

“I came across it one time. The one I saw it was about eight to nine inches thick. I have not seen them taking wood like that.” – [Grand Bassa Respondent 4]⁷

Most conventional chainsaw milling in Liberia has produced planks one- or two-inches thick, using a wide range of tree species, to meet the demands of the domestic market. The practice expanded in the years after a 14-year civil conflict, when all logging concession agreements were declared null and void by Executive Order, creating a situation where there was no legal way to produce timber in the country. Chainsaw milling, or pitsawing, as it is historically and commonly called, filled this gap, particularly to meet the need for timber in post-conflict reconstruction. It also became a livelihood for innumerable ex-combatants.

⁷Through this report, survey respondents, unpublished notes from field researchers, and anyone mentioned in these documents have been anonymised (company names have been retained). The codes used only identify the county where the person is based: Bong = BG, Gbarpolu = GP, Grand Bassa = GB, Grand Cape Mount = CM, Greater Monrovia = MN, Lofa = LF, Maryland = ML, Nimba = NB, and Rivercess = RC. Names published in media stories have not been anonymised and instead have hyperlinks to the source.



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It has been “generally regarded as a ‘necessary evil’,”⁸ which has been sufficient to justify introducing a tax on the quantity of planks passing Liberia’s roadside checkpoints, the waybill fee “a very low rate of US\$0.60 per plank regardless of size,” even when the practice itself was not yet legal.⁹

In contrast, kpokolo describes larger dimension timber “blocks” (up to six inches thick, often less than the standard 10 or 12 inches wide and sometimes only half the standard 14 feet long), of a few, high-value species (Ekki or *Lophira alata*, LOP, also known as Azobe – in particular). There are examples of kpokolo with only the curved cants removed from the log (Figure 1), but most kpokolo appears to be milled enough to be lifted by a team of people. Compared to round logs, however, it is easier to pack into a shipping container. The minimal dimensioning of kpokolo also makes the timber more attractive to the export market, which is where the processing facilities are and is orientated towards buying Liberian timber in log form (compared to already processed logs in the form of narrow planks).

Legal status

Although kpokolo refers to large blocks of wood, there is no legal definition of kpokolo or blockwood that distinguishes it from any other form of chainsaw milling.¹⁰ Following the National Forest Reform Law in 2006, the legal regime for chainsaw milling first came into place in 2011. The definitions in both this and the current 2022 regulation only state, “Chain-saw Milling: Means harvesting and on-site conversion of logs into boards/lumber using chainsaws,” and the definition of a chainsaw includes electric and internal combustion engine-driven power saws. Given that the domestic market demands smaller planks than kpokolo, re-sawing of the blockwood is required, and therefore, arguably, kpokolo would be illegal under the chainsaw milling regulation that requires on-site conversion. On-site conversion would generate more local jobs and possibly avoid tax evasion, although processing by sawmills rather than chainsaws is much more efficient for conversion of logs into merchantable timber. (See “What is the scale of kpokolo operations?” on page 11 for evidence that mobile mills are used by some kpokolo producers.)

The 2011 regulation is explicit that chainsaw milling is only to be permitted in community forests or private forests.¹¹ The 2022 regulation elaborates on this, detailing how chainsaw milling is only to be permitted in areas holding a Timber Sale Contract, Community Forest Management Agreement, or Private Use Permit, and explicitly prohibiting chainsaw milling in areas designated as Forest Management Contract, Forest Use Permit, Protected Area, or Proposed Protected Area.¹² It goes on to provide a channel for chainsaw milled timber to be entered into LiberTrace and, in the future, export, provided operators have demonstrated compliance, including with the FDA’s Specialized Chain of Custody System.¹³ By implication, any logging outside the designated permit areas is illegal, be it logs, lumber, chainsaw milled planks, or kpokolo.

⁸Blackett, Lebbie, and Marfo. 2009. Chainsaw logging in Liberia, p.63. Academia.edu. www.academia.edu/17376660/Chainsaw_Logging_in_Liberia_An_Analysis_of_Chainsaw_Logging_Pit_Sawing_in_the_Natural_Forests_of_Liberia_Towards_a_more_Sustainable_Production?auto=download.

⁹ibid. p.9.

¹⁰Forestry Development Authority (FDA). 2022. Regulation 102-22 on Chainsaw Milling; “in 2011 the FDA, in consultation with stakeholders, promulgated FDA Regulations 115-11 to create a legal regime to govern chainsaw milling”; www.fda.gov.lr/sites/default/files/documents/Chainsaw%20Milling%20Regulation%20%20Proposal.pdf. Section 28 of the 2022 regulation repeals the 2011 regulation.

¹¹FDA, 2012, Regulation 115-11 on Chainsaw Milling; Section 2(i); <http://faolex.fao.org/docs/pdf/lbr160033.pdf>.

¹²FDA, 2022, Regulation 102-22 on Chainsaw Milling; Section 3; www.fda.gov.lr/sites/default/files/documents/Chainsaw%20Milling%20Regulation%20%20Proposal.pdf.

¹³FDA, 2022, Regulation 102-22 on Chainsaw Milling; Sections 12 and 17(d); www.fda.gov.lr/sites/default/files/documents/Chainsaw%20Milling%20Regulation%20%20Proposal.pdf.



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In the survey, 19 (out of 144) chainsaw operators and 14 (out of 36) community leaders said “yes, the forest had some form of title deed and/or permit” (87 said no, and 30 either said don’t know or did not respond). Of these, 27 were able to give some information about the permit name, but only three community forests could be correlated to any of these, and a further three referred to a “private land deed.”¹⁴ This suggests that most chainsaw milled timber is either not coming from a permit area or the operators or community do not make any distinction.

Dimensions

“Any log that is placed in a dimension is pit-sawing. Two by two is a dimension. Two by five is a dimension.” - Othello Teah, Grand Bassa.¹⁵

The domestic market demand for 2 inch (”) planks is based on observations in the timber markets around Monrovia and the 2016 Building Markets survey, which found 68 percent of planks produced were 2” x 10” x 14’ (feet) and suggested that “planks that are larger than this are too heavy to manually carry.”¹⁶ In contrast to the domestic demand, several respondents reported kpokolo sizes greater than 4” thick, up to 12” and 50 cm thick (Table 2).

TABLE 2 Evidence of production of lumber over two inches thick

4” (~100mm)	5” (~125mm)	6” (~150mm)	7” (~175mm)	8”+ (~200mm+)
4” x 4” x 10’ [GP16]	5” x 5” x 8’ [GP14]	6” x 6” x 7’ [GP16]	7.5” x 9” [GP11]	8” x 8” [MN4]
4” x 10” x 9’6” [GP15]	5” x 5” x 9’ ¹⁷	6” x 11” x 7’4” [GP1]		8” x 8” x 5” [GP16]
4” x 12” x 9’ [GP13]	5” x 5” x 10’ [GP16]	6” x 12” x 7’ ¹⁹		12” x 12” [GP3]
4” x 12” x 9’6” [GP15]	5” x 10” x 9’ ¹⁸			50 x 50cm x 7’ ²⁰
4” x 14” x 7’ [GP16]				

Notes:

- Data from survey respondents (e.g., “GP16”), unpublished journalist notes, and published DayLight articles.
- Figures were often mentioned without units, so reference to inches, feet, etc. has been assumed, given they are the units typically used for timber in Liberia. We have not converted the one instance of metric dimensions.
- There is no adequate information on the frequency of any size.
- See Footnote 7 for explanation of codes GP1, etc.
- 3” x 12” was also mentioned as a typical plank dimension for constructing fishing canoes but this has not been included as canoe-making is a traditional occupation.

¹⁴Of the 27 chainsaw operators or community leaders providing information, five referred to community forests: Gba-Zor/Blei (three respondents), Central Morweh (one respondent), and one respondent said “community has permit” and was interviewed 2km from Salayea community forest. One other respondent said “Downen Community Forests deed,” but this does not correlate to a known community forest and no GPS coordinates of the interview were recorded. GPS coordinates were collected for about half (78 out of 150) of the chainsaw operators and community leaders interviewed, but only nine were located inside a permit area, all of whom were in a cluster in Gola Konneh community forest. The question about title deed and/or permit was not included in interviews with Dealers, Monrovia-based plank field Chairs and Monitors, or Checkpoint agents.

¹⁵Harding Giahuy, James. 2022. “Regular Caller’ Turns Illegal Logger.” The DayLight. <https://thedaylight.org/2022/09/29/liberia-regular-caller-turns-illegal-logger/>.

¹⁶Holt, Jennifer. 2017. Liberia: domestic timber value chain analysis. P 24. Building Markets. <https://buildingmarkets.org/liberia-domestic-timber-value-chain-analysis/>.

¹⁷Newa, Mark B. 19 January 2023. “The ‘Kpokolo’ Kingpin: How FDA Created A Serial Illegal Logger.” The DayLight. <https://thedaylight.org/2023/01/19/the-kpokolo-kingpin-how-fda-created-a-serial-illegal-logger/#:~:text=Ganta%20issued%20a-waybill%20for%202021,-pieces%20of%20Kpokolo>.

¹⁸ibid.

¹⁹Harding Giahuy, James. 26 February 2023. “Illegal Loggers Harvest ‘2,300’ Timbers in Gbarpolu Town.” The DayLight. <https://thedaylight.org/2023/02/06/illegal-loggers-harvest-2300-timbers-in-gbarpolu-town/>.

²⁰Newa, Mark B. 19 January 2023. “The ‘Kpokolo’ Kingpin: How FDA Created A Serial Illegal Logger.” The DayLight. <https://thedaylight.org/2023/01/19/the-kpokolo-kingpin-how-fda-created-a-serial-illegal-logger/#:~:text=Ganta%20issued%20a-waybill%20for%202021,-pieces%20of%20Kpokolo>.



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Photographs of timber on trucks or in shipping containers suggest that logs are simply being squared to better fit into a container. The photographs in Figure 1 suggest baulks of timber 15, 25, 30 and 45 inches square (40, 65, 75 and 120 cm).

It is likely, although little clear evidence has been found, that individual foreign customers are specifying dimensions, either as finished products or convenient sizes to resaw:

“We have a tree in the bush called Tali that is what they want.” – [GP1], a clan chief (emphasis added).

There are three mentions of timber being destined for railroad ties, and some of the dimensions above (5” x 10”, 6” x 11”, 6” x 12”, and 7.5” x 9”) could match the standard size for railway ties/sleepers.²¹ One informant said, “where the fighting is taking place in Europe.”²² A second, a town chief, said, “last year some pitsawing group cut kpokolo to build train track” – [CM12]. A third, however, from February 2020, before Russia’s invasion of Ukraine, states: “they have changed the wood type to the one often used by engineers to build train track. He said the wood is cut into 8 by 8 pieces.” – [MN4].

Species

“Ekki is the main work we came... Kpokolo is difficult to produce. It is hard and spoils the chainsaw.” – [GP1]

“[If you are] interested in this Iroko table, you can WhatsApp me on this number.” – Emmanuel Gongor, personal Facebook profile.²³

“If anyone is interested in buying teak wood, just contact me.” – Emmanuel Gongor, personal Facebook profile.²⁴

Table 3 presents the tree species, in relation to blockwood or kpokolo, mentioned either from the survey or in additional investigations. The latest (January 2023) international Free on Board (FoB) values are also given.²⁵ With the exception of Tali, all these species are in the highest-value Category A in Liberia’s schedule of stumpage rates.²⁶

²¹Standard railroad ties are 7” x 9” x 8’6” in North America (see www.trainconductorhq.com/railroad-tie-dimensions/) and 5” x 10” x 8’6” in the UK (https://en.wikipedia.org/wiki/Railroad_tie). Russia and Ukraine use a wider Broad Gauge rail network, which is about 5” (8.5cm) wider compared to elsewhere (see www.globalsecurity.org/military/world/russia/railroad-gauge.htm), so ties 9’ long may be more appropriate. Until recently, Ukraine appeared to be an exporter of timber railroad ties (see for example www.railwaysleepers.com/railway-sleepers/new-railway-sleepers/new-ukrainian-oak-railway-sleepers/).

²²Harding Giahue, James. 18 September 2022. “Woman Runs Illegal Logging Operation.” *The DayLight*. <https://thedaylight.org/2022/09/18/woman-runs-illegal-logging-operation/>.

²³Emmanuel Gangor. Facebook profile: <https://www.facebook.com/emmanuel.gongor>.

²⁴ibid.

²⁵FoB data for ‘B’ grade roundwood, ‘West African logs, Asian market’ from ITTO, 1-15 January 2023; www.itto.int/mis/. Sawn wood values are also published but given the rough sawn nature of kpokolo these have not been referred to. Similarly, values for ‘B’ rather than the highest ‘LM’ grade have been presented. ITTO does not provide prices for dahoma or idigbo, but <https://www.woodchoose.com/wood-database/> suggest they are lower value than ekki, iroko and opepe.

²⁶FDA, 2007, Regulation 107-07 on forest fees, Schedule I; <http://faolex.fao.org/docs/pdf/lbr160086.pdf>.



TABLE 3 Kpokolo species

Common names	Botanical name	FDA Code	Free on Board (FoB) value / m ³	Durability	Risk status
dahoma ²⁷	<i>Piptadeniastrum africanum</i>	PIP		3	Least concern
ekki ²⁸ , azobe	<i>Lophira alata</i>	LOP	US\$294	1	IUCN Red List
framire, baji, emire, idigbo ²⁹	<i>Terminalia ivorensis</i>	TEI		No data	IUCN Red List
iroko, ³⁰ odum, kambala	<i>Chlorophora spp. (regia, excelsa)</i>	CHL	US\$300	1	IUCN Red List
kusia, bilinga, opepe ³¹	<i>Nauclea diderrichii</i>	NAU	US\$294	2	IUCN Red List
lovoa, dibetou	<i>Lovoa trichilioides</i>	LOV	US\$214	3	Least concern
niagon, whismore	<i>Heritiera utilis / Tarrietia utilis</i>	TAR		3	Lesser known
tali, sassawood	<i>Erythrophleum ivorensis</i>	ERY	US\$278	1	Lesser known

Durability 1 is very high, 7 is low. Durability and risk status are proxies for market popularity. Sources: [GP1], [GP2], [GP11].

The Building Markets survey (2016) identified the top four species (in decreasing order by number of planks produced) as framire (*Terminalia ivorensis*), wawa (*Triplochiton scleroxylon*, TRI, durability 5), tetra (*Tetraberlinia tubmaniana*, TET, durability 3) and niangon (*Heritiera utilis*, TAR, durability 3). It went on to say, “Many types of trees frequently harvested by chainsaw millers appear on the endangered species list. These include abura, dahoma, iroko, kosipo, lovoa, niangon, sapele, sipo, and wawa.”³²

While we cannot offer evidence of the relative popularity of different kpokolo species, some shift towards higher-values species can be discerned: tetra and wawa are relatively non-durable, whereas ekki, iroko, and tali are highly durable and highlighted by our respondents, but not the most popular for chainsaw milling in the 2016 survey. This shift towards more valuable species, which will more directly compete with the formal sector, may indicate a greater interest in exporting kpokolo compared to the time of the previous survey (see more on exports on page 11, “What is the scale of kpokolo operations?”)

How long has kpokolo production been happening?

One chainsaw operator interviewed by journalists alongside the survey said, “In 2010, I started Kpokolo business in Kinjor, Grand Cape Mount County” [GP13].³³ Information from other interviewees, however, suggested a more recent start, between 2014 and 2021 [GB6, GP1, GP4, GP11, GP15].

²⁷The Wood Database: Dahoma. <https://www.wood-database.com/dahoma/>.

²⁸The Wood Database: Ekki. <https://www.wood-database.com/ekki/>.

²⁹The Wood Database: Idigbo. <https://www.wood-database.com/idigbo/>.

³⁰The Wood Database: Iroko. <https://www.wood-database.com/iroko/>.

³¹The Wood Database: Opepe. <https://www.wood-database.com/opepe/>.

³²Holt, Jennifer. 2017. Liberia: domestic timber value chain analysis. p.25. Building Markets. <https://buildingmarkets.org/liberia-domestictimber-value-chain-analysis/>.



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Four years of CSO investigations

The case of Tropical Wood Group of Company Liberia Inc. is informative. In March 2019 [MN4], “an informant from Bodey [Lofa county] alleged that some Liberians are working with Tropical Wood Group of Company Liberia Inc. to ship logs/planks in containers through Freeport of Monrovia. People previously involved in the Private Use Permits (PUP) saga were partnering with an Arab businessman.” An investigation was undertaken by the CS-IFM, but it was driven by a desire to ascertain a community’s right to obtain a Community Forestry Management Agreement and it stalled for two reasons: first, the forest appeared to be in a proposed protected area (Wologizi), and second due to the possibility that individuals have legal title to the land. Hence CS-IFM felt reluctant to speak against the wishes of the community unless these other issues were resolved first. Nonetheless, photographs from the field visit show large-dimension timbers.

In November 2019, and reiterated in January 2020, a donor representative in Liberia emailed local grantees: “I just received a whistling on allegedly illegal logging and exports being performed in Bong / Nimba? Seems like some planks are being exported in sealed containers from the area of Gbarnga / Ganta, they have an export permit signed by FDA but the timber comes from areas non assigned for logging. Seems like LVD is performing the container loading verification. This activity has been reportedly happening since last year.” The donor was concerned that it had “no notice of this issue being flagged by the IFM or any other watchdog CSO” and “the role of CS is paramount here. We need active whistle-blowers.”

In February 2020, the informant told MN4 that the company had changed its strategy and location of the business. It had “changed the wood type to the one often used by engineers to build train tracks. He said the wood is cut into 8 by 8 pieces and shaped [cut to fit] into the truck at a new location in Caldwell, Sand field, near the New Redemption Hospital.”

Only in early 2023 did something of the full story come to light, when Emmanuel Gongor’s operations, including his association with Tropical Wood Group of Company Liberia Inc, was reported.³⁴ The DayLight labelled him the “Kpokolo Kingpin.” The DayLight obtained six FDA waybill or other receipts for Emmanuel Gongor or this company, each describing “blockwood,” and three of which it published.³⁵ The oldest of these is dated 28 October 2017.

³³Through this report, survey respondents, unpublished notes from field researchers, and anyone mentioned in these documents have been anonymised (company names have been retained). The codes used only identify the county where the person is based: Bong = BG, Gbarpulo = GP, Grand Bassa = GB, Grand Cape Mount = CM, Greater Monrovia = MN, Lofa = LF, Maryland = ML, Nimba = NB, and Rivercess = RC. Names published in media stories have not been anonymised and instead have hyperlinks to the source.

³⁴Newa, Mark B. 19 January 2023. “The ‘Kpokolo’ Kingpin: How FDA Created A Serial Illegal Logger.” The DayLight. <https://thedaylight.org/2023/01/19/the-kpokolo-kingpin-how-fda-created-a-serial-illegal-logger/#:~:text=Ganta%20issued%20a-waybill%20for%20212,-pieces%20of%20Kpokolo>.

³⁵ibid.



There is no clear basis for the adoption of the word “kpokolo,” and internet sources only provide very recent mentions, the earliest of which is 18 September 2022.³⁶

What is the scale of kpokolo operations?

The legal framework offers a few clauses that hint at the scale of chainsaw milling the country wants to see:³⁷

- Section 5(b) of Regulation 102-22 states “Chainsaw Milling shall always be done in situ.”
- Section 5(c) states permits “shall be issued for a renewable period of one year.”
- Section 8(b) states (in the case of operations in a community forest) “no more than three Chainsaw Milling Permits can be granted within the same year and under the same approved Annual Operations Plan.”
- Section 9(2), also in respect of community forests, states “the Authority shall issue a Chainsaw Milling permit to the CFMB” (Community Forestry Management Body).
- Section 17(a) states “all timber duly produced from Chainsaw Milling under a Chainsaw Milling Permit... are to be marketed, distributed and sold only on the Liberian domestic market.”

While the new regulation is yet to be fully implemented, taken together these clauses indicate that the legal framework never expected chainsaw milling operations to be large, and indeed the draft contract template for this purpose is called a Small Scale Commercial Use Contract.

Production

The Forest Trends survey did not provide sufficient information to comment in depth on the national scale of chainsaw milling for blockwood, but four separate informants in Gbarpolu gave some idea of production.³⁸

[GP1] produces up to 2,200 planks and 900 kpokolo in one month. In the one year they have produced 2,500 kpokolo – [MN3] interviewing a chainsaw operator.

“They took two containers from here before we stopped them.” – [GP11], a clan chief.

“I only cut one container for him... I worked for him in November... He took it last week, just before the Christmas... He took it from here and carried it in town... There were 250 pieces of Kpokolo, 4x12 and 4x10.” – [GP13], a chainsaw operator.

³⁶There were two earlier DayLight stories on this topic. The first, “FDA seizes container trucks loaded with illegal logs”, published on [14 August 2022](#), described containerised timber confiscated at Klay Checkpoint, but did not mention of the timber/log sizes inside. In the second, “Leaked video exposes FDA rangers illegal logging operations”, published on [31 August 2022](#), included a picture of kpokolo but the story does not describe it as such until a follow-up piece on [30 September 2022](#), when referring back to it.

³⁷FDA. 2022. Regulation 102-22 on Chainsaw Milling. www.fda.gov.lr/sites/default/files/documents/Chainsaw%20Milling%20Regulation%20%20Proposal.pdf.

³⁸As only four examples, these do not represent large quantities. For comparison, Building Markets’ 2017 report estimated that on average, a single chainsaw milling operation produces 511 planks (or 23 m³) from 48 trees, and takes approximately 3 months. Forest Trends’ analysis of LICSATDUN data showed an average of 830,00 planks entered the Monrovia market per year between 2018 and 2022 (Figure 3). A shipping container is 33 m³ or 67 m³ depending on its length.

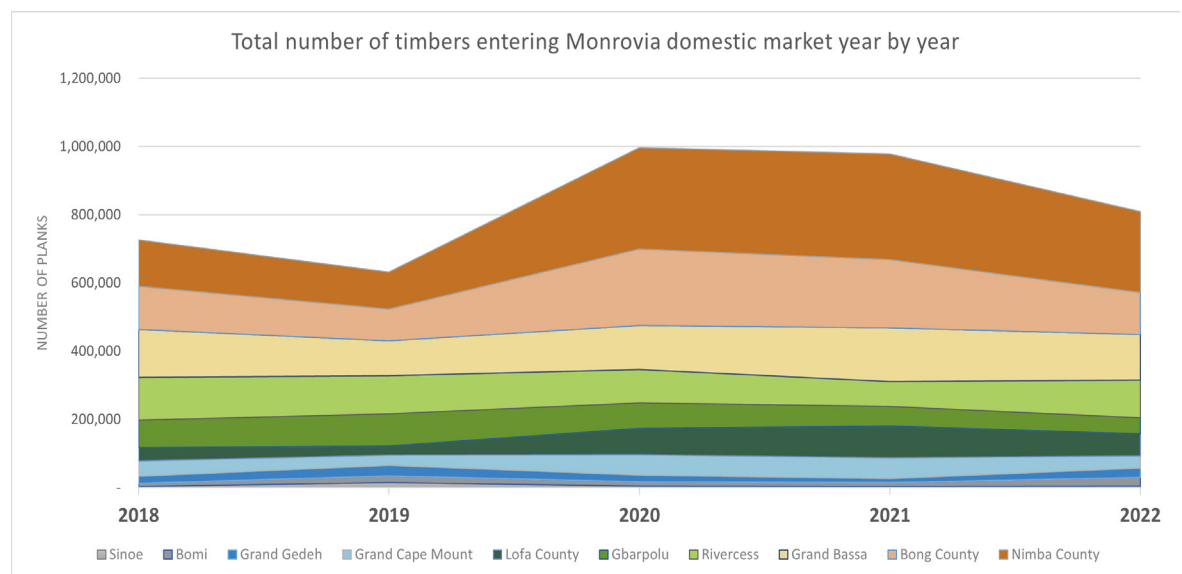


“The first batch of kpokolo we produced was 500 pieces and the next one 1,800,” said [Peter] Vah, who said his duties included finding trees and supervising the harvesting. “Nothing has been sold. Some are in the bush, and others in Monrovia.”³⁹

A decrease in the delivery of planks to Monrovia may indicate a rise in kpokolo and/or exports

LICSATDUN data collected from five checkpoints controlling plank supplies to Monrovia report a 20 percent decrease in trade between 2020 and 2022 (Figure 3). This drop in supply may signal an increase in chainsaw-milled timber, including kpokolo being illegally exported.⁴⁰ In a workshop held in December 2022, both the LICSATDUN and expert resource people commented, “kpokolo is not chainsaw milling.”

FIGURE 3 Number of planks entering Monrovia domestic market year by year, 2018-2022 by County



Involvement of big companies

“They are backed by FDA and community people even though they are not to do it. They have bigger and sophisticated equipment that we don’t have.” – [LF6], owner of a county level dealer business.

³⁹Harding Giahvue, James. 6 February 2023. “Illegal Loggers Harvest ‘2,300’ Timbers in Gbarpolu Town.” The DayLight. <https://thedaylight.org/2023/02/06/illegal-loggers-harvest-2300-timbers-in-gbarpolu-town/>.

⁴⁰LICSATDUN provided data on the number of planks counted at roadside checkpoints in Iron Gate (Gbarnga), Salala (Bong County), Big Joe Town (Buchanan), Owensgrove (Grand Bassa County) and Klay (Bomi County) for each year between 2018 and 22. It does not monitor the transport of planks to other urban areas, and Blackett, Lebbie and Marfo (2009) note “waybills are not required for transporting timber to markets other than Monrovia”; Chainsaw logging in Liberia, p.15; www.academia.edu/17376660/Chainsaw_Logging_in_Liberia_An_Analysis_of_Chainsaw_Logging_Pit_Sawing_in_the_Natural_Forests_of_Liberia_Towards_a_more_Sustainable_Production?auto=download.

⁴¹Of 276 people surveyed, 133 answered “no” to this question, and 56 did not answer and 60 people, the Monrovia plankfield chairpeople, checkpoint officials, and most of the Monrovia plank dealers were not asked this.



Twenty-seven survey respondents said, “yes,” they did think big companies are involved in chainsaw milling, although only one of these – a chainsaw crew manager [GP16] – also offered evidence that his own team cuts blockwood when buyers request the larger sizes.⁴¹ In contrast, the 2016 Building Markets survey made no mention of the involvement of formal sector operators being involved in artisanal logging or chainsaw milling.

Survey work in Nimba and Cape Mount counties found two clusters of respondents commenting about two companies, Akewa and Askom, being involved in kpokolo production. Akewa is an acknowledged operator in the formal sector, previously holding a Timber Sales Contract (TSC) in Grand Bassa from 2010 and two logging permits in community forest: Beyan Poye (Margibi County) since March 2017 and Gola Konneh (Cape Mount) since October 2019. Concerns about Akewa’s performance and social obligations in all three forests have been documented, including by The DayLight in early 2022.⁴²

Akewa now appears to be involved in chainsaw milling in Gola Konneh. A Zonal Chairlady stated Akewa was “not living up to the agreements made between the company and the community. And they are still cutting down the trees in the forest... through an agreement with the community.” [CM4] Others commented, “our business slow down, because community have more interest in working with big company than local pitsawyers” [CM6], and “sawmills ... in the forest” and “big yellow machines” mean local plank dealers suffer “lots of loses and even go out of business.” [CM3]

A representative of the FDA reportedly confirmed with [MN3], a Monrovia-based journalist, that Akewa cuts logs into lumber in the forest, and said it was legal. The remark was apparently on the basis that logs can be sawn using any means, implying it could be legal as long as the timber is registered in LiberTrace.

The way LiberTrace handles sawn timber, however, is not consistent with chainsaw milling, as the technique is too wasteful of wood when cutting a log into planks.⁴³

The second company, Askon, signed a contract with the Gba community in February 2019 for the logging of all merchantable species in the section of the community forest agreed to be handed to ArcelorMittal Liberia (AML) as a Tailings Management Facility.⁴⁴ There is no record of Askon in FDA, Legality Verification Department (LVD), or Liberian Extractives Industries Transparency Initiative (LEITI) reporting.⁴⁵ However, respondents said it was operating in a neighbouring District, Garr-Bain, “between the Ganta-Sanniquellie highway” [NB6] as well in a more remote Buu-Yao District [NB5].

⁴²Harding Giahue, James. 25 January 2022. “Akewa: The Nigerian Company Breaking Liberia’s Logging Laws Unpunished.” The DayLight. <https://thedaylight.org/2022/01/25/akewa-the-nigerian-company-breaking-liberias-logging-laws-unpunished/>.

⁴³LiberTrace handles sawn timber by monitoring the traceability, legality, and taxes just before logs enter in a processing unit through “declaration of raw material batch.” Each processing unit has a yield ratio, normally written on the machine, which, in percentage terms, is the highest volume that could be obtained from processing. This will always be below 100 percent of the volume entered, as whatever happens there will be loss during the processing operation. The finished batch is the raw material batch times the yield of the processing unit. If the finished batch is higher than the expected volume, LiberTrace will flag the entire batch. This is to avoid unregistered logs entering the supply chain without having been declared in the raw material batch.

⁴⁴USAID, 2020, Forest incomes for environmental sustainability (FIFES): FY19 fourth quarter & annual report: October 1, 2018 – September 30, 2019; pp13-14; https://pdf.usaid.gov/pdf_docs/PA00WH9Q.pdf.

⁴⁵We could find no mention of Askon in the most recently available reports from: (i) LEITI, 2022, 13th Report, 2019 – 2020; www.leiti.org.lr/sites/default/files/documents/LEITI%2013th%20Report%20final.pdf. (ii) LVD Monthly Performance Reports, April and May 2022; <https://libertrace.sqs.com/#>. (iii) Liberia-EU FLEGT VPA, Aide-mémoire, Ninth Meeting of the JIC, Monrovia, 21-24 March 2022”; <https://flegtvpafacility.org/wp-content/uploads/2022/05/9-Liberia-JIC-aide-memoire-annexes.pdf>.



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Two respondents [NB12, NB14] described the use of large machinery: “The Turkish company, Askon, is involved in pitsaw operation, using mobile saw referred to as crusher” – [NB12], LICSATDUN monitor & coordinator; and “The company is using mobile saw that clears large portion of bush and trees in seconds” – [NB14], chainsaw operator. Photographs taken by The Daylight include a Woodmizer mobile sawmill and indicate smooth lumber of dimensions too precise to have been milled by a chainsaw (Figure 4).

FIGURE 4 Askon’s milling operations in number, including a Woodmizer mobile mill



Credit: The Daylight / Gerald C. Koinyeneh, September 2022.

Six respondents [NB2, NB3, NB5, NB7, NB12, NB14] associated Askon with kpokolo or blockwood. For example, “there is a big company here that saws blockwood (kpokolo), a huge board-foot dimension that are often shipped abroad.” – [NB5], the owner of a county level dealer business. Six [NB2, NB6, NB8, NB14, NB15, NB18] people described the impact on the established plank millers and traders, for example “the big companies are embarrassing the industry. These companies negotiate with townspeople to deny Liberian wood dealers from doing business with the communities” – [NB2], the owner of a county level dealer business.

In February 2023, the Daylight also published an expose of Raytech International, a Liberian-Indian company operating in Darmo’s Town in Gbarpolu’s Bopolu District since mid-2021.^{46,47} Raytech’s Articles of Incorporation list forestry as its first activity, but the company does not feature in the most recent lists of such companies available from LEITI, the Joint Implementation Committee (JIC), or the Liberia Timber Association, and does not appear to have an internet presence.⁴⁸

⁴⁶Harding Giahvue, James. 6 February 2023. “Illegal Loggers Harvest ‘2,300’ Timbers in Gbarpolu Town.” The DayLight. <https://thedaylight.org/2023/02/06/illegal-loggers-harvest-2300-timbers-in-gbarpolu-town/>.

⁴⁷Although we have information about three companies, Akewa, Askon, and Raytech, we cannot say others are not doing it too.

⁴⁸We could find no mention of Raytech in the most recently available reports from: (i) LEITI, 2022, 13th Report, 2019 – 2020; www.leiti.org.lr/sites/default/files/documents/LEITI%2013th%20Report%20final.pdf. (ii) LVD Monthly Performance Reports, April and May 2022; <https://libertrace.sgs.com/#>. (iii) Liberia-EU FLEGT VPA, Aide-mémoire, Ninth Meeting of the JIC, Monrovia, 21-24 March 2022”; <https://flegtvpafacility.org/wp-content/uploads/2022/05/9-Liberia-JIC-aide-memoire-annexes.pdf>.



The founder of Raytech, Sam Tumosiayah, acknowledged the FDA recently banned kpokolo (see page 20, “Has there been an official response?”) but told The Daylight he and others “were appealing to the FDA to lift the ban... Tumosiayah thinks his kpokolo operation is legal because his business is registered and pays taxes.”⁴⁹ In the same article, Tumosiayah told The Daylight:

“Our business on the market is not going like before. We are catching some difficulties... Some people are cheating and defrauding the Liberian government... but if you have legal documents to do X,Y,Z, the government will say, ‘Yes, this is a Liberian person!’”

Role of foreigners

“Their involvement is affecting us greatly. There are no jobs in the country, and the timber production industry is the only source of income for Liberians.”

“Their involvement is affecting us greatly. There are no jobs in the country, and the timber production industry is the only source of income for Liberians. We are instructed by our union through the FDA not to enumerate aliens into this chainsaw milling industry.” – [NB8], owner of a county level dealer business.

Sixty-seven survey respondents indicated they thought foreigners are involved in chainsaw milling.⁵⁰ When combined with other published or unpublished sources the nationalities named are Chinese, Ghanaians, Guineans, Indians, Ivoirians, Lebanese, Malians, Nigerians, Sierra Leoneans, and Turkish.

Blackett, Lebbie, and Marfo (2009) suggested one percent of workers in the sector were foreign,⁵¹ and the Building Markets survey (2016) noted that “thirty percent of surveyed community members stated that there are chainsaw millers operating in their community’s forest from outside of Liberia,” and mentioned Cote d’Ivoire, Guinea, and Sierra Leone as source countries.⁵² The research team previously interviewed Ghanaian chainsaw operators in 2006, one of whom said law enforcement was more effective at home, forcing him to work at night, whereas in Liberia he was “free.”

In the current survey, 49 of 67 respondents referred to the economic damage they suffer as a result of foreigners but, as the survey focussed on plank production for the domestic market, there is little evidence in the results that allude to the extent to which the presence of foreigners is associated with kpokolo. Only seven respondents allude to kpokolo and the involvement of foreigners. Of these, two referred to Askon (NB12 and NB14, see previous section) and four to an unnamed Nigerian business (NB2, NB5, NB7 and NB8).

⁴⁹Harding Giahue, James. 6 February 2023. “Illegal Loggers Harvest ‘2,300’ Timbers in Gbarpolu Town.” The DayLight. <https://thedaylight.org/2023/02/06/illegal-loggers-harvest-2300-timbers-in-gbarpolu-town/>.

⁵⁰For the chainsaw millers and community leaders this question came after ‘Do you think big companies are involved in the chainsaw milling business?’ and was phrased ‘Are they Liberian or foreign?’. Thus the response was ‘n/a’ for 125 who did not believe companies are involved. Also, the question was not asked of 60 people – the Monrovia plankfield chairpeople, checkpoint officials, and most of the Monrovia plank dealers. Finally amongst the 276 interviewees in total, 13 said ‘no’ and 11 did not answer this question.

⁵¹Blackett, Lebbie and Marfo, 2009, Chainsaw logging in Liberia, p.11; www.academia.edu/17376660/Chainsaw_Logging_in_Liberia_An_Analysis_of_Chainsaw_Logging_Pit_Sawing_in_the_Natural_Forests_of_Liberia_Towards_a_more_Sustainable_Production?auto=download.

⁵²Holt, Jennifer. 2017. Liberia: domestic timber value chain analysis. p.25. Building Markets. <https://buildingmarkets.org/liberia-domestictimber-value-chain-analysis/>.

⁵³Newa, Mark B. 19 January 2023. “The ‘Kpokolo’ Kingpin: How FDA Created A Serial Illegal Logger.” The DayLight. <https://thedaylight.org/2023/01/19/the-kpokolo-kingpin-how-fda-created-a-serial-illegal-logger/#:~:text=Ganta%20issued%20a-waybill%20for%2020212,-pieces%20of%20Kpokolo>.



More information can be discerned from the other sources. For example, one published news item states “Gongor was hired by a Turkish-owned firm called Tropical Wood Group of Companies... Abdulla Aklan [is] the company’s owner... He broke out with his employer and established Tropical Wood Group of Investment.”⁵³

Unpublished journalist notes from a visit to Gbarpolu in late 2022 provide the following connections between foreigners and kpokolo:⁵⁴

“[GP18] from Sawmill ran away from people whom he owed. He is a Sierra Leonean. Most of the Kpokolo people are Sierra Leoneans.” – [GP2], a LICSATDUN member.

“I agreed for [GP1 and GP18] to cut the logs but my questions was, ‘If you cut these logs, what will be our benefit?’ They said the timber were 7.5x9.” – [GP11], a clan chief.

“That time [2010] I was working with Malians. I can say that Malians introduced Kpokolo in Liberia. The man who started it was [ML1].” – [GP13], a chainsaw operator.

“There are some companies from China, India. There are middlemen. It becomes difficult for us to get our money.” – [GP2], a LICSATDUN member.

Evidence of exports of kpokolo wood

“Kpokolo operates with a lot of middlepersons. One person produces the wood, another sells to a broker and then all the way to the exporter, according to [GP15].” – [MN3], a Monrovia-based journalist.

Blackett, Lebbie, and Marfo (2009) highlight “that records show limited or no supply from Grand Gedeh, Grand Kru, Maryland, River Gee and Sinoe counties lending weight to the suspicion that timber from these counties is being transported to Ivory Coast.”⁵⁵ This is consistent with analysis of five years of data from LICSATDUN (2018-2022) that show less than three percent of Monrovia’s supplies are from Grand Gedeh and less than one percent from Sinoe, with zero recorded from these other border counties. Unfortunately, the current survey did not cover Maryland and Sinoe, and other investigations did not report plank or kpokolo exports from these two counties. The 2017 Building Markets report stated “The export of sawn timber is explicitly illicit. Chainsaw millers did not disclose any information related to the export of planks.”⁵⁶

Twelve people responded to this question in our survey and of these, eleven said they believed chainsawn timber was exported, and only one said no.⁵⁷ (The survey asked about ports and other departure points, but not about destination countries.)

⁵⁴This visit was conducted after the research team highlighted kpokolo as an issue during a workshop with LICSATDUN, so these comments are likely to have been prompted by the field researchers increased attention to this phenomenon.

⁵⁵Blackett, Lebbie, and Marfo, 2009, Chainsaw logging in Liberia, p.13; www.academia.edu/17376660/Chainsaw_Logging_in_Liberia_An_Analysis_of_Chainsaw_Logging_Pit_Sawing_in_the_Natural_Forests_of_Liberia_Towards_a_more_Sustainable_Production?auto=download.

⁵⁶Holt, Jennifer. 2017. Liberia: domestic timber value chain analysis. p.25. Building Markets. <https://buildingmarkets.org/liberia-domestictimber-value-chain-analysis/>.

⁵⁷The question was only included in the interviews with chainsaw millers and community leaders, and amongst them 135 are marked “n/a” as they had not answered yes to the previous question: “Do you think big companies are involved in the chainsaw milling business?”



Of the 11 who said chainsawn timber was exported, five mentioned Monrovia Freeport ([CM4], [CM5], [CM6], [NB12] and [NB14]), one Buchanan [GP16], and three Vahun, in Lofa and on the Sierra Leonian border ([LF1], [LF7] and [LF8]).

All those mentioning Monrovia or Buchanan (and one other, who made no reference to any export point) stated shipping containers are used. The three who referred to Vahun stated trucks were used. An unpublished Third Party Monitoring Monthly Report from SGS states “most operators are currently shipping through containers” and observed at least one container leaving for Côte d’Ivoire. It did not specifically reference kpokolo.⁵⁸

Other published or unpublished sources refer to exports of kpokolo dimension timber to Ghana ([MN3], [GB1], [GB2], [GB3], [GB5], and [GB6]).⁵⁹ There is also evidence from a confidential informant conducting research in Côte d’Ivoire that trucks with Liberian plates regularly come to San Pedro with sawn wood, not logs. Reportedly, the prefect in the region has told the police and gendarmerie not to search the trucks and to let them unload at the port. Further, in one online news item The DayLight published a waybill issued to Emmanuel Gongor (Tropical Wood Group of Investment) on 11 May 2022 for 40 “blockwood,” which indicated the destination as Monrovia Freeport.⁶⁰ Alongside this, The DayLight also published a 24 October 2017 packing list for Tropical Wood Group of Companies, the previous company employing Mr. Gongor, for 50cm x 50cm x 7’ timber to be shipped from the Freeport to Hong Kong.

Evidence of communities benefiting?

Both the Blackett, Lebbie, and Marfo (2009) and the Building Markets (2017) reports provide some detail on the variety of ways communities, their traditional leaders and landowners, and local officials benefit financially from chainsaw milling operations. The details offered from the current survey are largely consistent with this: three-quarters of those asked (190 out of 254) said communities expect payment for giving chainsaw millers access to the forest.⁶¹

None of the survey responses concerning community benefits can be linked to kpokolo, but other published or unpublished sources include the following:

*They have built wooden bridges, and town halls and have repaired schools and clinics in forested towns and villages... Townspeople in the areas Gongor works revere him. His name goes beyond the reach of logging companies in that region, many of whom have failed to fulfil their social agreements with communities.*⁶²

“Community agreed to get US\$100 for each container load of timber.” – [GP11], a clan chief.

⁵⁸SGS, 2022, Third Party Monitoring Monthly Report 2022-06 (June); excerpt obtained by The DayLight. SGS are contracted by the Government of Liberia to conduct independent monitoring of the forest sector and report in confidence to the government and donor community.

⁵⁹This visit was conducted after the research team highlighted kpokolo as an issue during a workshop with LICSDATDUN, so these comments are likely to have been prompted by the field researchers increased attention to this phenomenon. Furthermore, it’s not always clear from the notes when kpokolo exports to Ghana are being described, as distinct from three-inch think timber traditionally used for canoe-making.

⁶⁰Newa, Mark B. 19 January 2023. “The ‘Kpokolo’ Kingpin: How FDA Created A Serial Illegal Logger.” The DayLight. <https://thedaylight.org/2023/01/19/the-kpokolo-kingpin-how-fda-created-a-serial-illegal-logger/#:~:text=Ganta%20issued%20a-waybill%20for%20212,-pieces%20of%20Kpokolo>.

⁶¹The Monrovia plankfield chairpersons & LICSDATDUN monitors and FDA & LICSDATDUN checkpoint officials were not asked this question.

⁶²Newa, Mark B. 19 January 2023. “The ‘Kpokolo’ Kingpin: How FDA Created A Serial Illegal Logger.” The DayLight. <https://thedaylight.org/2023/01/19/the-kpokolo-kingpin-how-fda-created-a-serial-illegal-logger/#:~:text=Ganta%20issued%20a-waybill%20for%20212,-pieces%20of%20Kpokolo>.



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*“When you cut in their forest, you pay L\$200 for one piece to the landowner.”
– [GP13], a kpokolo chainsaw operator.*

Sam Tumosiayah, an agent of Raytech, asked chiefs and elders to grant him access to the forest there... In exchange, Tumosiayah... promised the townspeople to repair a major bridge leading in the area among other things. “Then they agreed to give the landowner their tolls directly. Even our town has received tolls,” said Mamadee Harris, a resident of Darmo’s Town, in an interview... Peter Vah, the local manager of Raytech, said the company paid villagers L\$100 for each piece of kpokolo.”⁶³

“The town asked [Raytech] to repair the bridge and it was done.” – [GP10], a town chief.

Evidence of bribes or kpokolo-specific payments

While neither Blackett, Lebbie, and Marfo (2009) nor the Building Markets report (2017) refer to blockwood, both describe unauthorised payments to officials and therefore point to the methods used to corrupt the checkpoints and waybills system devised to control chainsaw milled timber. The 2009 study gives one example of bribery at a checkpoint, to “facilitate unhindered movement” of planks from River Cess through Sinoe and to Monrovia.⁶⁴ The 2017 report states “bribes to police and security personnel at checkpoints were also frequently noted.”⁶⁵ In the current survey, five respondents use the term “gate drop,” which refers to a single payment to avoid any further scrutiny by officials at a checkpoint (such as counting planks to calculate accurate waybill charges). While none of these five make any reference to kpokolo or blockwood, this type of payment suggests illicit timber. One other respondent, [GP16], who did admit his own team cuts blockwood when requested to, also said a L\$ 1,000 (Liberian dollars) gate drop fee is paid at checkpoints.

Other published sources make more direct comments about the relationship with the FDA or other authorities. For example, The DayLight’s description of the Kpokolo Kingpin states a Development Superintendent in Nimba issued him a permit to operate, and:

“Our own percentage to the FDA is different from the normal [pit-sawing].” [The Superintendent] was speaking in reference to the US\$0.60 toll on a plank compared to US\$2 on kpokolo, according to waybills FDA issued him.⁶⁶

⁶³Harding Giahue, James. 6 February 2023. “Illegal Loggers Harvest ‘2,300’ Timbers in Gbarpolu Town.” The DayLight. <https://thedaylight.org/2023/02/06/illegal-loggers-harvest-2300-timbers-in-gbarpolu-town/>.

⁶⁴Blackett, Lebbie, and Marfo. 2009. Chainsaw logging in Liberia, p.30; www.academia.edu/17376660/Chainsaw_Logging_in_Liberia_An_Analysis_of_Chainsaw_Logging_Pit_Sawing_in_the_Natural_Forests_of_Liberia_Towards_a_more_Sustainable_Production?auto=download.

⁶⁵Holt, Jennifer. 2017. Liberia: domestic timber value chain analysis. P 32. Building Markets. <https://buildingmarkets.org/liberia-domestic-timber-value-chain-analysis/>.

⁶⁶Newa, Mark B. 19 January 2023. “The ‘Kpokolo’ Kingpin: How FDA Created A Serial Illegal Logger.” The DayLight. <https://thedaylight.org/2023/01/19/the-kpokolo-kingpin-how-fda-created-a-serial-illegal-logger/#:~:text=Ganta%20issued%20a-waybill%20for%2020212,-pieces%20of%20Kpokolo>.



“The blockwood is preferable because for normal sawing at times, we take 500 pieces of timber to be a truck load, for the blockwood some are just 150-200 pieces.” – Emmanuel Gongor, “Kpokolo Kingpin.”⁶⁷

The earlier study by Blackett, Lebbie, and Marfo (2009) noted that “production of large dimension planks may be encouraged by the FDA charging... per piece..., as sawing planks to the maximum practical dimensions will mean less boards per load, thus minimizing this cost.”⁶⁸ So it is interesting to see from the Kpokolo Kingpin story that the operator did recognise the savings made by the FDA fees being on a per-piece basis, but that the FDA did too, and reportedly adjusted its rate from US\$0.60 to US\$2, in his case. It’s not clear if this adjustment has been made centrally, nor whether it’s been implemented across the country.

Unpublished sources also provide evidence of a positive working relationship with the FDA:

“I have a permit from the county authority to operate in these communities in Nimba County, and we also got one from the FDA because after our work, we make report to them as the last people... the way forward for my operation is that we are in partnership, those that are at the front are the ones that can get the permit from the FDA.” – [NB1], kpokolo businessperson.

Superintendents have been implicated in kpokolo production in other locations too, for example in Gbarpolu:⁶⁹

“When the road was bad, it was very difficult for trucks to come in. Fees were put together, L\$500 per truck. While it was going on, it never went fine with the Superintendent. The Commissioner of Gbarma District, who was collecting the funds, was not remitting them to him. So, immediately, he wrote a letter to stop all trucks from coming into the county... [MN1] was the highest producer of Kpokolo until the Superintendent even got involved in it. The Superintendent said it was illegal but I don’t know how they handled it... The Superintendent doesn’t have the legal power to impose fees on trucks plying the county’s roads but we are businesspeople. Those are the things we are faced with. If we want to fight all the legal thing, we will not get our business going. And one of the best forest you think about now is Gbarpolu, so those are the things we are trying to avoid.” – [GP2], a LICSATDUN member.

“Before they started the work, they went to Bopolu and met the Superintendent. So, the work they are doing here the Superintendent knows about it.” – [GP4], a community member.

⁶⁷ibid.

⁶⁸Note that elsewhere in the report, the authors recommend a fee of US\$3.50 for typical plank sizes as more “realistic;” Blackett, Lebbie, and Marfo, 2009, Chainsaw logging in Liberia, p.15. www.academia.edu/17376660/Chainsaw_Logging_in_Liberia_An_Analysis_of_Chainsaw_Logging_Pit_Sawing_in_the_Natural_Forests_of_Liberia_Towards_a_more_Sustainable_Production?auto=download.

⁶⁹Any payments from chainsaw milling to Superintendents – i.e. anyone other than the FDA, LVD or communities – could be considered a bribe, albeit if these local officials seek to present it as a payment to the community.



Has there been an official response?

In February 2023, The DayLight reported that the FDA had imposed a ban on transporting kpokolo, quoting an email it received from Edward Kamara, FDA’s manager for forest marketing and revenue forecast: “We have ordered all our checkpoint staff members to stop the issuance of waybills for all sawn timbers with a thickness above two inches because this is the dimensional range of thickness that is prone to illegal exportation.”⁷⁰

The DayLight suggested the ban may have been in place since September 2022, coincidentally the same month that The DayLight first started to report on kpokolo. The DayLight confirmed that in November 2022 “at a number of checkpoints in Gbarpolu and Lofa, everyone said the FDA no longer accepts blockwood or kpokolo.” It also collected several respondent comments to this effect:

[GP1] said Kpokolo stopped since October. They used to sell to Chinese buyers.

[GP5]’s buyer has left the country after the FDA banned kpokolo operation.



Seized kpokolo at the Klay checkpoint in Bomi. Credit: James Harding Giahvue / The DayLight, December 2022

Raytech “started the work but certain time they came and said they wood is not going now. They put stop to the work now until next month. That is what we heard.” – [GP10], a town chief, December 2022.

⁷⁰Harding Giahvue, James. 2023. “FDA Bans ‘Kpokolo’ Timbers.” The DayLight. <https://thedaylight.org/2023/02/15/fda-bans-kpokolo-timbers/>.



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“We heard that the government stopped [MN1].” – [GP11], a clan chief, December 2022.

“We are not doing it again. The government put stop to it.” – [GP15], a Kpokolo businessperson, December 2022.

“Right now we have problem... They instructed the police to go after my truck and my truck was offloaded... telling me that there is mandate coming from the FDA that no blockwood milling should be allowed... My wood has been wasting in sun and I am preparing to take issue with the FDA. The wood that was offloaded is around US\$7,000 and when it cracks, the FDA will be responsible... [We may] take the FDA to Circuit Court to know whether it is right. We always pay tax, they issued us waybills and I get hundreds of them. Let me assure you that we always pay huge sum of money to these guys... I am going to take issue with is the FDA agent... who ordered my goods to be arrested. Maybe he was ordered by another person, so, we are going to see who is behind this.” – [NB1], kpokolo businessperson.

Conclusions

While the FDA might be congratulated for suspending the waybills taxation system for kpokolo, a number of concerns remain: first, the FDA took a long to make a formal public announcement to this effect⁷², making it easy to side-step any subsequent accusation that the ban has not been enforced. It may also be genuinely difficult to enforce (or easy to circumvent) given the custom of putting timber in shipping containers, for which subsequent inspection seems to be variable at best. Second, to the extent communities (or at least their elites) are benefitting from kpokolo and other forms of chainsaw milling, there is little incentive to help enforce the ban or report infractions.

The new Chainsaw Milling Regulation is also relevant, even though it makes no distinction between planks and larger dimensions. The Regulation abolishes waybills for chainsaw milled timber and replaces them with a stumpage charge, which is based on the timber volume,⁷¹ indicating that waybills should be on the way out, but this may be subject to the roll-out of the new regulation and the time and phasing of any switch.

While it is understood Liberia’s President Weah has approved the new regulation, the de facto date from which it becomes enforceable remains unclear. For example, section 12(c) of the regulation states that “effective upon the publication of this Regulation, every timber harvested for commercial use under a Chainsaw Milling Permit that is not enrolled in Specialized Chain of Custody System shall be illegal without any exception or explanation.”⁷³

⁷¹Chainsaw Milling; Section 18(a). www.fda.gov.lr/sites/default/files/documents/Chainsaw%20Milling%20Regulation%20%20Proposal.pdf.

⁷²The Ministry of Justice stated at a meeting with the EU in June 2023 (after this report was prepared) “The FDA has issued a ban on blockwood export and established that any blockwood brought to Monrovia for export, should be considered illegal”.



This would suggest a sudden change, whereby the established chainsaw milling operations to date would be illegal as soon as the Ministry of Foreign Affairs publishes the regulation, pending the development of the Specialized Chain of Custody System. Two years is allowed for this, after which the FDA may also decide that chainsaw milled timber may be legally exported.⁷⁴

In conclusion, the threat from an increase in chainsaw milling for “kpokolo” is real – the kpokolo value chain is oriented more for the export market, concealed using containers, and cut to larger, “kpokolo” dimensions than those required by domestic plank markets. Compared to the previous small-scale industry, kpokolo is likely to generate higher profits and therefore attract bigger companies, more mechanisation, and bigger political-business interests. No matter how it is named, the recent “ban” on kpokolo and the like is unlikely to be effective in the face of these forces. At the same time, improvements in the volume of useful timber to come from each tree felled, and the benefits forest communities may get from chainsaw milling businesses, may make this approach more attractive than bigger operations.

Conventional businesses ignore these changes at their peril, while chainsaw millers and wood dealers across Liberia are already feeling competition from the disruptors. LICSATDUN needs to prepare its members for these changes in the structure of the sector and represent them in advocating for sustainable policies that will protect forests, people, and rural economies. The Union has an interest to get on top of the sector to make sure kpokolo is not pushing its members out of business.

⁷³ibid; Section 17(d).



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Methodological limitations

Our initial expectation to base the research on the methodology used in the Building Markets 2016 survey led us to a survey approach and a close working relationship with LICSATDUN. Both of these factors meant that the team did not concentrate from the outset on the kpokolo issue.

The local field researchers were encouraged to go beyond the survey script and make deeper investigations, guided by three research themes:

- The mention of the involvement of big companies
- The mention of export
- Any incidental (as there was no direct survey question on this) suggestion that the sector was becoming more structured, with fewer independent chainsaw crews and more hierarchies with businessmen or politicians at the top.

We also had a question about the size of timbers being chainsaw milled.

This approach had only limited success. Some in-depth interviews were carried out, but there is no overlap between these respondents and those surveyed. The team was also unable to conduct any survey interviews in Sinoe and Maryland, and although investigations were undertaken in these two counties bordering Côte d'Ivoire, there is no strong information on kpokolo.

Furthermore, participants in our December 2022 workshop with LICSATDUN were adamant that kpokolo is “something else” – distinct from chainsaw milling. They were not surprised that very little evidence about it comes out of the survey, and they were reluctant to discuss it, as they felt it wasn't their concern. In a debrief with the field enumerators, there was also a sense that kpokolo is too secret and sensitive to be talked about openly, and it was only discussed in the workshop when the Forest Trends researcher, David Young, brought it up.

Thus, this study has not been able to obtain systematic information on kpokolo from which we can draw conclusions about its scale across Liberia. Nor have we been able to estimate the volume of kpokolo cut or the value generated nation-wide. Further studies, with the co-operation of the FDA, are needed to determine this.



Forest Trends works to conserve forests and other ecosystems through the creation and wide adoption of a broad range of environmental finance, markets and other payment and incentive mechanisms. This brief was released by Forest Trends' Forest Policy, Trade, and Finance program, which seeks to create markets for legal forest products while supporting parallel transformations away from timber and other commodities sourced illegally and unsustainably from forest areas.

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