



Stage in Supply Chain	Lacey Act Component	Applicable Laws	Documents to Check	Notes to Remember
Forest	Legal Right to Harvest	Forest management company / harvesting company	<p>Confirm that the company holds:</p> <ul style="list-style-type: none"> • A trade and property registry • Bank guarantees • A valid licence • Tax Identification Number (NIF) • The company is registered with the National Office of Social Security (CNSS). • Payment receipt of the employer's contributions i.e. tax paid by the company to the local social security insurance for its workers • The company has a professional agreement and/or the company shareholders have obtained the authorizations from the forest administration to set up a forest operation company. 	The company should hold valid registration with the economic, social and forestry authorities.
Forest	Legal Right to Harvest	Forest management company / harvesting company	<p>Confirm that concession holders have in their possession the following:</p> <ul style="list-style-type: none"> • A harvesting licence • A provisional forest management / harvesting / processing agreement • An approved forest management plan or an allocation decree. 	The company should have taken all the steps required to obtain a licence to operate within the time limits required by laws and regulations
Forest	Legal Right to Harvest	Forest management company / harvesting company	<p>Confirm the company has the following documents:</p> <ul style="list-style-type: none"> • Duly approved Annual Operation Plan (PAO) • An operations licence delivered by the regional forestry administration authorities • Authorizations and licences from other administrative authorities. 	The company must hold an annual harvesting licence issued by the forestry administration and other required permits (certaines autorisation pour agir sur le plan local) from local economic authorities.
Forest	Legality of Harvest	Forest management company / harvesting company	<p>Confirm that the company has followed valid planning procedures and:</p> <ul style="list-style-type: none"> • Has an approved forest management plan • An industrialization plan • Approval of the different plans by the relevant forest administration authorities. 	<p>The forestry management must have a management plan that has been prepared in accordance with the rules and standards prescribed by the forest administration.</p> <p>Note: the forest management plan developed by an authorised person or company includes parameters such as annual allowable cut, the cutting cycle, silvicultural treatments, the list of species authorised to be logged and the minimum diameters allowed for harvesting of each species.</p>

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Forest	Legality of Harvest	Forest management company / harvesting company	Stumps of harvested trees are hammer marked or painted according to regulatory requirements	All trees designated for harvesting should be hammer marked and the stumps should bear the same marks as the logs derived from the tree . The hammer for marking trees is specific to each company and is registered by the forestry administration and judiciary authorities.
Forest	Payment of Taxes and Royalties	Forest management company / harvesting company	Confirm tax returns have been signed by the forest administration .	Tax returns on timber production comply with rules and regulations
Forest	Not Applicable	Forest manager / harvesting company	<p>Check that the company maintains or strengthens socioeconomic welfare of local communities/ indigenous people in accordance with the laws and regulations.</p> <p>Seek confirmation that:</p> <ul style="list-style-type: none"> • Compensation is paid where due as a result of damage to community property • Workers hired from local communities / indigenous people are paid in accordance with legal provisions • Financial contributions are paid in a timely manner to local development organizations as may be required under the terms and conditions of contracts • User rights of local communities are recognized and respected 	These are additional requirements for compliance with the Draft EU “Due Diligence Regulation” Logging companies are expected to contribute to the economic development of the area where they operate. Their contribution to local development should be made in financial terms. The amount of the contribution is to be determined within the additional contractual agreements attached to the management plan.
Forest	Not Applicable	Forest manager / harvesting company	<p>Check that the company recognizes legal or customary rights of indigenous / local people in accordance with the laws and regulations.</p> <p>Seek confirmation that:</p> <ul style="list-style-type: none"> • User rights of local communities in the forestry concessions are recognized and respected 	These are additional requirements for compliance with the Draft EU “Due Diligence Regulation”

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Transport	Legality of Possession and Transport	Transporters	Confirm that regulations are respected through use of: <ul style="list-style-type: none"> • Grey card • Numbered plates • Insurance cards 	Lorries and other transport vehicles for forest products have valid registration licence and number. Note: all vehicles should be registered by the Ministry of Transport from which they get plate number and a grey identification card. The plate number should be mentioned in the insurance card.
Transport	Legality of Possession and Transport	Transporters	Confirm that regulations are respected by the company having valid authorisation for exceptional transport .	Transport licences for forest products are valid and up to date. Note: trucks that transport logs and other timber products should obtain an “authorisation for exceptional transport” from the Ministry of transport. Such authorisation should be renewed once a year. Trucks transporting logs are allowed to circulate only between 05:30 and 11:30 a.m. and between 14:00 and 18:30 p.m.
Transport	Legality of Possession and Transport	Transporters	Confirm that all billets are correctly marked.	Billets of timber in forest yards are marked according to the rules in force so that they can be easily traced. The same marks made on the stumps with the registered hammer should be made on each billet from the same tree so as to facilitate its identification during transportation.
Transport	Legality of Possession and Transport	Transporters	Confirm that drivers of log trucks possess a log transportation sheet .	Log transportation documents are completed prior to departure from the harvesting site and are retained during transportation. Note: during transportation, drivers of logging trucks are required to retain a log transportation sheet that gives information allowing logs to be traced to the felling site.
Processing	Legality of Processing	Processors	Confirm that the company has an industrialization plan approved by the Ministry in charge of forestry and forest administration.	Licences related to timber processing plants should be available for inspection from the company.
Processing	Legality of Processing	Processors	Confirm that regulations are respected through evidence of: <ul style="list-style-type: none"> • Timber harvesting records (official harvesting reports from annual coupes) • Log processing reports 	The company keeps evidence that processing quotas have been respected. Note: companies should process at least 75% of the harvested volume in the country.
Processing	Legality of Processing	Processors	Confirm that regulations are respected by evidence of: <ul style="list-style-type: none"> • Quarterly reports of logs received • Annual reports. 	Factory input and output volumes recorded according to official procedures. Note: forest enterprises involved in logging and timber processing should keep records of all logs entering the processing plant, and submit reports to the forest administration (Provincial Inspectorate) quarterly and annually.

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Processing	Payment of Fees and Royalties	Processors	Confirm that the company keeps log entries and product exit registries.	<p>Tax returns on timber processing comply with rules and regulations.</p> <p>The companies are asked to keep registries which record the log entries and the processed product exits in each factory.</p>
Processing	Not Applicable	Processors	<p>Check that the company complies with the laws and regulations on its employees' and workers' rights</p> <p>Seek confirmation that:</p> <ul style="list-style-type: none"> • The company respects the freedom of its workers to participate in labour union activities • The workers' representatives have been appropriately trained to carry out their duties • The employees of the company have access to relevant information contained in the Labour Law • Relations between the company and its employees have been formalized with respect to legal provisions 	<p>These are additional requirements for compliance with the Draft EU "Due Diligence Regulation"</p> <p>The legislation provides for the existence of a committee of representatives for each group of workers equal to or exceeding 10 individuals.</p>
Processing	Not Applicable	Processors	<p>Check that the company complies with the laws and regulations of its employees' and workers' welfare</p> <p>Seek confirmation that:</p> <ul style="list-style-type: none"> • The company workers are paid in compliance with the regulations applicable to their sector of activity • The company complies with all the legal provisions pertaining to the transfer of workers • Sanitary and safety conditions for workers comply with the legislation in force • Working hours applied by the company comply with legal provisions 	<p>These are additional requirements for compliance with the Draft EU "Due Diligence Regulation"</p>
Processing	Not Applicable	Processors	<p>Check that the company complies with the laws and regulations of its employees' and workers' welfare</p> <p>Seek confirmation that:</p> <ul style="list-style-type: none"> • The company workers are paid in compliance with the regulations applicable to their sector of activity • The company complies with all the legal provisions pertaining to the transfer of workers • Sanitary and safety conditions for workers comply with the legislation in force • Working hours applied by the company comply with legal provisions 	<p>These are additional requirements for compliance with the Draft EU "Due Diligence Regulation"</p>

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Export	Legality of Sale and Export	Exporters	Confirm that regulations are respected by evidence of the company's export/import licence.	The company holds an export/import licence. Note: any company involved in the export of timber product should hold an export licence issued by the Ministry in Charge of Commerce and renewable annually.
Export	Legality of Sale and Export	Exporters	Confirm that regulations are respected by evidence of an approved forest products export specification sheet.	The company holds all the required documents for the export/import of timber products according to official regulations. Note: timber products exporting companies should complete a specification sheet detailing all timber products to be exported by species, quality and quantity. The specification sheet should be submitted to the appropriate forestry authority for approval. The approval of a submitted specification sheet is conditional on proof of payment of all taxes.
Export	Legality of Sale and Export	Exporters	Confirm that regulations are respected by evidence of: <ul style="list-style-type: none"> • Annual and quarterly timber harvesting reports • Log exporting records. 	The company respects log export quotas. Note: logging companies should not export more than 25% of the harvested volume.
Export	Legality of Sale and Export	Exporters	Confirm that regulations are respected by evidence of: <ul style="list-style-type: none"> • CITES declaration as appropriate • List of authorised species within the forest management plan. 	All exported timber species are authorised by the appropriate agency and existing regulations. Note: there seems to be no special list of protected timber species at the national level apart from those of the CITES convention (Gabon is a signatory country) and limitations given within each specific forest management plan.
Export	Payment of Fees and Royalties	Exporters	Confirm that all specification sheets have been duly approved by the water and forest administration.	Tax returns on trade in timber and product importation are done in compliance with rules and regulations.

This document is for educational and informational purposes only and is not intended and should not be construed as legal advice. Persons seeking legal advice on compliance with the Lacey Act or any other law, regulation, or requirement should consult with a qualified legal professional.