

# THE DICTATOR'S DOOR

From Crimes in Equatorial  
Guinea's Forests to Home  
Depot's Customers

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## EXECUTIVE SUMMARY

This report presents the Environmental Investigation Agency (EIA)'s investigative findings that connect forest crimes in Equatorial Guinea and opaque Asian processing hubs with millions of doors sold to United States (US) consumers via more than 750 Home Depot stores located in 29 states, contradicting Home Depot's own policy and in apparent violation of the Lacey Act.

Over the past seven years, EIA has investigated some of the most egregious forest crimes in the Congo Basin and their associated supply chains. EIA's Toxic Trade report, released in 2019, exposed the direct import of illegal okoume (*Aucoumea klaineana*) timber into the US from the Republic of Congo and Gabon. Building on our previous research, the current report investigates crimes in Equatorial Guinea's forests and the indirect import of okoume into the US via China. EIA's findings suggest that Home Depot, the world's largest home improvement chain, and Jeld-Wen, the self-declared largest door and window manufacturer in the world, have violated the US Lacey Act for years by importing and buying Equatoguinean illegal timber and failing to conduct proper due care. EIA conservatively estimates that from 2017 to 2022 at least 1.2 million doors sold to US consumers have a very high likelihood of containing illegal okoume wood harvested in Equatorial Guinea. These doors, available in more than 750 Home Depot stores across the country as of April 2023, are the product of a supply chain with roots in the Equatorial Guinean dictatorship, one of the most oppressive and corrupt regimes in the world, ranking close to Afghanistan and

North Korea in Transparency International's Corruption Perception Index. EIA's investigators were informed that "Teodorin" Nguema Obiang – son of the president, former Minister of Forests, and current Vice President – reportedly collects a bribe for each cubic meter of timber exported from Equatorial Guinea, amounting to an average of US \$24.6 million per year from 2015 to 2021 on okoume exported to China alone.

The okoume-faced door supply chain begins in Equatorial Guinea - soon to become the only country exporting okoume logs to China due to bans on log exports in Republic of Congo and Gabon - where okoume trees are logged and exported under a system of bribery and corruption connected to Vice President "Teodorin" Nguema Obiang. Teodorin has been prosecuted in both the US and France for laundering millions of dollars from Equatorial Guinea to purchase cars, yachts, and multi-million-dollar homes, despite a reported annual salary of around US \$100,000. The fourth-richest African country based on Gross Domestic Product (GDP) per capita, Equatorial Guinea has been repeatedly ranked by Transparency International as one of the most corrupt

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countries in the world, and nearly 80 percent of the population lives under the poverty line.

Equatorial Guinea has passed a series of forestry laws and bans over the past 10 years that explicitly aim to promote sustainable forest management, and launched a National REDD+ Investment Plan in July 2020 in order to reduce emissions from deforestation and forest degradation and promote conservation, sustainable management of forests, and enhancement of forest carbon stocks. However, our conversations with major logging operators throughout Equatorial Guinea, including the local subsidiaries of the Wan Peng group and the Rimbunan Hijau group (both of these groups have reportedly been involved in forest crimes and corruption on multiple occasions) paint a different picture. Individuals described to EIA investigators routine defiance of forest regulations (concession limits, harvest under minimum allowed diameter) and government officials that are not only complicit but directly responsible for requiring payment of bribes and punishing operators that do not participate in the corrupt scheme.

The okoume logs are exported to China - despite a roundwood export ban in Equatorial Guinea that was in effect from January 2008 to October 2020 - where they are processed and turned into thin veneers. Equatorial Guinea provided more than 3.4 million tons of okoume logs worth nearly US \$750 million from 2014 to 2021, which represents 50 percent of the okoume logs imported by China by weight during that period (with the vast majority of the remaining imports coming from the Republic of Congo). While the US has passed the 2008 Lacey Act amendments, and several other countries have similar laws that prohibit the import of illegally harvested timber, China currently has no such legislation in effect. Once in China, the logs enter processing and veneer manufacturing supply chains so opaque that companies are often unable to trace the origin of their timber - the concession or country where the trees were originally harvested - from import to the exported product.

The okoume veneers are then manufactured into door skins, either in China, Malaysia, or Thailand, before being imported into the US by Jeld-Wen. Conversations with Jeld-Wen's top door skin suppliers confirm that the origins of the okoume logs are unclear, and that by the time they receive the veneers, it is impossible to verify the declared origins due to the opacity of China's processing supply chain. EIA investigators received collaborating information from a senior sourcing manager at Jeld-Wen. One of Jeld-Wen's suppliers also told EIA investigators that, as they fill out the "Lacey Declaration" (Plant Product Declaration PPQ Form 505) that Jeld-Wen submits to US authorities, they declare all the door skins they export to Jeld-Wen as made of okoume harvested in the Republic of Congo despite the fact that they are incapable of tracing the okoume they used back to the specific country of harvest. Misdeclaring the country of harvest of a timber product imported into the US is a Lacey Act violation.

To complete the products, Jeld-Wen applies the imported okoume door skins onto hollow pine and cardboard frames, and then sells the okoume-faced doors to Home Depot who distributes it across the US to millions of

customers. Home Depot's Wood Sourcing Policy claims to only source wood from the Congo Basin certified by the Forest Stewardship Council (FSC), however, according to EIA's research, no valid FSC certified okoume forests exist in either Equatorial Guinea or the Republic of Congo, which provide the vast majority of okoume logs exported to China for processing into door skins.

Given Equatorial Guinea has provided half of the okoume logs imported by China, that a large portion of okoume logs coming from the Republic of Congo into China are at high risk of being illegal (see EIA's Toxic Trade report), and that logs are untraceable once imported, there is an extremely high risk that for almost a decade Jeld-Wen and Home Depot have routinely imported and bought illegal timber in violation of the Lacey Act. EIA's investigation also concluded that both companies have apparently failed to uphold the principle of due care as set out in *United States v. Lumber Liquidators Holding, Inc.* more than 8 years ago. Jeld-Wen and Home Depot's apparent lack of due care is particularly concerning, given that any company using okoume should have been aware of significant risks of illegality after 2019 when EIA released a detailed expose, the Toxic Trade report, about the illegalities associated with the logging, trade, and export of okoume from the Congo Basin to the US.

## EIA recommends:

- **Home Depot:** a) immediately remove all okoume-faced doors from its shelves and stocks; b) urgently review and revise its wood purchasing policy in order to include unbroken traceability to the point of harvest for all wood products; c) make information about the origin of wood products easily accessible to customers;
- **Jeld-Wen:** suspend the import and manufacture of okoume-faced door skins until the company has developed and implemented a compliance plan at least as thorough and detailed as the one Lumber Liquidators accepted in its guilty plea;
- **US Department of Justice:** investigate Jeld-Wen and other companies importing and selling products containing okoume, to determine if the Lacey Act is being violated, and, if so, prosecute those responsible;
- **US Animal and Plant Health Inspection Service:** a) adopt and implement a robust plan to monitor and investigate Lacey Act compliance, using available data and technology to improve timely analysis of high-risk imports; b) radically improve the information available to the public regarding Lacey Act Declarations;
- **Government of China:** adopt regulations to implement the amended Article 65 of the national forest code, clarifying its application to imported timber;
- **International shipping lines, including Maersk and CMA-CGM:** stop their engagement in the corruption-enabled export of timber from Equatorial Guinea and put the necessary due diligence mechanisms in place to respect national log export bans.