







3rd of December 2024

Subject: Serious concerns over restrictive measures on environmental civil society organisations in Cameroon

Dear colleagues,

As international NGOs working for the sustainable and inclusive management of forests and wildlife in Cameroon, we are writing to express our deep concern over a shrinking of civic space in the country following the issuing of a circular by the Ministry of Forests and Fauna (MINFOF) that severely restricts the ability of civil society organisations (CSOs) to function independently.

On 13 August 2024, MINFOF issued the circular no. 0184/C/MINFOF/SETAT/SG/DCP/CCOOP setting out the "conditions required to be considered a partner or signatory of a Memorandum of Understanding with the Ministry of Forestry and Wildlife" and "the endorsement procedure for projects/programmes in the sub-sector". The circular sets an increased number of restrictive conditions posed to national and international civil society organisations working on forest and wildlife issues in Cameroon. This has created a sense of urgency to raise concerns expressed by national and international civil society in regards to their rights to independently conduct activities in the forests sector. Cameroon CSOs play a critical watchdog and monitoring role in a country where the forest sector has been historically marked with illegalities, irregularities, human rights violations and corruption. Cameroon's annual rate of forest loss hit its highest level in 2023. From 2001 to 2023, Cameroon lost more than 2 million hectares (ha) of tree cover, equivalent to a 6.5 percent decrease in tree cover since 2000. Illegal logging and forest conversion remain prevalent in Cameroon.

The restrictions introduced by the MINFOF go far beyond a *voluntary* MoU between state and non-state actors – which can enhance coordination – by stating that MINFOF must be involved in the planning of all activities in forest areas, as well as in the management, the publication of results and the evaluation of forest-related programmes. It is perceived as an attempt from the

government to gain increased and potentially illegitimate supervision and control over independent civil society organisations legally operating in the country.

We believe this measure undermines the rights conferred to national and international civil society organisations registered in Cameroon, who already have legal personality to carry out their activities according to the missions they have devolved upon themselves in accordance with laws no. 90/053 of 19 December 1990 relating to freedom of association and no. 99/014 of 24 December 1999 governing CSOs.

By conferring a public institution the right to interfere in non-state structures, the circular essentially amounts to **censorship of a free and independent civil society**, an essential part of the checks and balances for upholding forest governance in the country, particularly so for organisations that may be critical of MINFOF. This is already having a chilling effect, with CSOs remaining silent for fear of not obtaining or not renewing their MoU.

This could also generate practical implications for efforts to protect Cameroon's forests by causing CSOs unnecessary and disproportionate delays and additional costs in launching and implementing projects. Furthermore, we understand this circular is applied by the MINFOF whereas other Ministries, such as the Ministry of Trade, that work on issues related to forests (for example cocoa supply chains) do not require these restrictive measures.

A number of CSOs believe that a MoU or a partnership would be mandatory, since as currently written, the Circular implies that only the organisations who respect new stringent conditions unilaterally set by the MINFOF will receive the endorsement from the government to operate in the country. This generates an additional fear of being censored or silenced, even more so for the ones who have not worked under any MoU or partnership agreements, and yet remain amongst the longest, most active and respected actors in the sector. This also raises further concerns over the overall trend in Cameroon of increasing restrictions on the freedom of expression and association and the right to peaceful assembly, and the need to ensure better protection of human rights defenders, notably in a pre-election period¹.

It is particularly concerning that the circular was published soon after the adoption of the new forest law (Law no. 2024/008 of 24 July 2024). The full and effective participation of national CSOs, Indigenous organisations and other stakeholders is fundamental in scrutinizing the law and developing a fit-for-purpose implementation framework. Cameroonian CSOs are already developing recommendations for this and remain ready and willing to work with MINFOF to address the challenges facing Cameroon's forests, fauna and communities in the 21st century.

At a time when the international community is increasingly recognising the importance of Cameroon's forests to global efforts to address the climate and biodiversity crises, it is crucial

¹ "UN High Commissioner for Human Rights Volker Türk concludes official visit to Cameroon", 7 August 2024.

https://www.ohchr.org/en/statements/2024/08/un-high-commissioner-human-rights-volker-turk-concludes-official-visit-cameroon

that the numerous forest sector support programmes² that are underway or in development uphold the principles of free and full civic participation and the rights of Indigenous Peoples and local communities, and we therefore call on Cameroon's international partners to:

- o call on your government counterparts to repeal this measure immediately and convey your general concerns over the importance of civic space, freedom of expression and association and the rights of local and Indigenous communities;
- o make the withdrawal of the circular a precondition to start or continue bilateral or multilateral initiatives:
- o urge your Cameroonian counterparts to define a clear and participatory process for developing the implementation framework for the new forest and wildlife law.

This letter has been prepared based on our discussions with a range of Cameroon based civil society organisations that are affected by the circular.

We remain at your disposal to discuss these concerns with you during a meeting.

Best regards.

Signatories:

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² Sustainable Agriculture for Forest Ecosystems (SAFE), Central African Forest Initiative (CAFI), the Sustainable Cocoa Initiative, the new DG INTPA Forest/Timber and Cocoa programme, Congo Basin Forest Action (CBFA) Programme, Forest Governance Markets and Climate - Phase 2 (FGMC2), and others.