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Forest sector accountability in Cameroon and Ghana

Exploring the impact of transparency and participation

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Summary

- Initiatives aimed at strengthening governance in the forest sector have improved transparency and the participation of non-state actors in a number of tropical forest countries. However, evidence for their impact on accountability is limited.
- Two case studies in Ghana and one case study in Cameroon suggest that increased transparency and participation have helped to improve accountability of government and the private sector, with some indications that this is having a positive impact on the management of the forest sector.
- The development and implementation of a digital wood-tracking system (WTS) in Ghana has improved the quality and accessibility of information on forest-sector activities, both within government and for non-state actors. This has resulted in better oversight and decision-making by the government, as indicated by improvements in law enforcement.
- Reforms to Ghana's system of Social Responsibility Agreements (SRAs) – a form of contract between logging companies and communities – in parallel with improved transparency with regard to forest-sector revenues has resulted in more equitable processes for negotiating these agreements and better monitoring of their implementation by government.
- In Cameroon, a rigorous approach to independent forest monitoring has enabled civil society organizations (CSOs) to advocate more effectively for enforcement actions. The Standardized System of External Independent Observation (SNOIE) has improved trust between civil society and enforcement officials, with indications that this is improving the latter's response to cases of non-compliance.
- The three case studies in this paper highlight the complexity of the processes that lead to change, which involve multiple actors, pathways and mechanisms. The concept of an 'accountability ecosystem' is a useful one and should be borne in mind by those seeking to develop strategies for reform.
- The case studies also illustrate that change is often incremental, which provides opportunities for learning lessons and for ratchetting up progress. These characteristics mean that strategies aimed at improving accountability should be adaptive and that, even in the most challenging of contexts, limited reforms can have significant impacts in the long-term.
- Building trust between government and civil society is an important factor in all the case studies. The Ghanaian experiences illustrate how better relationships between state and non-state actors have helped to establish more inclusive decision-making processes and improve transparency.
- Both the horizontal and vertical aspects of accountability were important in the case studies. Horizontal accountability mechanisms – i.e., those within government – are often overlooked in attempts to improve governance. Co-ownership of reform processes by state and non-state actors is a critical factor in bringing about durable change, while each can help to drive improvements in the other and strengthen the overall system of accountability.

Introduction

Significant efforts have gone into increasing transparency and the participation of non-state actors in the forest sector over the past 20 years. These actions have been based on the assumption that the provision of information related to the decisions and actions of state authorities, in concert with citizen participation, will lead to more accountable, responsive and effective governance.[1] There is a further implicit assumption that improvements in accountability will help establish a more sustainable forest sector, one that generates positive outcomes for people's livelihoods and the broader economy, the climate and biodiversity.[2]

Transparency and participation have increased in many countries as a result of these efforts.[3] Areas of improvement include the availability and accessibility of laws and policies; the disclosure of data on licensing, harvesting, trade, revenues and law enforcement; the establishment of multi-stakeholder decision-making forums; and cooperation between state and non-state actors in forest monitoring. However, the extent to which these improvements have resulted in greater accountability is less clear. Often the linkages between participation, transparency and accountability are assumed, and the mechanisms and pathways through which impacts may have occurred remain unexplored.

The research outlined in this paper was undertaken in response to this gap in evidence. Drawing on case studies in Ghana and Cameroon, the aim was to investigate whether observed improvements in forest sector transparency and participation have had a positive impact on accountability, and if so, the processes through which this took place.

Defining transparency, participation and accountability

Interpretations of transparency, participation and accountability vary widely, and consequently, these concepts can encompass a range of interventions and approaches.[4] In this section we provide some definitions.

Accountability refers to 'the rights and responsibilities that exist between people and the institutions that affect their lives, including governments, civil society and market actors'.[5] Two key aspects of this relationship are: answerability, this being 'the right to get a response and the obligation to provide one'; and enforceability, that is, 'the capacity to ensure an action is taken, and access to mechanisms for redress when accountability fails'.[6] In other words, it is about creating checks and balances on more powerful actors.

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1 Kosack, S. and Fung, A. (2014), 'Does Transparency Improve Governance?', *Annual Review of Political Science*, 17(1): pp. 65–87, https://doi.org/10.1146/annurev-polisci-032210-144356 (accessed 28 May 2020).
2 See, for example, NYDF Assessment Partners (2019), *Progress on the New York Declaration on Forests: Goal 10 Assessment – Technical Annex to the Five-Year Assessment Report*, https://forestdeclaration.org/images/uploads/resource/2019NYDFGoal10.pdf.
3 Hoare, A. (2020), 'Forest Governance and Deforestation: Exploring the Disparity', https://forestgovernance.chathamhouse.org/publications/forest-governance-and-deforestation-addressing-the-disparity (accessed 28 May 2020).
4 Kosack and Fung (2014), 'Does Transparency Improve Governance?'; Schillemans, T. (2010), 'Redundant Accountability: The Joint Impact Of Horizontal And Vertical Accountability On Autonomous Agencies', *Public Administration Quarterly,* 34(3): pp. 300–37, doi: 10.2307/41288351.
5 Newell, P. and Wheeler, J. (2006), 'Making Accountability Count', *IDS Policy Briefing,* 33(6), https://www.ids.ac.uk/publications/makingaccountability-count/.
6 Ibid.

Mechanisms of accountability can be both vertical and horizontal. The former entails citizens and civil society organizations (CSO) holding their governments to account, for example, through elections and legal cases (political accountability), or through less formal processes of advocacy and protest (social accountability). Horizontal mechanisms are those within government, for example, the roles of auditors, anti-corruption agencies and judiciaries (these encompass political and managerial accountability).[7]

Transparency refers to making information available and accessible to people. As an aspect of governance, transparency is aimed at enabling citizens to hold government officials to account for their decisions and actions, either indirectly through their voting decisions, or directly, through advocacy, engagement or protest. Responsible behaviour of the private sector is also a target of transparency efforts, enabling customer choice (i.e. about which products or services to buy) or advocacy campaigns.

As has been well documented, however, transparency may be necessary for accountability but transparency in isolation cannot achieve accountability.[8] An analysis of transparency interventions that have been successful in prompting a response from the intended target (government or private sector) identified four common elements of these interventions:[9]

1. The information provided is salient and accessible to at least one group of information users.
2. The information causes users to change their decisions and actions.
3. These new actions affect providers [e.g. the government agencies or private sector that are providing a particular service] in ways they find salient and consequential.
4. Providers respond constructively.

Participation in governance refers to the rights and opportunities for citizens to be informed of, consulted on and engaged in policymaking. It is through participation mechanisms that citizens can push for and maintain accountability.[10] Such mechanisms may be more or less inclusive, ranging from information-sharing at the lower end, through to deliberative, consultative or engagement processes with some degree of power-sharing at the upper end.[11] Access to information can enable citizens to participate more effectively through these mechanisms, while the latter can also allow citizens to demand more transparency.

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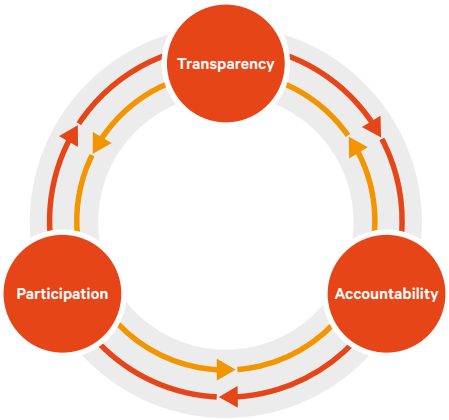
7 Ibid.; Halloran, B. (2017), *Strengthening Accountability Ecosystems: A Discussion Paper*, Transparency and Accountability Initiative, https://www.transparency-initiative.org/archive/wp-content/uploads/2015/11/Strengthening-Accountability-Ecosystems.pdf.
8 Fox, J. (2007), 'The Uncertain Relationship between Transparency and Accountability', *Development in Practice*, 17(4–5): pp. 663–71, https://doi.org/10.1080/09614520701469955; Kosack and Fung (2014), 'Does Transparency Improve Governance?'; Gaventa, J. and McGee, R. (2013), 'The Impact of Transparency and Accountability Initiatives', *Development Policy Review* 31: pp. 3–28, https://doi.org/10.1111/dpr.12017.
9 Fung, A., Graham, M. and Weil, D. (2007), *Full Disclosure: The Perils and Promise of Transparency, New York:* Cambridge University Press, cited in Kosack and Fung (2014), 'Does Transparency Improve Governance?'.
10 Tandon, R. (2002), 'Linking Citizenship, Participation and Accountability: A Perspective from PRIA', *IDS Bulletin* 33(2): pp. i–vi, https://opendocs.ids.ac.uk/opendocs/handle/20.500.12413/8660.
11 OECD (2020), *Innovative Citizen Participation and New Democratic Institutions: Catching the Deliberative Wave*, Paris: OECD, https://www.oecd-ilibrary.org/governance/innovative-citizen-participation-and-new-democratic-institutions_ccb0b123-en.

Thus, transparency and participation are intertwined. Transparency can enable more effective participation and vice versa, and each can help to deliver greater accountability. In turn, accountability can improve access to information and participatory mechanisms, for example, through legal or institutional reforms. Such reforms can be a means to help lock in improvements in transparency and accountability, making these changes more durable. These interactions can result in a positive cycle of change (Figure 1).

Figure 1. The interactions between transparency, participation and accountability



Source: Compiled by the authors.

These three principles all contribute to good governance. The Food and Agriculture Organization (FAO) defines six principles of good forest governance: alongside transparency, participation and accountability, the other three principles it lists are effectiveness, efficiency and fairness/equity.[12] All these principles are interlinked, and better performance in each of the areas will support improvements elsewhere. For example, more effective or efficient institutions will be better placed to make information available or to respond to the demands of civil society. Thus, the various mechanisms and pathways that lead to accountability are best described as a 'network of governance'[13] or an 'accountability ecosystem'.[14]

Methods

Chatham House has undertaken research into forest governance since 2006, investigating how governments and the private sector have responded to the issue of illegal logging. This has included an assessment of the policy and institutional frameworks in nine tropical forest countries using a standard set of questions, of

12 FAO (2011), *Framework for Assessing and Monitoring Forest Governance*, The Program on Forests and FAO, http://www.fao.org/climatechange/27526-0cc61ecc084048c7a9425f64942df70a8.pdf.
13 Gaventa and McGee (2013), 'The Impact of Transparency and Accountability Initiatives'.
14 Halloran (2017), *Strengthening Accountability Ecosystems*.

which a number are related to transparency and accountability.[15] This research, complemented by a review of the literature, was used as the basis for identifying potential countries for more detailed investigation in this paper.

Cameroon and Ghana were selected as the strongest candidates for case studies. This was because in the latest Chatham House assessments, they both scored 'good' for transparency in 2018 and there was some documentary evidence of improvements in accountability.[16] Furthermore, both countries have been engaged in the Forest Law Enforcement, Governance and Trade (FLEGT) Voluntary Partnership Agreement (VPA) process (see Box 1) with the EU since 2007, which has resulted in significant investment in transparency and participation mechanisms. Consequently, there is much interest in the impact of these reform efforts.

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The research in Cameroon and Ghana employed the 'most significant change' evaluation tool.[17] In the initial stages, researchers interviewed members of government, the private sector and civil society in both countries.[18] They were asked to identify examples of changes in accountability that had been driven by transparency improvements. This resulted in the identification of a longlist of potential case studies. A workshop was held in both countries to select case studies for further investigation.[19] The selection criteria were: 1) strength of the links between participation, transparency and accountability; 2) quality and availability of evidence of a change in accountability; 3) likely robustness and sustainability of this change; and, 4) breadth of beneficiaries of the change.

Three case studies were selected: two in Ghana – one on the country's wood-tracking system (WTS)[20] and one on Social Responsibility Agreements (SRAs);[21] and one in Cameroon, on independent forest monitoring.[22] Research into these entailed further interviews to document the processes of change and the compilation of data to provide evidence of the reported changes in transparency and accountability. Primary data collection took place between August and December 2019.

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15 Forest Governance and Legality (n.d.), 'Country Profiles', https://forestgovernance.chathamhouse.org/.
16 Ibid.
17 Davies, R. and Dart, J. (2005), 'The 'most significant change' (MSC) technique – a guide to its use', *Researchgate*, DOI:10.13140/RG.2.1.4305.3606.
18 The number of interviewees is given in the Annex.
19 The number of workshop participants is given in the Annex.
20 Lead researcher for this case study: Mustapha Seidu, Nature & Development Foundation.
21 Lead researcher for this case study: Gene Birikorang.
22 Lead researchers for this case study: Laurence Wete Soh and Justin Kamga, FODER.

Case studies

The forest sector is an important contributor to the economies of Ghana and Cameroon. According to Transparency International, both countries suffer from poor overall governance, with low transparency and high levels of corruption, and there has been little change in this status since 2012.[23] With respect to governance of the forest sector, according to Chatham House research, both countries have a 'fair' overall performance.[24] In Cameroon, although minor improvements have been seen in some areas, including transparency of information and procedures for the allocation of concessions, overall little change has occurred in the past decade. In Ghana, improvements have been seen in its institutional and legal frameworks, while better information and data management practices have resulted in increased transparency.

The processes of forest-sector reform in Ghana and Cameroon have ebbed and flowed as political interest in the sector has similarly changed. Since 2007, forest-governance reforms in both countries have been dominated by the negotiation and implementation of VPAs with the EU (see Box 1).

Box 1. Voluntary Partnership Agreements

VPAs are legally binding trade agreements that are negotiated between the EU and timber-producing countries. They are a key element of the EU's FLEGT Action Plan. A VPA seeks to ensure that timber and timber products imported into the EU from a partner country comply with the laws of that country. During the negotiation of the agreement, the legislation that is to be taken into account in determining legality is decided, and a system is developed for assuring the legality of timber products (a legality assurance system (LAS)), with 'FLEGT licences' issued for products verified as legal and destined for the EU market.[25]

A key feature of the VPAs is the establishment of multi-stakeholder processes for both the negotiation and implementation of these agreements. This has opened up opportunities for participation, by both CSOs and the private sector, to engage in government decision-making processes. Another important feature is the inclusion of provisions on transparency in the agreements, setting out the data and information that each of the parties to the agreement commits to making publicly available.[26]

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23 Transparency International (n.d.), 'Corruption Perceptions Index', https://www.transparency.org/en/cpi (accessed 29 May 2020).
24 Forest Governance and Legality (n.d.), 'Country Profiles: Ghana', www.forestgovernance.chathamhouse.org/countries/ghana; Forest Governance and Legality (n.d.), 'Country Profiles: Cameroon', www.forestgovernance.chathamhouse.org/countries/cameroon.
25 Details of the VPAs can be found here: EU FLEGT Facility (n.d.), 'VPA Unpacked', http://www.vpaunpacked.org/en/vpa-unpacked.
26 Cameroon's VPA includes an annex on transparency that lists the information that will be published by the government; Ghana's VPA is less prescriptive, with Article 20 stating that the 'efforts Ghana has made to be transparent' shall be recorded by the official joint monitoring body. More specific provisions setting out the government's transparency commitments were included in LI 2254 (2017) Section 76, in response to lobbying by civil society: Ministry of Lands and Natural Resources (MLNR) (2017), *LI 2254, Timber resource management and legality licensing regulations*, Regulation 32, Accra: Ministry of Lands and Natural Resources, www.documents.clientearth.org/wp-content/uploads/library/2017-11-03-timber-resource-management-and-legality-licensing-regulations-2017-l.i-ext-en.pdf.

Ghana and Cameroon began negotiating VPAs with the EU in 2007. Ghana signed its agreement in 2009, which came into force the same year.[27] Cameroon signed its agreement in 2010, and this came into force in 2011.[28] The processes established under these agreements have been critically important in facilitating the emergence of transparency systems and in enabling participation, as examined in the case studies.

Each of the three case studies below includes a summary of the change in accountability, followed by a description of the processes of change as reported by interviewees, an analysis of the key features in transparency and participation mechanisms, and the likely durability of the changes seen.

Case study 1. Ghana's wood-tracking system and its impact on enforcement

The change in accountability

Ghana's WTS, overseen by the Forestry Commission, is the main mechanism for managing the country's forest sector. It enables the government to control and supervise the flow of timber through the supply chain, from harvest to consumption or export, and the monitoring of revenue payments. As part of the implementation of Ghana's VPA, significant effort and resources have been put into strengthening the WTS, of which an important aspect has been its digitization.

Through a process of constructive engagement between civil society and government, a new digital WTS was completed in 2019. This system has significantly improved the quality and accessibility of information on forest-sector activities, in particular across government but also for industry and civil society. This has resulted in more effective decision-making and better oversight by government officials. Consequently, illegal practices in the sector are reported to have declined.

Background

A paper-based WTS operated for decades in Ghana. Trees to be felled were identified by the authorities and recorded on a yield map and all subsequent checking of the legality of a log was traced back to this map. The associated estimates of volume to be harvested and all the relevant tax calculations were done manually. This system was not only laborious and time-consuming, it was also prone to errors and fraud. It was unable to detect infractions by timber companies, such as species mislabelling or logging outside the approved yield, and it gave scope for manipulation, due to corruption or bribery, at almost every stage of the supply chain. Thus, the system was not fit for purpose. With poor oversight of the sector, illegal practices went unchecked, and civil society had little trust in the state's control of the forest sector.

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27 European Community and Republic of Ghana (2010), *Voluntary Partnership Agreement between the European Community and the Republic of Ghana on forest law enforcement, governance and trade in timber products into the Community,* Brussels: European Commission, and Accra: Government of Ghana, pp. 3–75, https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1504615396990&uri=CELEX:22010A0319(01).
28 European Union and Republic of Cameroon (2011), *Voluntary Partnership Agreement between the European Union and the Republic of Cameroon on forest law enforcement, governance and trade in timber and derived products to the European Union (FLEGT),* Brussels: European Commission, and Yaounde: Government of Cameroon, pp. 4–125, https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1450341651671&uri=CELEX:22011A0406(02).

The establishment of a robust WTS was a key element of the VPA – the WTS providing the basis for the licensing of legal timber.[29] The development of this system took place over a decade and was completed in 2019.[30] The main feature of the digitized WTS, set out in the VPA, is the incorporation of various datasets from along the supply chain (including yields, harvests, processing and transport volumes and taxes) and the reconciliation of data. Any discrepancies are automatically 'red-flagged' so that these can be checked and either corrected (in the case of minor errors) or investigated through field audits. Following an audit, corrective action requests (CARs) are then issued, either to the company involved or to the head of the relevant Forestry Commission Division, setting out the steps that need to be taken to resolve the discrepancies. Within the Forestry Commission, these can result in issuing warning letters to staff; if an individual receives three such letters, they can be dismissed.

The WTS is also synchronized with the Forestry Commission's accounting system, enabling automatic detection and notification of companies that have outstanding debts for the payment of royalties or taxes; the issuance of export permits is disabled when the amount due reaches a certain threshold.

The WTS is managed by the Timber Validation Department (TVD) within the Forestry Commission. The department is responsible for verifying the data, which involves conducting audits on logging companies and government agencies, including other departments within the Forestry Commission. The TVD is overseen by the Timber Validation Committee – a multi-stakeholder body with ombudsman functions, established to provide the TVD with a degree of independence from the Forestry Commission. It is made up of representatives from across government, including the judiciary, as well as the private sector, traditional authorities and civil society, and is responsible for investigating any complaints related to the operation of the WTS.[31]

The process of increasing transparency and participation

The development of the WTS was established through a multi-stakeholder process, which was critical to ensure that it was robust and credible. The Multi-Stakeholder Implementation Committee (MSIC), established in 2010, is the formal platform for in-country deliberations on the VPA. The role of the MSIC is to oversee progress in implementing the VPA and to report to the Joint Monitoring and Review Mechanism, which entails summits between Ghana and the EU to monitor progress with the agreement.

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29 European Community and the Republic of Ghana (2010), *Voluntary Partnership Agreement between the European Community and the Republic of Ghana.* Annex V of the VPA sets out the features of the WTS, stating 'A wood tracking system (WTS) will enable the establishment of a chain of custody system as well as the monitoring and reporting of compliance against the legal definition'.
30 Forestry Commission Ghana (n.d.), 'The National Wood Tracking System (WTS)', http://fcghana.org/fctvd/index.php/focal-areas/wood-tracking-system.
31 MLNR (2017), *LI 2254, Timber resource management and legality licensing regulations*, Regulation 32. See also: Forestry Commission Ghana (n.d.), 'Timber Validation Committee', http://fcghana.org/fctvd/index.php/timber-validation-committee. The 2017 Regulation specifies that the civil society representative should be from 'non-governmental organisations active in the forest sector nominated by the non-governmental organisations', and the private sector representative should be from 'the timber industry nominated by registered timber associations' (Section 34).

The MSIC provides a platform for constructive engagement of all parties. During the negotiation of the VPA it included representatives from across government – from the ministries of lands and natural resources, finance and trade, the Ghana Revenue Authority (customs division), and the Attorney General's department[32] – as well as the timber industry and civil society.[33] One important dynamic is that the MSIC places an onus on Ghanaian actors to reach a consensus in order to avoid any disagreements being exposed to the 'other side' (i.e. the EU) at the joint VPA summits. This helps to give non-state actors a voice, and during the negotiation phase this enabled civil society to advocate for the establishment of a robust WTS, among other reforms, which they saw as an important tool for improving governance of the sector. A senior representative of the Forestry Commission, who played a key role in the development of the WTS, commented, 'civil society was the strongest ally who strongly pushed for the development of the electronic wood-tracking system'.[34]

Piloting in concert with capacity-building also allowed the public and private sectors to adapt to and accept the system. Thus, the concerns of companies about the feasibility of a digitized system and its impacts on small enterprises were overcome.

The development of the WTS entailed a process of regular consultation and trials, starting with the piloting of software in 2010, followed by further testing, modification and gradual roll-out, until its completion in 2019. The initial contractors engaged to develop a WTS failed to deliver,[35] but this resulted in the subsequent process being opened up to civil society. This more transparent and participatory piloting process helped to establish a more robust system that was adapted to existing business practices and was also able to deal with issues such as electricity blackouts and unreliable internet connectivity, for example. Piloting in concert with capacity-building also allowed the public and private sectors to adapt to and accept the system. Thus, the concerns of companies about the feasibility of a digitized system and its impacts on small enterprises were overcome. Within the Forestry Commission, the identification by the WTS of inconsistencies between log volumes in the field and in processing mills highlighted the need for training of staff (who are responsible for entering data in the system) in species identification and measurement of log volumes. This was reportedly a turning point for

32 All these ministries were engaged during the negotiation phase of the VPA, while in the implementation phase, the MSIC has included just the MLNR and Ghana Customs.
33 Forestry Commission Ghana (n.d.), 'VPA Multi-Stakeholder Implementation Committee (M-SIC)', http://fcghana.org/fctvd/index.php/gorvenance/oversight-body/multi-stakeholder-implementation-committee.
34 Research interview, undertaken in December 2019.
35 EU FLEGT Facility (2012), *Annual Report 2012: Implementing the Ghana-EU Voluntary Partnership Agreement*, http://www.euflegt.efi.int/documents/10180/23025/Annual+Report+2012+-+Implementing+the+Ghana–EU+Voluntary+Partnership+Agreement/26e6f0bb-1fcb-42e1-bae1-93126eabcf4f.

the technical staff of the Forestry Commission in that they fully understood the utility of the WTS, according to a senior manager within the Timber Validation Department.

The process of constructive engagement that was established to implement the VPA – entailing the development of the WTS and the LAS – also helped to overcome the historical mistrust between civil society, industry and the state, which had existed for many years. This improved relationship has led to the Forestry Commission and national CSOs working together to build a public-access portal to the WTS. The aim of the portal is to provide access to official, up-to-date information on permit-holders and exports, to enable scrutiny of the legality of timber by Ghanaians and by international buyers and observers.

How did transparency and participation improvements lead to greater accountability?

By improving the availability and accessibility of data within government, the WTS enables officials to fulfil their role of overseeing forest activities. For example, the digitization of forest survey data enables maps to be generated within hours or days rather than weeks, as had previously been the case; meanwhile, the ability to query the system has enabled staff to have a better understanding of timber operations, and to quickly produce reports. The greater efficiency of these governmental processes has also helped to reduce the time that timber companies need to wait before starting logging operations.

The enforcement response of officials has also improved. This has been partly due to the 'red flag' functionality that enables easy detection of inconsistencies in the data. In addition, the design of the system has reduced opportunities for corruption; all directors of the Forestry Commission and certain managers have supervisory access to the WTS database, which means they can identify the individuals responsible for red-flagged data, and all actions in the database are associated with a named individual, leaving an audit trail. This is backed up by the existence of penalties for staff who engage in misdemeanours. The establishment of the TVD has also helped to ensure the robustness of the system, although the fact that it sits within the Forestry Commission does limit its independence.

These improvements seem to have contributed to a reduction in illegal activities. Official data show that the number of audits of companies has increased over the period 2015–19. During this period, the number of 'corrective action requests' (CARs) applied to companies and to the local forest authority enforcement teams has also increased, but not at the same rate. Thus, the number of CARs per audit has declined since 2016, although whether this is related to increased transparency, participation or accountability will only become apparent with more data.

Table 1. Companies audited and CARs issued, 2015–19

Year	No. of companies audited	No. of CARs issued to:			Average no. of CARS issued per company audited
		Companies	Forest Services Division of Forestry Commission	Total	
2015	41	30	48	78	1.9
2016	38	19	58	77	2.0
2017	54	37	61	98	1.8
2018	186	58	108	166	0.9
2019	164	82	130	212	1.3

Source: TVD, Forestry Commission.

The WTS has reportedly exceeded the expectations of both the Forestry Commission and companies. All interview respondents for this study, including representatives from government, the private sector and CSOs, believed the WTS had resulted in a dramatic reduction in illegal activities by companies. A senior official from a large-scale timber company commented that 'illegal logging by companies has reduced due to the detection of such infractions by the WTS and the exaction of penalties from the defaulting company'. This perception is supported by a senior manager at one of the timber federations in Ghana, who said, 'the WTS has generally improved forest management prescription in yield selection, planning, inspection and volume calculations'. Similarly, a district forest manager stated that 'illegal logging at the forest district has reduced within the period of the introduction of the WTS'.[36]

Long-term impact

The WTS is still quite new and its long-term impact is unknown. The robustness of the system will be put to the test when FLEGT licences start being issued – for example, if timber consignments from influential companies are held up because the system has identified potential breaches in compliance. However, the benefits in efficiency that it provides to both the forest authority and logging companies give hope that the system will be sustained, and that it will continue to enable better compliance, enforcement and governance of the sector.

In summary, the VPA initiated a process in which the government opened up its decision-making processes to civil society and the business sector. Through better participation, the relationship between the different stakeholders has improved dramatically, from initial mistrust to one of partnership. This has served to improve the accountability of government – as reflected in the legal reforms that were

36 Interviews conducted in November and December 2019.

introduced, reflecting the demands of civil society – and in the transparency improvements seen. The WTS has become a key transparency instrument for improving horizontal accountability.

Furthermore, if the public portal for the WTS becomes fully operational, it will be a valuable tool to support vertical accountability through increased scrutiny by civil society and industry. However, the portal is yet to be completed, and the extent of the data that will be published is still being discussed, with civil society advocating for the government to publish all timber permits.

Case study 2. Improved governance of SRAs in Ghana

The change in accountability

In Ghana, SRAs are a form of contract in which logging companies commit to a code of conduct and to making a payment to affected communities for use in social development projects. The payment should equate to not less than 5 per cent of the total amount the company pays the state in stumpage fees and can be either in the form of community infrastructure or cash. SRAs must be negotiated and signed with communities before logging operations can commence.

Since 2016, there has been a marked improvement in transparency regarding the value of payments that SRAs should provide for, and at the same time, training for communities has enabled them to establish more effective and representative negotiation processes with the companies. Furthermore, since SRAs are included within the criteria for legal timber established under the VPA, the Forestry Commission was tasked with establishing a system for monitoring SRA implementation. These reforms have resulted in increased engagement by government agencies in the SRA system as well as improved compliance by the private sector, subsequently the number of agreements negotiated and signed has increased.

Background

The system of SRAs, which was established through a series of legal reforms introduced between 1997 and 2003, is aimed at enabling those communities affected by logging to share the economic benefits generated by this sector.[37] Prior to the establishment of SRAs, the only mechanism for distributing logging revenues at the local level was through the sharing of royalties. These royalties are split between the local government (District Assembly) and the traditional authorities, made up of the chieftaincy group and its constituent chieftaincies (stools). However, these revenues rarely trickle down to the community level,

37 Young, D. (2017), *How much do communities get from logging? Social obligations in the logging sector in Cameroon, Ghana, Liberia and Republic of Congo*, Brussels: Fern, https://loggingoff.info/wp-content/uploads/2018/04/Young2017-HowMuchDoCommunitiesGetFromLoggingFern.pdf; Government of Ghana (1998), *Act 547, Timber Resource Management Act, 1997* (date of assent 17 March 1998), Section 3(3)(e), Accra: Government of Ghana, www.fcghana.org/library_info.php?doc=45&publication:Timber%20Resource%20Management%20Act,%201997%20-%20Act;%20%20547; MLF (1998), *LI 1649 Timber Resources Management Regulations*, 9 November 1998, Accra: Ministry of Lands and Forests, www.fcghana.org/library_info.php?doc=46&publication:L.I.%201649%20-%20Timber%20Resources%20Management%20Regulations,%201998; MLF (2003), *LI 1721 Timber Resources Management (Amendment) Regulations*, 14 February 2003, Accra: Ministry of Lands and Forests, www.fcghana.org/library_info.php?doc=48&publication:L.I.%201721%20Timber%20Resources%20Management%20(Amendment)%20.

and so SRAs were introduced with the aim of providing direct benefits to communities. As stated in the Forestry Commission manual of procedures, 'The Social Responsibility Agreement is a mechanism for ensuring that all Timber Utilisation Contract (TUC) operations are carried out in a socially responsible manner with due respect for all the rights of the land-owning communities'.[38]

The signing of an SRA is a precondition for the award of a logging permit. The role of the Forestry Commission is to consult with communities prior to allocating a TUC, in order to outline key provisions of the agreement, which are set out in a social proposal. The Forestry Commission is then supposed to oversee the negotiations between the logging company and representatives of the affected communities.[39] However, a lack of awareness by all parties regarding the procedures for negotiating agreements, and limited engagement on the part of government officials, meant that even in the recent past SRAs were poorly negotiated and implemented. Government officials did not always fulfil their role of consulting with communities nor did they provide oversight of the subsequent negotiations, not least because of limited operational budgets. Furthermore, the absence of clear structures within communities for undertaking negotiations meant that the process was often captured by the traditional authorities who did not always consult with the wider community or distribute the resulting benefits.[40] Under the guise of 'legal pluralism', whereby statutory and customary laws co-exist and the former recognizes the latter, chiefs were often able to make claims to SRA benefits on the basis that these related to their lands.[41]

There was a lack of understanding as to which communities could benefit from particular SRAs, and little information on the value of these. Companies were at times compelled to pay large extra sums – sometimes double their stumpage fees – to communities to keep the peace.

There was also a lack of understanding as to which communities could benefit from particular SRAs, and little information on the value of these. Companies were at times compelled to pay large extra sums – sometimes double their stumpage fees – to communities to keep the peace.[42] At other times, communities would not see any benefits. A lack of transparency created an uneven basis for negotiation, and consequently SRAs were characterized by inequity.

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38 Forestry Commission Ghana (1998), *Manual of Operations – Sustainable Timber Production On-Reserve, 1998. Instruction Sheet C3.2, Timber Operational Specifications and Social Responsibility Agreements, Section 3.1*, Accra: Forestry Commission, https://www.fcghana.org/assets/file/Publications/Manuals/MOP.pdf.
39 Ibid.
40 Ayine, D. M. (2008), *Social Responsibility Agreements In Ghana's Forestry Sector*, London: International Institute for Environment and Development (IIED); Young, D. (2017), *How much do communities get from logging?*.
41 Ubink, J. M. (2008), *In the Land of The Chiefs: Customary Law, Land Conflicts, and the Role of The State in Peri-urban Ghana*, Doctoral Thesis, Leiden University Press.
42 Birikorang, G., Hansen, C. P. and Treue, T. (2007), *Review of the current taxation system relevant to the forest sector in Ghana*, VLTP Background Paper #1, Fiscal Study, Accra, Ghana: Forestry Commission, www.fcghana.org/vpa/publications/1248295815_VLTP%20BP%231%20Fiscal%20Study.pdf.

The process of increasing transparency and participation

Ghana's VPA reinforced the government's commitment to SRAs, confirming that for timber to be legal, an SRA needed to be signed and implemented.[43] This prompted the Forestry Commission to undertake a number of analyses on SRAs to improve understanding of the challenges linked with their implementation.[44] These highlighted the lack of understanding among all stakeholders of the legal requirements for SRAs, as well as the limited capacity within the Forestry Commission to assist communities with their negotiations. These analyses also drew attention to the absence of transparency at the level of the Forestry Commission. Datasets and documents were largely inaccessible to communities, while there was poor transparency at the community level regarding existing SRA transactions that had been made between companies and community signatories (who were often under the control of traditional authorities).[45]

In response to these findings, the government introduced a series of reforms for the negotiation and implementation of SRAs. These included the development of a monitoring framework, including a template for district forest managers to report monthly on SRA implementation. In addition, the government, through the Resource Management Support Centre (RMSC) of the Forestry Commission, worked with CSOs to develop an SRA compliance checklist for inspection agents from the TVD, who are responsible for monitoring the legal compliance of companies and their products.[46] In 2017, the RMSC revised its guidelines on SRAs to include a requirement that a democratically elected local SRA committee represents the community in negotiations and subsequent implementation.[47] The Forestry Commission also increased administrative support to communities to strengthen adherence to the guidelines, including support for decision-making on the types of community infrastructure that an SRA might fund, and supervision during subsequent construction of this. Workshops and community forums were organized by the Forestry Commission and CSOs to inform communities about the SRA process and to encourage them to create their own institutions for negotiating and implementing SRAs. The Forestry Commission and CSOs also engaged with the traditional authorities to improve their understanding of the legal framework, in particular, to draw a distinction between timber royalties (which they have a right to a share of), and payments through SRAs (which are intended for communities). Furthermore, every local forestry office received a directive from the Forestry Commission saying they would be scrutinized for compliance with the SRA guidelines.

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43 European Union and Republic of Ghana (2009), *Voluntary partnership agreement between the European Community and the Republic of Ghana on forest law enforcement, governance and trade in timber products into the Community*.

44 Fumey-Nassah, V., Atsu, C., Owusu-Ansah, M., Konadu Pokuaa, Y. and Derkyi, M. (2016), *Improving Social Responsibility Agreements in Support of a functional VPA: Baseline Study Report,* Kumasi, Ghana: Resource Management Support Centre [not available online]; Acheampong, B., Ohene-Gyan, A. G. and Asumang-Yeboah, D. (2016), *Report on Implementation of Social Responsibility Agreements: Case Studies in Sefwi Wiawso, Dunkwa, Assin Foso and Jasikan Forest Districts,* Kumasi, Ghana: Resource Management Support Centre [not available online].

45 SRAs are meant to be signed by three community representatives, with chiefs serving as witnesses to the signatures.

46 European Union and Republic of Ghana (2016), *Aide memoire: Eighth meeting of the Joint Monitoring and Review Mechanism*, Accra 10–15 March 2016, Brussels: European Commission, and Accra: Government of Ghana, www.fcghana.org/tvd/index.php/activities/jmrm-edmemoire?download=8:jmrm-mission-8.

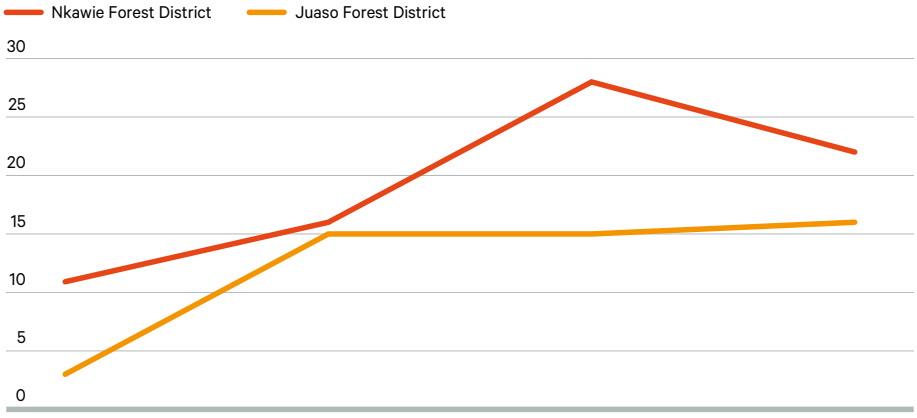
47 Resource Management Support Centre (2017), *Guidelines for Social Responsibility Agreement*, Kumasi: Resource Management Support Centre [not available online].

In parallel with these changes, the Forestry Commission improved the availability of yield and stumpage fee data. In 2015, the RMSC began sharing its data on harvest volumes and SRA estimates with district forest offices. Further improvements in the reliability and dissemination of these data were seen with the implementation of the WTS, which enabled data to be quickly and accurately calculated. Improved dissemination of these data by district forest offices to District Assembly representatives, logging companies and communities provided clarity as to the amount available to the community, establishing a sound basis for the negotiation of SRAs. Moreover, a new regulation was approved in 2017, reconfirming that payment of funds owed through an SRA is a condition for the issuance of a FLEGT licence.[48] The regulation also detailed the government's obligations to disclose information, including the online publication of the required SRA payments, further strengthening transparency around SRA implementation.

How did transparency and participation improvements lead to greater accountability?

Changes in transparency and participation have resulted in marked improvements in SRA implementation, indicated by an upwards trend in the number of SRAs concluded and paid (no data are yet available on the delivery, use and sustainability of community infrastructure) (see Figure 2).

Figure 2. Number of SRAs concluded per year in two forest districts



Source: Data supplied by Nkawie and Juaso forest districts, Forestry Commission.

While some chiefs have challenged the implementation of SRAs in accordance with the new regulations, district forest officers have reported positive changes in the attitude of many chiefs. For example, in Juaso Forest District, communities were included in recent SRA negotiations, whereas for the preceding 20 years these had taken place between the companies and the paramount chief. Similarly, in Nkawie Forest District, the Chiraayaso community has signed an SRA following

48 MLNR (2017), *LI 2254, Timber resource management and legality licensing regulations,* Regulation 76, Accra: Ministry of Lands and Natural Resources, www.documents.clientearth.org/wp-content/uploads/library/2017-11-03-timber-resource-management-and-legality-licensing-regulations-2017-l.i-ext-en.pdf.

27 years during which the traditional authority had dominated the SRA process; and in Bekwai Forest District, chiefs have begun supporting community access to SRA payments.

Improved transparency of forest sector data has been an important factor in bringing about improvements in the implementation of SRAs, through providing a clear basis for negotiations between communities and companies, and in making the capture of SRA payments by traditional authorities more difficult. Clarification of the legal requirements for SRAs regarding the roles, responsibilities and rights of the various parties has also been important, resulting in more transparent and equitable negotiation processes. Civil society played an important role in pushing for these reforms, documenting the lack of implementation and subsequently working with the Forestry Commission to develop guidelines. It also worked closely with communities, building their capacity to enable them to negotiate effectively for their rights. Thus, the Forestry Commission has been fulfilling its role of providing support to communities and overseeing negotiations; and communities have been able to assert their rights to negotiate these agreements, rather than the traditional authorities.

Underlying this process has been the political commitment of the Forestry Commission. This has resulted in an increase in the budget allocation in support of SRA implementation and the establishment of management systems to encourage this, including active monitoring of SRAs. There was reportedly some initial scepticism among officials at the district level that SRA implementation would be improved; however, the national government's commitment to the VPA process has proved to be a significant factor in driving reform.

Long-term impact

As with the previous case study, the VPA has been a critical factor in the changes seen. It opened up space for governance reforms while the desire within the Forestry Commission to begin the licensing of legal timber for export has helped to boost the momentum for these. The resulting legal reforms, training and transparency improvements have all helped to establish a system in which many of the stakeholders have seen benefits – for example, reduced conflict between communities and companies; increased funding for infrastructure within communities; and improved legal compliance (with respect to the requirement to implement SRAs) by companies. The fact that there have been multiple beneficiaries should make these changes more robust. The multidimensional nature of the reforms also makes it less likely that the improvements seen will be short-lived.

As progress has been made with the SRA system, CSOs have continued to work on this issue, seeking to build on the advances made. To improve monitoring of the SRAs, CSOs are currently collaborating with the Forestry Commission to develop a database of SRAs, ultimately to be linked to the WTS public portal (see the previous case study). As of the end of 2019, 11 forest districts out of 36 in the high forest zone, have provided data on SRAs to the RMSC, including information on how communities have decided to use SRA payments. It is

possible that further improvements in transparency will facilitate closer monitoring of SRAs by communities as well as by CSOs. Better monitoring should in turn encourage continued progress with the implementation of these agreements.

Case study 3. Enforcement gains in Cameroon through civil society-led forest monitoring

The change in accountability

In 2015, a group of CSOs that were engaged in independent forest monitoring (IFM) launched the Standardized System of External Independent Observation (*Système normalisé d'observation indépendante externe*; SNOIE). SNOIE provides a rigorous approach for civil society to investigate and report infractions in the forest sector.

This system has enabled CSOs to advocate more effectively for government enforcement as indicated by an increase in responses to reported cases of non-compliance. Thus, this case study focuses on changes in how civil society has sought to strengthen social accountability through more effective participation, rather than on changes in transparency, although the latter has been an important enabling factor.

Background

IFM has been running in Cameroon since 2000. Initially the government and donors contracted one organization at a time to undertake IFM (although national CSOs were also carrying out independent investigations into illegal practices in parallel).[49] Government contracts ceased from 2013, and instead the role was taken on by a number of national CSOs. The importance of IFM was formally recognized in the country's VPA, in which it is listed as one of the sources of information that can be used for auditing the national timber legality assurance system.[50] Nonetheless, IFM was repeatedly criticized and contested by the private sector and by the government; the private sector doubted the neutrality and objectivity of IFM reports, while the government questioned their quality. In fact, there was some basis to these criticisms: non-standardized methods were used by the various CSOs engaged in forest monitoring and reporting was similarly varied.

The civil society response to this predicament, led by the non-governmental organization FODER *(Forêts et Développement Rural)*, was to devise a standardized system, SNOIE. This aims to provide independent, documented evidence in a systematic and consistent way and use this as a basis for demanding government accountability. The theory of change envisaged by the SNOIE assumes that more robust civil society forest monitoring will result in improved engagement with government and stronger advocacy, which in turn will lead to increased transparency and an improved enforcement response by the government. This will strengthen the IFM system, and so maintain the change cycle.

49 IFM was implemented by Global Witness in 2000–04, Resource Extraction Monitoring (REM) in 2005–09, and AGRECO-CEW in 2010–13.
50 Brack, D. and Léger, C. (2013), *A review of independent forest monitoring initiatives and lessons to learn*, Global Witness, London: Global Witness et al., https://loggingoff.info/wp-content/uploads/2013/10/736.pdf.

The process of increasing transparency and participation

The effectiveness of IFM depends on transparency and cooperation between civil society and enforcement officials in Cameroon's Ministry of Forests and Wildlife (MINFOF). Thus, much of the functionality of IFM depends on access to information – for example, on the permits allocated, and logging volumes or harvest areas approved so that the compliance of operators can be checked. Furthermore, it requires the authorities to review the findings of investigations and to respond to these.

The effectiveness of IFM depends on transparency and cooperation between civil society and enforcement officials in Cameroon's Ministry of Forests and Wildlife. Thus, much of the functionality of IFM depends on access to information.

Since the VPA between Cameroon and the EU was signed in 2010, MINFOF has taken steps to improve the availability of information. For example, the ministry now publishes lists of valid logging permits and their geographic distribution,[51] and reports on infractions,[52] although these were last updated in 2014 and 2018, respectively, and the information is not comprehensive. MINFOF also established a website to present the information that is required under the VPA[53] although the site is not regularly updated or complete – for example, no information is provided in the section for the VPA transparency index.[54] Geographical information on logging permits is also made available on the National Forest Atlas (this includes 2020 data),[55] established by MINFOF with the support of the World Resources Institute (WRI). Under their agreement with MINFOF, WRI is able to publish these data on the Global Forest Watch platform[56] and Open Timber Portal,[57] two transparency instruments that make locally and independently sourced data and information available to a global audience.

These improvements in transparency have taken place in parallel with the development of SNOIE. Established in 2015, the SNOIE system operates on the basis of a clear definition of roles and responsibilities among participating CSOs. These include: observers, usually trained community members who provide 'alerts' about infractions; verifiers, who are charged with identifying and documenting

51 Ministère des Forêts, de la Faune (n.d.), 'Liste des titres valides', http://www.minfof.cm/index.php/liste-des-titres-valides.
52 Ministère des Forêts, de la Faune (n.d.), 'Sommier des infractions', http://www.minfof.cm/index.php/sommier-des-infractions.
53 Accord de Partenariat Volontaire (n.d.), http://apvcameroun.com/.
54 Accord de Partenariat Volontaire (n.d.), 'Annexe VII', http://apvcameroun.com/index.php/annexes/annexe-vii/information-rendue-publique.
55 Atlas forestier de la République du Cameroun (n.d.), https://cmr.forest-atlas.org/.
56 Global Forest Watch (n.d.), https://www.globalforestwatch.org/.
57 World Resources Institute (n.d.), 'Open Timber Portal', https://opentimberportal.org/operators?lat=3.16&lng=12.44&zoom=8.22. This platform was established as a tool to incentivize the production and trade in legal timber through the provision of information; it compiles official data on concession boundaries and registered timber producers, with documents uploaded by these producers, and observations by third-party forest monitors.

priority cases, and then disseminating their reports; and advocacy organizations that are responsible for follow-up campaigns. The clear definition of roles was devised to avoid potential conflicts of interest, for example, between the need for establishing a good working relationship with government to investigate cases, and the need to advocate for the government to take action.

SNOIE has been designed and implemented according to the quality standards of ISO 9001:2015,[58] and obtained its certificate in 2018. The ISO 9001 certificate is a general quality-assurance standard applicable to businesses and other systems, but this is the first time that a civil society monitoring system has been certified.[59] It provides a guarantee of the quality of IFM, from the observation and verification processes, through to reporting and advocacy, and so addresses the criticisms raised about the lack of methodological standards for IFM. Critical to achieving this was the provision of training for member CSOs, which included data-gathering techniques, requirements for documenting observations and the quality management system.

Once drafted, IFM reports are subjected to validation by a multi-stakeholder Technical and Ethics Assessment Committee (*Comité d'évaluation technique et éthique des rapports d'observation*), as a way of building trust in the objectivity and verifiability of IFM reports. This committee is made up of six experts; one from the private sector, one from MINFOF (from the enforcement unit), one forester, one researcher and two legal experts. For a meeting to be held, it requires at least four of these six experts to be present.

After validation by the assessment committee, the observation reports are then disseminated to the government minister and copied to relevant MINFOF officials at the regional or departmental level. Between 15 days and one month later, a letter is sent by FODER (as the coordinator of SNOIE) to those officials responsible for taking action to find out how they have responded to the report. The IFM report, along with the official response, are then made public by emailing them to a distribution list (which includes national and international enforcement agencies and CSOs) and by posting it on the Cameroonian website for IFM[60] and on WRI's Open Timber Portal.[61] Key target audiences for this outreach are the competent authorities within the EU that are responsible for enforcing the European Union Timber Regulation, as well as certification bodies and timber traders. Advocacy campaigns are also implemented, aimed at ensuring that MINFOF carries out enforcement actions in response to the findings documented in the IFM reports.

58 ISO (2015), 'ISO 9001:2015: Quality management systems – Requirements', www.iso.org/standard/62085.html.
59 Centre for International Development and Training (CIDT) (2020), *Advances in Independent Forest Monitoring are bringing change to the forests of the Congo Basin*, Citizen Voices for Change (CV4C) Impact Stories, Wolverhampton, UK: CIDT, University of Wolverhampton, https://cidt.org.uk/wp-content/uploads/2020/04/CV4C-ImpactNewsletter-March2020.pdf.
60 Coordination de l'OIE (2019), 'Rapports de mission', www.oiecameroun.org/index.php/rapports-de-mission.
61 World Resources Institute (n.d.), 'Open Timber Portal'.

How did transparency and participation improvements lead to greater accountability?

There are some indications of better enforcement by government as a result of the improved system for IFM, although the evidence for this is not extensive. An analysis of FODER's internal tracking matrix shows that a higher proportion of IFM reports have prompted government action since SNOIE was first put in place in 2015 (Table 2).

Table 2. Number of IFM reports that prompted a government response

Time period	No. of reports transmitted	No. of responses	Response rate
2013–14	8	2	25%
2015–16	23	23	100%
2017–19	54	43	80%

Source: FODER.

The responses ranged from enforcement missions to imposing financial and administrative sanctions, including the seizure and auction of timber and the suspension of permits. However, there are not sufficient data available to determine whether there has been any change in the types or levels of sanctions being applied (either tougher or less stringent), or in the extent of illegal activities. According to FODER, the perception of SNOIE members, however, is that enforcement has improved and that this has also occurred more widely across the sector, and is not just limited to infractions reported under the SNOIE system.

FODER attributes the government's increased responsiveness to the improved quality of monitoring reports since 2013. More broadly, the improved professionalism of civil society has also boosted levels of trust among state officials in their work, resulting in improved cooperation.[62] This has facilitated the work of enforcement agents, who have increasingly come to recognize the network of CSOs as a valuable source of intelligence. This has been backed up by the advocacy work of SNOIE, which has helped to maintain pressure on the government for action.

Long-term impact

Through stronger transparency and more effective participation, there are some indications that Cameroon's civil society-led independent monitoring system, SNOIE, has contributed to improved enforcement. However, although the response of the government to civil society reports has improved, enforcement remains very weak.[63] Furthermore, previous eras of IFM in Cameroon would suggest

62 Mbzibain, A. and Ongolo, S. (2019), 'Complementarity, rivalry and substitution in the governance of forests: Learning from independent forest monitoring system in Cameroon', *Forest Policy and Economics,* 109, https://doi.org/10.1016/j.forpol.2019.101981.
63 Coordination de l'OIE (2019), 'Note de position : Efficacité du Contrôle forestier', https://oiecameroun.org/images/documents/Notes/Note_de_position_C-OI_Controle_Forestier_082019_FR.pdf.

that the sustainability of these changes in enforcement is fragile.[64] Continued advocacy from national CSOs will be important in shoring up the improvements seen, as will pressure from international buyers and donors. However, more systemic reforms will also be needed, including strengthened mechanisms for horizontal accountability.

Conclusions

The three case studies have provided some indications of positive links between participation, transparency and accountability, and of reduced illegality in the forest sector. However, it is difficult to attribute these changes to any particular process because of their multi-faceted nature with a number of interacting mechanisms, actors and pathways. This complexity has numerous implications that should be considered by those seeking to enhance accountability.

Firstly, steps towards greater accountability are often incremental, allowing for an iterative approach to reform. One advantage of this is that it allows for stakeholders to accept and adapt to new systems, as was apparent in the development of Ghana's WTS, for example. It also provides opportunities to change approaches based on lessons learned and to adapt to any new opportunities that may arise. This can also enable progress to be ratcheted up, the implication of which is that it is worth pursuing small improvements even in very opaque and challenging contexts. For example, the case studies highlight the effectiveness of cooperative relationships between civil society and the state in improving accountability, but these relationships were developed over time. In Ghana, consultation processes for the implementation of the VPA, including those on the WTS, provided a means of building trust between government and civil society, which led to more inclusive processes with increased sharing of decision-making. In Cameroon, improvements in participation and transparency are at an earlier stage; time will tell whether the increased engagement of the government with CSOs will result in further improvements and increased accountability. This is not to discount the importance of more antagonistic relationships – civil society advocacy has also played an important part in maintaining pressure on the Cameroonian and Ghanaian governments to fulfil their duties.

Secondly, both the horizontal and vertical aspects of accountability are important. Those seeking to improve governance often overlook the horizontal aspects of accountability. However, both of the case studies from Ghana highlight the importance of this aspect of accountability – the WTS that strengthened systems to reduce opportunities for corruption within government and SRA reforms that enabled improved oversight of government officials. The example of Ghana's WTS also illustrates that horizontal and vertical accountability can work in concert; thus, pressure from CSOs helped to ensure that a robust system for timber-tracking was put in place, which in turn enabled better governmental oversight.

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64 Brack, D. and Léger, C. (2013), *Exploring credibility gaps in Voluntary Partnership Agreements: A review of independent monitoring initiatives and lessons to learn*, Global Witness, London: Global Witness, https://cdn.globalwitness.org/archive/files/library/im-vpasfinalweb_en.pdf.

To ignore the horizontal aspects of accountability would risk missing opportunities for reform and more robust change. A further risk of neglecting horizontal accountability is that government stakeholders are excluded from reform processes, and so their needs and priorities are not considered in any resulting infrastructure. This can lead to a lack of ownership over the reform process, which may subsequently be undermined or never properly implemented. Thus, co-ownership by both state and non-state actors is a critical factor in bringing about durable change.

Linked to the previous point, there are often multiple accountability relationships, involving different stakeholders that operate at different levels, and where interests may not align. The case of Ghana's SRAs illustrates this, as the stakeholders include the Forestry Commission, District Assemblies, timber companies, CSOs, community members and traditional authorities. A good understanding of the different actors and their interests is needed to design effective interventions.

Thirdly, capacity-building is important, both for those demanding accountability and for those being held to account. In Cameroon, increasing the capacity of CSOs through training and grants has been at the core of efforts to improve government accountability. In Ghana, training of government officials in parallel with the development of the WTS enabled them to make full use of the new system and so fulfil their expected roles; in the case of SRA reform, capacity-building of government officials played a similar role in improving their oversight of the implementation of these agreements, while training of communities enabled them to negotiate more effectively with industry and to demand accountability from government.

Finally, it is worth reiterating the complexity of the processes of change, which is clearly conveyed by the concept of an accountability ecosystem.[65] This complexity needs to be borne in mind when planning interventions. The interlinked nature of the different mechanisms and processes means that they can reinforce each other and provide checks against the reversal of any improvements made. Therefore, pursuing a range of interventions that help to support multiple pathways of change, as distinct from a series of one-off or discrete interventions, is more likely to bring about systemic change.

65 Halloran (2017), *Strengthening Accountability Ecosystems*.

Appendix. Interviewees and workshop participants

Ghana

Research stage	Government		Private sector		Civil society		Traditional authorities/ communities		Total
	Male	Female	Male	Female	Male	Female	Male	Female	
First stage interviews	11	–	2	–	2	–	–	–	15
Workshop participants	3	–	1	–	1	–	–	–	5
Second stage interviews	13	–	3	–	1	–	6	–	23

Cameroon

Research stage	Government		Private sector		Civil society		International organization		Total
	Male	Female	Male	Female	Male	Female	Male	Female	
First stage interviews	4	1	3	–	4	2	2	–	16
Workshop participants	–	–	–	–	4	–	–	2	6
Second stage interviews	1	–	1	–	2	–	–	–	4

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Cover image: Aerial photography of Rainforest in Dzanga National Park at triangle of Democratic Republic of the Congo, Cameroon and Central African Republic on 13 March 2015.
Photo credit: Michael Gottschalk/Getty Images

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