



FOREST POLICY, TRADE, AND FINANCE INITIATIVE
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TIMBER, SANCTIONS, AND CONFLICT: MYANMAR'S FOREST SECTOR SINCE THE COUP

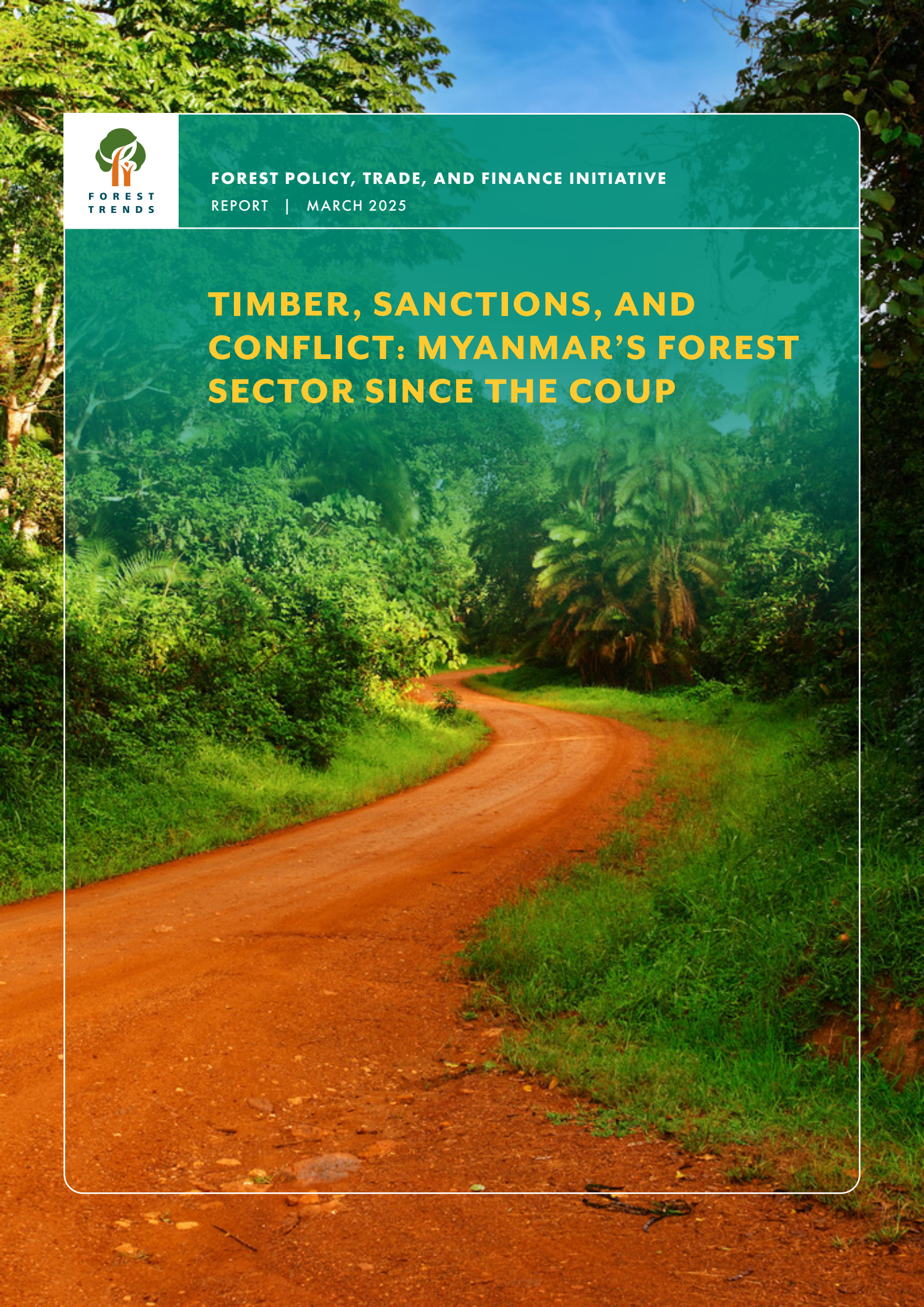




Table of Contents

Executive Summary	3
1 Background	6
2 Forest Products Trade	7
2.1 Limitations of official trade data.....	8
3 Current Forest Management in Myanmar	9
3.1 The junta's control over the forest sector is limited.....	9
3.2 National Unity Government (NUG) response.....	11
3.3 Timber auctions.....	11
4 The Impact of International Sanctions	12
4.1 MTE sanctions.....	12
4.2 Additional sanctions.....	13
4.3 National enforcement of international sanctions.....	13
4.3.1 European Union (EU).....	13
4.3.2 Germany.....	13
4.3.3 Netherlands.....	14
4.3.4 United Kingdom (UK).....	14
4.3.5 United States (US).....	14
4.4 Credibility of claims of sanction exemptions.....	15
5 War Crimes	16
6 Conclusion	17
7 Recommendations	18
Annexes	
Annex 1: Reporting from Myanmar.....	18
Annex 2: Reporting outside of Myanmar.....	19
Annex 3: Confiscations.....	19
Works Cited	22

Executive Summary

Within a few months of the February 2021 coup d'état against the newly re-elected Union Government of Myanmar (UGoM), the United States, United Kingdom, European Union, Switzerland, and Canada imposed targeted sanctions on Myanmar's military leadership and associated businesses. These sanctions were further expanded over the years to include measures against the state-owned enterprises (SOEs) managing the mining, oil and gas, and timber sectors, which were key sources of revenue for the military regime, the state-owned Myanmar Foreign Trade Bank (MFTB), and the military conglomerates that run the major ports in Yangon.

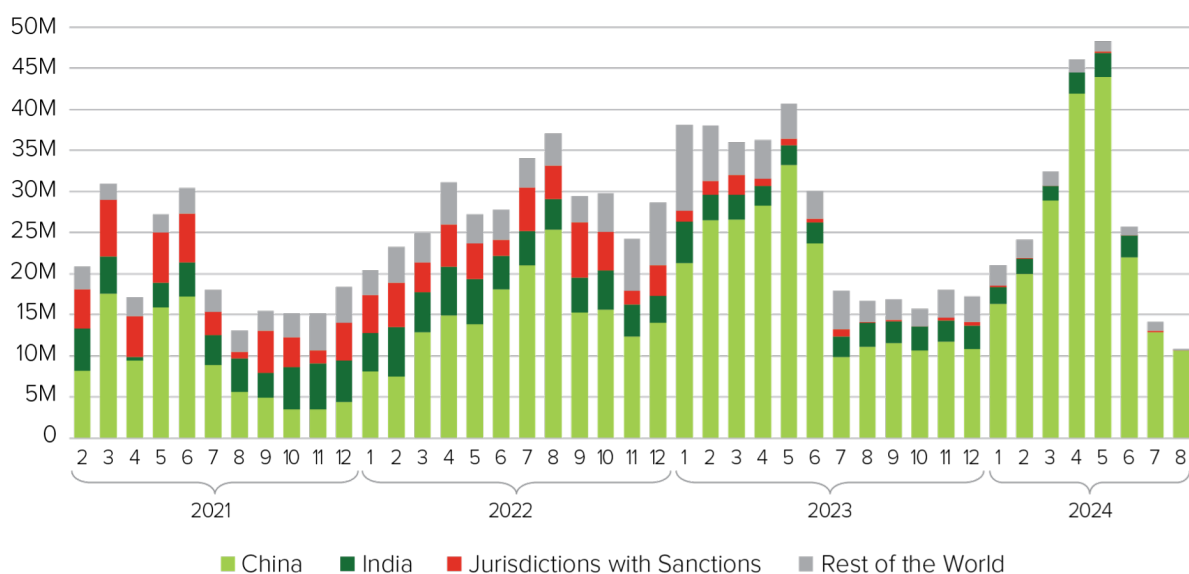
Since 2021, Forest Trends has published regular updates on the status of Myanmar's forest sector and the impact of these sanctions. Post coup, data have become increasingly difficult to obtain. It is clear the sanctions have hurt the military junta's ability to financially benefit from the forest sector and continue to fund the armed conflict. Their control over the forest sector is waning. The military junta is more vulnerable than before, opening opportunities to pressure them for a peaceful transition to federal democracy in Myanmar.

However, there is still a risk that the trade continues, particularly by circumventing sanctions through indirect imports from countries such as China and India – some of which may be linked to organized crime or the war crime of pillage, defined as the trade in stolen property, including natural resources, during armed conflict.

This latest Forest Trends research finds that:

- 1. Global imports of Myanmar's forest products¹ have exceeded US\$1.27 billion since the 2021 coup,** with monthly imports reaching US\$40 million in May 2023. While trade has generally declined since then, China and India maintain strong import levels, demonstrating a shift in trading patterns since the sanctions were implemented (Figure 1).

Figure 1 | Monthly imports of Myanmar forest products (US\$ million)²



Source: UN Comtrade, Export Genius (India, Bangladesh, Turkey, Vietnam, Mexico, Argentina, Russia, and Sri Lanka), India Customs (plywood and related products), and Chinese Customs (Chinese imports for 2024). HTSC 44.

¹ All products in the Harmonized Tariff Schedule 44 (Wood and Other Wood Products; Charcoal).

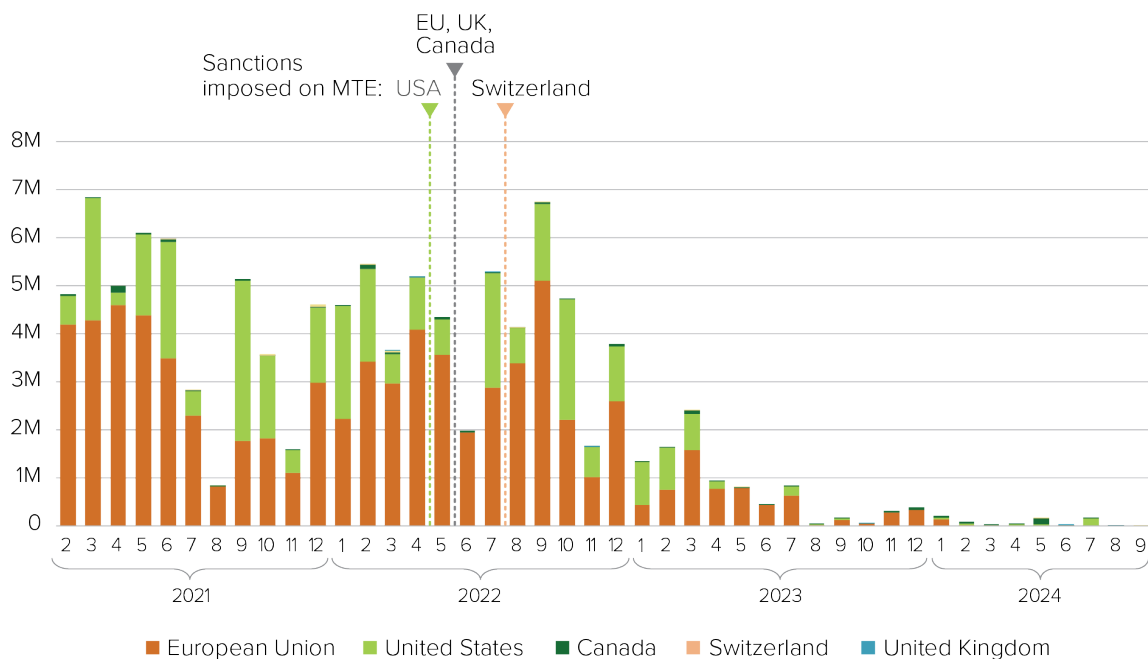
² As reported by importing countries. Most recent data may be incomplete as individual countries may lag in their reporting. A significant shadow trade also exists through smuggling and unofficial channels. For example, official customs data in many countries reveal higher import volumes than Myanmar's reported exports, indicating widespread unreported trade.



- 2. Since the coup, sanctioning jurisdictions (US, Canada, EU, UK, and Switzerland)³ have shown a stark decline in direct imports from Myanmar, but it is likely that indirect trade through other countries continues.** Direct trade to the sanctioning jurisdictions dropped from 25 percent of reported trade in 2022 to just three percent in 2023, with virtually no trade by 2024 (Figure 2). However, there are concerns about products being re-exported through non-sanctioning countries, particularly China and India, to circumvent these trade restrictions.

The EU, previously the largest direct trader among sanctioning jurisdictions, reported over US\$73 million in direct imports since the coup, while the US reported US\$34 million. Both reported almost no direct trade in the last year. Prior to this drop, the number of American traders had already effectively dropped to two: East Teak Fine Hardwoods and J. Gibson Mcllvain Co. Inc, which collectively accounted for more than 80 percent of US imports. Many importing companies stated that their shipments were sourced from private traders who had obtained the timber from the Myanmar Timber Enterprise (MTE)⁴ before sanctions were implemented.

Figure 2 | Monthly imports of forest products from Myanmar



Source: UN Comtrade. HTSC 44.

- 3. China has emerged as the dominant player in Myanmar's forest products trade, and trade routes have shifted to overland border areas where transnational criminal organizations are likely involved.** China is responsible for over half of all reported imports since the coup, but by 2024 had increased its share to 88 percent of global imports as other countries reduced or ceased trading altogether.

³ US (since April 21, 2021), Canada (since May 14, 2021), EU and UK (since June 1, 2021), and Switzerland (since July 1, 2021).

⁴ Many of Myanmar's SOEs are officially responsible for the management and trade of the country's natural resources.

Trade routes into China have shifted from traditional ports in Yangon to overland border crossing into Yunnan Province, the latter now responsible for three quarters of forest-products trade with China (as reported by Chinese Customs). Given the lack of junta control of the border region, it is likely that resistance and other non-state actors, some of whom operate as transnational criminal organizations, are profiting from this trade (more than US\$580 million since the coup).

- 4. The impact of Western sanctions targeting the MTE and the MFTB has been significant.** The reduction in demand for timber from the MTE led to a 30 percent price increase in the secondary timber market in Yangon. Private traders, who weren't directly sanctioned, benefited from this situation by capitalizing on the scarcity created by MTE sanctions.

The financial sanctions, particularly on Myanmar's state-owned banks like the MFTB, have choked the country's international transactions. Banks in Singapore, a key financial hub for Myanmar, report not only closing timber traders' accounts but also denying the MTE access to international cash transfers, thus limiting the MTE's ability to engage in global trade. Despite these restrictions, the MTE continues to demand payments in US dollars, underscoring the junta's need for hard currency.

- 5. The junta's control over Myanmar's forest territories is diminishing,** especially along its borders, which are vital for trade. Many of these forested areas are now under the control of ethnic armed resistance organizations (EROs). For example, the Sagaing Region, which accounted for two thirds of the MTE's production before the coup, is now largely outside of the junta's control. In addition, the loss of border control deprives the junta of revenues from duties, trade fees, and taxes.
- 6. Given the apparent vulnerability of the junta, maintaining pressure through the effective sanction regimes will be critical to achieving a peaceful transition back to democratic control of Myanmar.** The international community is urged to provide further support for opposition to the junta, especially authorities in ERO territories managing land and forests, civil society organizations (CSOs) working for better land and forest governance, and the National Unity Government (NUG) in exile.
- 7. Importers, especially in sanctioning jurisdictions, must also exercise heightened due diligence.** While most importers in sanctioning jurisdictions have responded by curtailing direct imports from Myanmar, they must continue to ensure that they do not buy illicit timber from Myanmar re-exported through other less discriminating countries.

Importers in sanctioning jurisdictions face multiple regulatory risks, including violations of sanctions against state-owned enterprises (including the MTE and MFTB) and the military conglomerates that run the major ports in Yangon, even if the shipments have been re-exported. Importers are in further jeopardy of violating other laws like the EU Timber Regulation, Australia's Illegal Logging Prohibition Act, Article 65 of the Chinese Forest law, or Vietnam's Timber Legality Assurance System (TLAS) – all of which prohibit the trade of illegally sourced wood products. More seriously, traders worldwide may be perpetrating the war crime of pillage through involvement in illegal timber trade linked to armed conflict.



1 Background

Forest Trends' assessment of Myanmar's forest sector (2021), published just days before the military coup, focused on the impact of the country's reform measures aimed at addressing illegal logging and associated illicit trade. The report revealed systemic issues of unsustainable logging practices and significant revenue losses. Harvests had long exceeded the official annual allowable cut (AAC), but with substantial logging unreported by the government, the situation was much worse than official statistics suggested.

Mismanagement and corruption led to government losses of at least US\$1 billion per year. In response to these governance failures, the country's then government, led by the National League for Democracy (NLD), undertook many reforms. Reforms included a one-year logging moratorium (which continues in Bago Region until 2026) and export bans on confiscated timber and logs from land conversion (i.e., from forests cleared for agriculture and other uses) and areas of armed conflict.⁵ Importantly, the MTE was at that point required to transfer all profits to the central Treasury rather than retaining them in "Other Accounts" (a system through which SOEs across the natural resources sector had previously kept approximately US\$12.5 billion off budget, with evidence suggesting the MTE had retained over US\$911 million more than legally permitted between 2014 and 2018).⁶

In the four years since the coup, however, it is not clear how many of these reforms have been overturned. What is clear is that the coup leaders aimed to reverse a decade of these economic reforms. The United States Institute of Peace (USIP) Myanmar Study Group (2022) notes:

"From the outset of the coup regime, it was clear that Min Aung Hlaing intended to wipe out every achievement of elected government over the previous ten years, whether initiated by the NLD or by the military-dominated Thein Sein administration...Many observers believe that along with political motivations, economic interests were a key driver for the coup. Senior officers were concerned, they argue, that the military was about to be pushed more rapidly out of lucrative economic activity."

Prior to the coup, Myanmar had begun to explore transparency initiatives within the forest sector. The government was an active participant in the Extractive Industries Transparency Initiative (EITI),⁷ with companies and government agencies obliged to report all revenue received from the forestry sector.⁸ However, immediately following the coup, the international EITI Secretariat in a board decision (2024) suspended (and has now delisted) Myanmar, while the junta (led by the military, the Sit-tat⁹) and its State Administration Council

⁵ MONREC Notification 1765/2016 and MONREC Notification 61/2017, respectively.

⁶ Previous Forest Trends reports in 2019 and 2022 detail how, since 2012, SOEs had been permitted to keep 55 percent of profits. In fact, between 2014 and 2018, the MTE reportedly kept at least a third more than legally permitted (over US\$911 million in profit). Equally troubling, the Deputy Minister of Planning and Finance admitted in 2018 that the SOE Other Accounts are "accounts in name and there is no actual money deposited in them." Where the missing billions of dollars went has not been made public.

⁷ The Myanmar EITI (MEITI) website (myanmareiti.org/en/publication-category/meiti-reports) has been taken offline. Some data are still available at the main EITI site: <https://eiti.org/countries/myanmar>.

⁸ Forest Trends (2018 and 2019, respectively) reviewed the implications of the first four MEITI forestry reports, covering fiscal years 2014 and 2015 (FY14 and FY15) and FY16 and FY17.

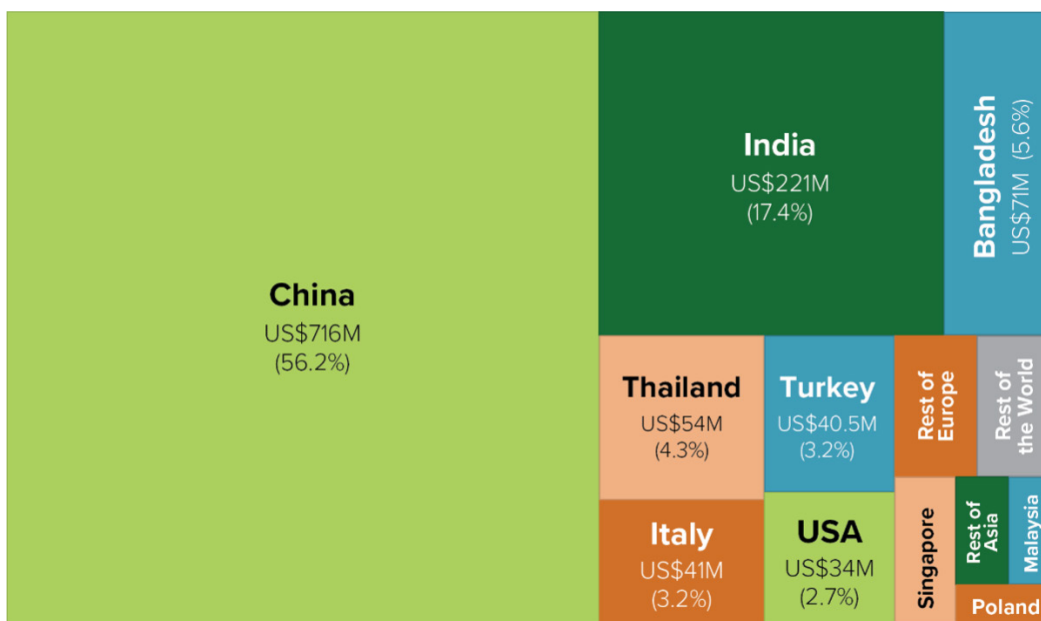
⁹ The more neutral Sit-tat (meaning "military") is increasingly becoming the common way to refer to the Myanmar military rather than Tatmadaw, because the latter includes the honorific "Royal," which connotes "glorious." For a broader explanation, see: <https://www.irrawaddy.com/opinion/guest-column/please-dont-call-myanmar-military-tatmadaw.html>.

(SAC) have reverted to a lack of transparency common under previous military dictatorships.¹⁰ Post-coup, with the Ministry of Commerce suspending trade data publication, the MTE halting publication of monthly tender results, analysts must now rely primarily on reporting by international authorities and importing countries' data to ascertain the state of play in the forestry sector of Myanmar.¹¹

2 Forest Products Trade

Myanmar's forest product exports¹² have continued to be active, with global importers reporting trade exceeding US\$1.27 billion since the coup (Figures 1, 2, and 3), peaking in 2023. The trade dynamics reveal a clear geographic concentration, with China accounting for more than US\$700 million in imports since the coup.¹³ India stands as the second largest importer, reporting 20 percent of trade (over US\$220 million) since the coup.

Figure 3 | Imports of forest products from Myanmar, February 2020 – July 2024 (US\$ million)



Source: UN Comtrade; HSTC 44; Chinese Customs for 2024; India Customs for "plywood and related products"; and Export Genius for India, Bangladesh, Turkey, Vietnam, Mexico, Argentina, Russia, and Sri Lanka.

¹⁰ "No timber trade data available: As the Ministry of Commerce suspended the publication of trade data and the MTE stopped uploading the results of monthly tenders, reliable statistics are hard to come by" (ITTO 2024).

¹¹ Panjiva shipment data from Export Genius has been provided by the NGO C4ADS (www.c4ads.org).

¹² Products under the Harmonized Tariff Schedule Code (HTSC) 44.

¹³ The recent drop in trade could be a result of a lag in reporting by China.



Company-level data are not available for Chinese traders, but some insights are possible for Indian trade. The trade to India is not dominated by a small number of companies. Instead, the largest importer comprised just nine percent of the reported trade. Of the 428 unique company names that reportedly imported Myanmar timber into India,¹⁴ the top five (by value) were: Saudagar Enterprise of Tamil Nadu (nine percent of reported imports); Aashima Imp. & Exp. Private Ltd. of Delhi (seven percent); Woodstock Global of Delhi (four percent), Hillwood Imp. & Exp. Private Ltd. of Kerala (two percent); and Friends Timber Private Ltd. of Maharashtra (two percent).¹⁵

In contrast with China and India, reported trade with sanctioning jurisdictions has dropped precipitously (Figures 1 and 2). As these countries have stopped importing, trade into China has grown from about half of all reported trade from Myanmar to more than 88 percent.

2.1 | Limitations of official trade data

The officially reported trade likely significantly understates the true volume of Myanmar's forest product exports, as they do not include smuggling, especially across land borders, and misreporting due to transfer pricing for tax evasion purposes. This discrepancy is evidenced by a stark 72-percent gap between importer-reported trade versus Myanmar's declared exports for sawnwood, plywood, and veneer in the 18 months following the coup (through July 22, 2021) (see Annex 2).

While the full scale of this illicit trade is difficult to quantify, and the distribution of revenue between the junta and other actors remains unclear, reporting disparities point to systemic issues of not just under-reporting by the junta, but also widespread corruption that has allowed smuggling, tax evasion, illicit trade, and general mismanagement of the forestry sector.

¹⁴ Although there were 428 unique company names in the Export Genius database (based on Panjiva shipment-level reporting) for 2021-2024 HSTC 44, many names were similar and so it is most likely that there were at most 327 importing companies.

¹⁵ Panjiva shipment data from Export Genius provided by C4ADS.

3

Current Forest Management in Myanmar

As discussed in Forest Trends' (2022) report, one year after the coup, the junta banned the export of "large sized sawn timber (baulks)," and in April 2022, the MTE banned timber harvesting for one year. While the ban was not renewed, the MTE never published a detailed Annual Harvesting Plan (AHP) or other reporting to assess the ban's impact. The only production reports on the MTE (2025) website are for 5,000 hoppus tons and 20,000 hoppus tons of teak, about 9,000 and 36,000 m³, respectively, in 2023 from Shan State.

3.1 | The junta's control over the forest sector is limited.

Attempts to control timber production have likely been undermined by the junta's loss of territorial control, particularly in the crucial Sagaing Region. Where the Sit-Tat and its allies cannot maintain territorial control, it is unlikely that they can offer sufficient security to allow industrial logging and timber transport.

The areas where the junta has lost control form a crescent along Myanmar's borders with China, India, and to the Bay of Bengal, all regions that traditionally include significant forest territories (Figure 3). The Sagaing Region (now largely outside junta control) is particularly notable, as it previously generated about two thirds of the MTE's production.

The junta itself admits it does not have territorial control across most of the Sagaing Region, and the security situation is precarious for both logging operations or any potential forest monitoring or enforcement operations. UN data show that Sagaing accounts for nearly half of Myanmar's internally displaced persons and more than half of civilian structures destroyed by military action. This security situation has impacted other industries, as demonstrated by the shutdown of major Chinese-operated copper mines in the region, initially due to civil disobedience strikes and later because of armed resistance group activities.¹⁶

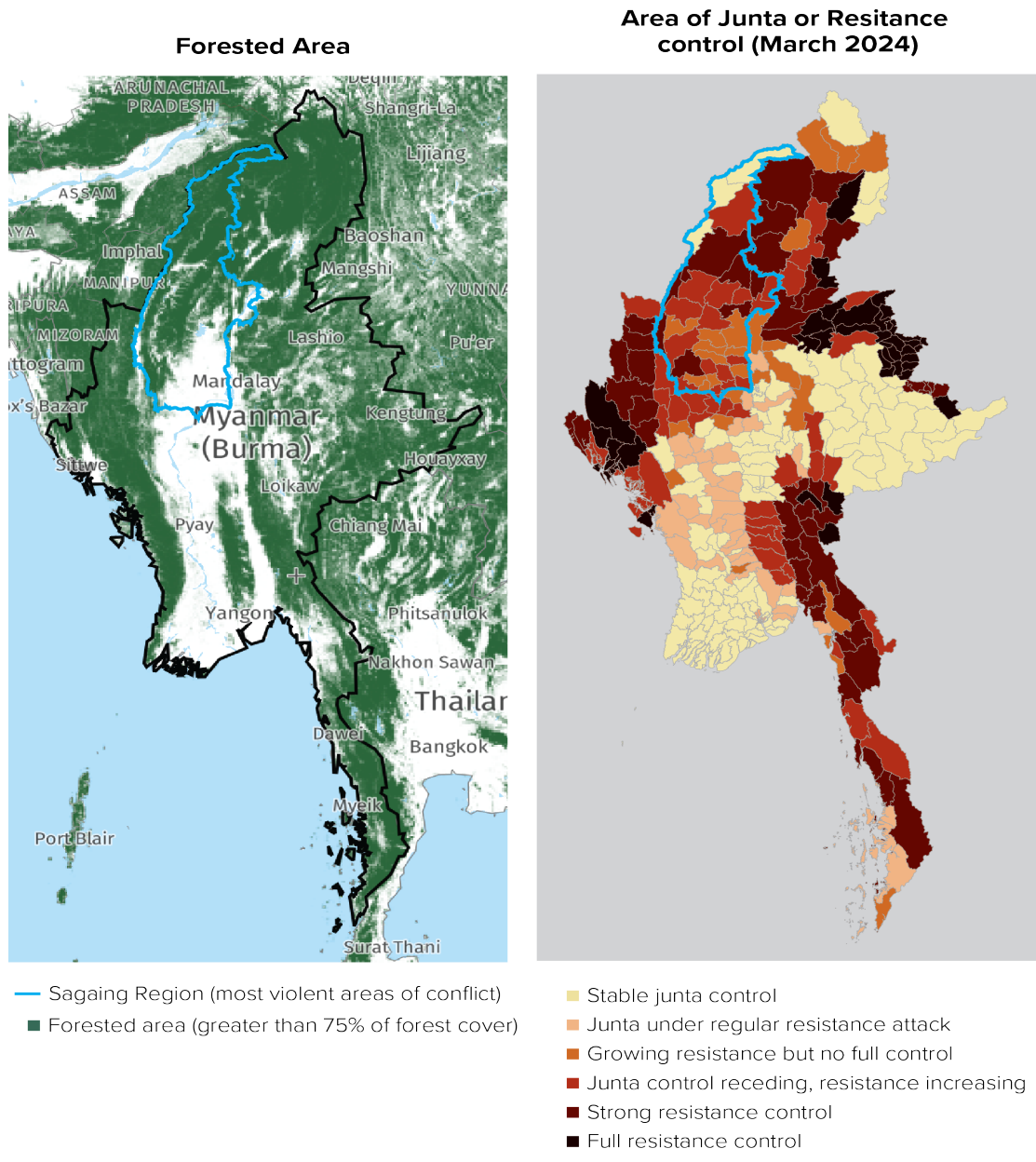
Despite the lack of security, illegal logging continues (Annex 3), but enforcement efforts appear to have dropped since the coup. Many of the regime's Ministry of Natural Resources and Environmental Conservation (MONREC) civil servants have joined the Civil Disobedience Movement (CDM) and have not reported for work.¹⁷

¹⁶ The UN Office for the Coordination of Humanitarian Affairs' (OCHA 2022) reports that almost half of Myanmar's 566,100 internally displaced person (IDPs) are from the Sagaing Region, and more than half of the 7,200 civilian structures that have been destroyed by the Sit-Tat are in the Sagaing Region. Indeed, production at copper mines in the Sagaing Region run by Chinese companies Wanbao and Yangtze—the largest mines, by production, in Myanmar—also reportedly halted soon after the coup, first due to workplace strikes aligned with the Civil Disobedience Movement (CDM) but now largely as a result of "the threat posed by armed resistance groups." See: <https://www.irrawaddy.com/news/burma/sagaing-resistance-claims-to-have-killed-35-myanmar-junta-troops.html>; https://reliefweb.int/sites/reliefweb.int/files/resources/OCHA%20Myanmar%20-%20Humanitarian%20Update%20No.17_Final.pdf; <https://www.frontiermyanmar.net/en/collapse-in-minerals-exports-robs-junta-of-key-revenue/>.

¹⁷ See: <https://www.thethirdpole.net/en/nature/perilous-future-for-myanmars-pristine-forests-after-coup/> and <https://www.irrawaddy.com/news/burma/myanmar-juntas-coup-gives-greenlight-to-timber-traffickers.html>.



Figure 4 | Overlap of Myanmar's forested areas and areas of contested control



Source: Global Forest Watch and SAC-M 2024.

3.2 National Unity Government (NUG) response

The National Unity Government (NUG),¹⁸ operating as a government-in-exile, has established its own Ministry of Natural Resources and Environmental Conservation (MONREC). The NUG’s MONREC has issued policy statements about natural resources, often in coordination with Ethnic Resistance Organizations (EROs) who have control over various territories.

Through its Interim Resources Management Framework, the NUG (2022) has also declared a ban on all commercial logging, allowing only “subsistence and non-commercial uses.” This is an important component of the NUG’s strategy of cutting off the cash flow to the State Administration Council (SAC) to tip the scales in favor of the resistance. The Stimson Center (2023) notes: “the NUG’s broad revenue denial strategy has the potential to both deprive the military government of resources as well as legitimacy by adding further pressure on a regime that has a track record of economic mismanagement.”

However, the NUG’s commercial logging ban does not affect areas controlled by EROs, where the NUG (2022) recognizes that “the policies and regulations enacted by these organizations shall be abided.”¹⁹ This aligns with the stated objectives of the NUG’s (2022) governing framework to “support the formulation of the land and natural resources management principles in accord with the Federal Democracy Charter” (FDC). Thus, the NUG’s recognition of ERO self-administration reinforces the FDC’s principles of local rights to self-determination, including control of natural resources and associated revenue.

3.3 Timber auctions

While reporting minimal production figures, the junta has advertised timber auctions: 107 auctions of teak (split almost evenly between logs and conversions with 56 and 51 auctions, respectively), 36 auctions of logs of other hardwood species (85 percent of which is kanyin [*Dipterocarpus* spp.]), and three auctions of processed material including sawnwood and/or veneer (Table 1). All teak auctions were centralized in Yangon, while hardwood auctions were more geographically dispersed, with only seven taking place in Yangon.

Table 1. Volume of timber reported as auctioned by the MTE since the coup (m³)

	2021	2022	2023	2024	Total
Teak logs	7,892	13,531	24,781	6,590	52,793
Sawn teak	--	4,830	5,731	1,373	11,935
Hardwood logs	9,405	54,538	12,863	10,436	87,242
Sawn hardwood	--	--	583	212	795

Source: MTE.

¹⁸ After the coup, “a faction of the deposed elected NLD government...formed the Committee Representing the Pyidaungsu Hluttaw, to serve as the interim elected legislature. In turn, the National Unity Government (NUG), including several ethnic minority leaders, was formed to serve as the executive branch. While the NUG has strong public support, especially among the Bamar ethnic majority, the diverse anti-coup movement, which includes a range of ethnic and religious minority organizations and armed groups, has failed to fully unify because of residual distrust between the NLD, civil society, and ethnic minority communities” (USIP 2022).

¹⁹ The other stated objectives of the NUG Interim Resources Management Framework are: to prevent the illicit trade of forest and biodiversity resources; assess and address the impacts of this trade; foster development by “systematically managing forest resources and biological diversity”; collaborate with local people and ethnic groups including indigenous people in this management; and to regulate forest resources consistent with international standards.



Since the coup, the volume of teak logs offered at auctions has dropped significantly, with annual averages of 13,198 m³ representing approximately half of the pre-coup auction volumes (2020 was excluded due to COVID-19 pandemic disruptions). Of particular significance, only 303 m³ out of the total 52,793 m³ of teak logs auctioned were classified as export-grade (sawing grade one or two). The MTE has ceased reporting auction results, including sale prices and buyer identities, marking a departure from previous transparency practices.

4 The Impact of International Sanctions

4.1 MTE sanctions

A broad range of sanctions on the SOEs running Myanmar's natural resource sector, such as the MTE, were imposed by a coalition of international actors (led by the US, EU, UK, Switzerland, and Canada) and complement the NUG's revenue-denial strategy. They appear to be having a major impact and the reported trade in forest products to these jurisdictions has almost completely stopped (Figure 2).

Further, under the US sanctions regime, buyers—even those that are not American—may not use US dollars (US\$) to benefit the MTE. As a result, the MTE has been “denied international [banking] swift transfers” (ITTO 2022b). Exporters have reportedly complained that banks in Singapore “adopted tough measures to stop timber related financial transactions...halt[ing] transactions to Myanmar if it believed they were payment for timber exports.” Singapore further required those related to the timber trade to close their accounts (ITTO 2022c).

The situation was further complicated when the junta required traders to convert incoming US\$ to local currency within one day of any transaction, and “payments to MTE for logs had been stalled for about three months” (ITTO 2022d). Given that this left buyers with no US\$ to use to purchase logs (ITTO 2022e), exporters urged the MTE to accept Myanmar kyat (MMK) rather than US\$ (ITTO 2022f). While the MTE briefly accepted bids in local MMK currency, it quickly reverted to requiring US\$ payments (ITTO 2022d). This was evidenced by the August 30, 2022 announcement from U Lwin Maung Oo, general manager of MTE's Export Department, which stated that the bids for the August 30, 2022 auction were to be in US\$. This insistence on US\$ transactions underscores the junta's need of hard currency – a point further illustrated by their requirement for Forest Products Joint Venture Corporation (FPJVC) to convert its US\$16-18 million in holdings to MMK, resulting in approximately US\$5.5 million in losses due to the junta's artificially high fixed exchange rate (BETV Business News 2022).

4.2 | Additional sanctions

International sanctions have expanded beyond Myanmar's state-owned enterprises to include the MFTB, the junta's primary institution for hard-currency transactions, forcing reliance on private banks for international transactions. The impact of these sanctions was publicly acknowledged by the regime's Deputy Minister of Planning and Finance, U Maung Maung Win, in August 2023. He confirmed their significant effect on foreign currency expenditures, import and export trade, and investments (The Irrawaddy 2023). The Independent Economists for Myanmar (2021) calculated that freezing deposits linked to the MFTB and the Myanmar Investment and Commercial Bank (MICB) across all sectors "would cut off roughly US\$2 billion per year in financing for the military."

The financial pressure intensified when the Financial Action Task Force (FATF) blacklisted Myanmar as a terrorist jurisdiction in October 2022, placing it in the same category as North Korea and Iran (FATF 2022). The timber industry's vulnerability to these measures was evident in exporters' concerns about their severe impact on trade. FATF further escalated its position in 2024, calling on enhanced due diligence measures from its members and other jurisdictions regarding Myanmar-related transactions, while warning of potential countermeasures if progress is not demonstrated by February 2025.

4.3 | National enforcement of international sanctions

4.3.1 European Union (EU)

The EU reported more than US\$73 million in trade in forest products from Myanmar since the coup, but almost no direct trade since mid-2023.

While individual EU Member States maintain primary responsibility for law enforcement actions within their territories, Europol can provide crucial coordination and intelligence-sharing capabilities for cross-border operations, as demonstrated by its November 2023 orchestration of an international operation against illegal timber trade with authorities from France, Germany, Italy, Netherlands, Portugal, and Spain. The actions targeted environmental crime, illegal logging, smuggling, document fraud, money laundering, and tax evasion. After 226 inspections, timber from Myanmar with an estimated value of €12,000 was seized (Europol 2023).

4.3.2 Germany

In April 2022, German authorities searched timber trader Stefan Bührich's private villa and two of the company WOB Timber's locations in Hamburg (of which he was previously a director), seizing 111 m³ of teak worth over €1 million and company assets worth €1.7 million "amid fresh allegations concerning 10 counts of illegally trading Myanmar teak into Germany via Croatia" (Environmental Investigation Agency (EIA) 2022). According to the EIA (2022), the Regional Court in Hamburg had previously found WOB Timber guilty of importing 31 shipments of timber between 2008 and 2011 worth millions of euros, in violation of earlier EU sanctions on Myanmar's previous military junta, and resulting in a €3.3 million fine for the company and a €200,000 fine plus 21-month suspended prison for Bührich. They "warned that further cases would result in even harsher penalties."



On appeal, the case was referred by the German Bundesgerichtshof (the Federal Court of Justice) to the Court of Justice of the European Union (CJEU) to determine, among other issues, if the origin of teak logs could be altered through processing. In their September 2024 ruling, the CJEU ruled that Myanmar teak processed into sawnwood in Taiwan could be considered of Taiwanese origin, while less processed timber would retain its Myanmar origin. According to the EIA, the court also ruled that sanctions only covered goods “imported into the EU directly from Burma/Myanmar...It is yet to be seen how the German court will apply the CJEU ruling” (EIA 2024a).

4.3.3 Netherlands

The Dutch superyacht builder Oceano accepted liability and settled a case with the Netherlands Public Prosecution Service by paying a €150,000 fine for breaching the EU Timber Regulation (EUTR) (Super Yacht Times 2024). The violation specifically concerned their failure to conduct adequate due diligence regarding the origin of teak allegedly sourced from Myanmar. Oceano had purchased the teak from a German trader, as well as teak furniture from a Turkish company.

The case gained additional attention due to Oceano’s high-profile client base. Media reports have linked Oceano-built yachts and the use of Myanmar teak to prominent individuals including Jeff Bezos and Steven Spielberg.

4.3.4 United Kingdom (UK)

At the end of 2024, the UK courts imposed a penalty (fines and other costs) on Sunseeker International Ltd, a prominent yacht builder, of £359,000 (EIA 2024c). The company had pleaded guilty to, among other criminality, failing to exercise due diligence related to timber imports. The case specifically involved 11 shipments where the company failed to meet due diligence requirements. A significant point noted by the presiding Judge was that the EIA (2024c) had “flagged the risk of illegal teak in the Sunseeker’s supply chain...as early as 2018,” yet the company had continued its practices. The timing of this legal action coincided with a major corporate ownership change, as Sunseeker was acquired from the Chinese conglomerate Dalian Wanda Group by a partnership of Orienta Capital Partners and the Miami-based investment firm Lionheart Capital in October 2024 (EIA 2024c).

4.3.5 United States (US)

The US has also taken steps to ensure compliance with its Myanmar sanctions regime, with five federal departments (US Departments of State, Treasury, Commerce, Labor, and Homeland Security) and the US Trade Representative having jointly “warned companies to be extremely wary of doing business in Myanmar, citing the risks of being linked to a military government involved in lawlessness and human rights abuse. Those involved with businesses controlled by the military regime run the risk of engaging in conduct that may expose them to significant reputational, financial and legal risks including breaking sanctions and money-laundering laws” (SCMP 2022).

Despite these explicit warnings, a few companies chose to continue to trade, even after the sanctions came into effect. US-reported imports of Myanmar forest products continued, totaling over US\$34 million since the coup. Imports remained relatively steady until 2023, when direct trade virtually ceased. Prior to this drop, the number of traders had already effectively dropped to two: East Teak Fine Hardwoods and J. Gibson McIlvain Co. Inc, who together were responsible for over 80 percent of US imports.

4.4 | Credibility of claims of sanction exemptions

Traders appear to have claimed an exemption from sanctions for timber products, based on statements from exporters in Myanmar, who have “expressed their understanding that the products from the logs for which the payment had been settled before the respective dates are exempted from the sanctions” (ITTO 2022h). By March 2022, this reportedly drove the price of logs held by private brokers in Yangon up by 30 percent (ITTOh).

However, this position taken by traders is difficult to reconcile with the US government’s explicit warnings about conducting business in Myanmar, with at least five issues challenging the traders’ interpretation:

1. Under Myanmar’s 1989 SOE law²⁰ [Chapter 2, 1.1], the MTE “has the sole right to carry out...economic enterprises related to [the] Extraction of teak and sale of the same in the country and abroad.”
2. Although the traders claim to purchase only from private brokers rather than the MTE, the original source of these logs is unclear. Almost no export-grade teak has been auctioned since November 2021. While direct sales from the MTE to preferred buyers were historically common (Forest Trends 2021), they have been prohibited since 2013. In part, the prohibition was because these below-market sales to “cronies” generated government losses of billions of dollars.

Furthermore, the US government, for example, addressed this issue in their 2024 advisory highlighting the continued risks of trade with Myanmar: “To be clear, U.S. persons are prohibited from engaging in transactions with MTE, regardless of whether the sales are of products that MTE had “stockpiled” before or after the imposition of sanctions in 2021” (USG 2024).

3. It appears that the teak the MTE has been selling is from confiscated logs, despite the junta’s MONREC’s existing ban on the export of material from confiscated logs (MTE 2022). For example, in October 2024, confiscated timber products were reportedly auctioned in southern Shan State (GNLM 2024). MONREC’s prohibition is especially relevant for importing jurisdictions that have legality legislation prohibiting the importation of wood harvested or traded in violation of producer-country laws and regulations (such as the EUTR, UK Timber Regulation, US Lacey Act, Vietnam TLAS, Australian Illegal Logging Prohibition Act, and China’s Article 65 of its Forest Law).

Even if traders argue that the material is not from confiscated logs, nor from logs bought from the MTE post-sanction, it is still not clear how the traders would demonstrate these facts, given that MONREC’s (2020) chain-of-custody system is not seen as reputable. The ITTO (2022i) notes: “[m]ost EU member States regard Myanmar timber as illegal given the current conflict, poor traceability and corruption... Myanmar urgently needs a reliable Chain of Custody system so that millers in Myanmar and the importers will be convinced no illegal timber has entered the supply chain.” A Forest Trends (2022) report pointed out that, even before the coup and “since 2018, the [European Community] has maintained a common position that no trade in Myanmar teak could meet the requirements of the European Union Timber Regulation (EUTR), especially legal acquisition. Thus, EU laws had already made imports of Myanmar teak a legal violation years before the coup.”

²⁰ See: <https://www.burmalibrary.org/en/the-state-owned-economic-enterprises-law-slorc-law-no-989-english>.



The EU's position regarding Myanmar timber trade creates implications for US importers under the Lacey Act. Because the Lacey Act requires importers to exercise "due care" in ensuring timber legality, the well-documented EU position serves as clear evidence that Myanmar timber carries high illegality risks. US importers who continue to trade without addressing these documented risks could be found in violation of the Lacey Act, as they cannot credibly claim ignorance of illegality risks that have been highlighted by the EU position (and subsequent enforcement actions).

4. The Myanmar Forest Certification Committee (MFCC) dossier, explaining Myanmar's export requirements, states that "timber products may only be exported through one of the three Yangon ports: the old port on the Yangon River, the Asia World Container Port (AWCP) and the Myanmar International Terminal Thilawa. All exports from other seaports and across land borders are considered to be illegal" (MONREC 2020, 16). However, these ports appear to be linked to the following sanctioned entities:
 - a. The old port is reportedly owned by the sanctioned military conglomerate Myanma Economics Holding Limited (MEHL) (Myanmar Now 2020);
 - b. The other major sanctioned military conglomerate, Myanma Economic Corporation, owns the Ahlone International Port Terminal and the Hteedan Port (HSN 2022), the latter of which is managed by the same company (Asia World Co. Ltd.) that manages the AWCP and the Thilawa Special Economic Zone (Myanmar Japan Thilawa Development Limited 2025).
5. Even if traders avoid direct violations of MTE sanctions by claiming to source from private traders who obtained timber before sanctions were implemented, they may still be violating other sanctions targeting military-linked entities. Additionally, any payments processed through the MFTB would violate existing sanctions, regardless of the timber's sourcing date or the validity of pre-sanction purchase claims.

5

War Crimes

Given that all this is occurring in the context of an ongoing conflict, those trading in Myanmar timber products may be at risk of criminal liability and associated financial exposure if they are associated with or commit the international war crime of pillage. The gravity of this risk is underscored by the Office of the United Nations High Commissioner for Human Rights, which recommends that the UN "undertake further investigations...with the assistance of relevant experts, including on financial investigations...[into] possible instance of the war crime of pillaging in Myanmar" (OHCHR 2022). According to Forest Trends, "as a war crime, pillage is sufficiently grave that any state can assert criminal jurisdiction, regardless of where the pillage took place or the nationality of the perpetrator(s) and it has no statute of limitations, leaving perpetrators of pillage at risk of prosecution for the rest of their lives" (2022).

6 Conclusion

Since the coup, the Myanmar forest sector has been characterized by a severe lack of transparency, with the MTE reporting little production and sales data. This makes it difficult to determine how the sector is being run, and therefore it is impossible to assess legality, much less sustainability. This decline is particularly evident in the Sagaing Region, where armed conflict is disrupting the sector. While the sector appears to be declining overall, trade with China and India remains robust.

International sanctions by the US, EU, UK, Switzerland, and Canada appear to be working. However, Chinese and Indian buyers are still purchasing the majority of all reported trade. While this trade has helped finance the military regime and likely emboldened SAC leaders, the significant volumes reportedly flowing across the border into China's Yunnan Provinces suggest that resistance groups and other non-state actors, some of whom operate as transnational criminal organizations, are also profiting from this trade.

The impact of both the State Administration Council's 2022 logging moratorium and the National Unity Government's own moratorium remains unclear. With timber confiscations at historic lows and pre-coup stockpiles likely exhausted, questions arise about the MTE's ability to meet continued Chinese and Indian demand through legal channels.

Given all of this, there is a significant reputational risk for any traders buying timber products from Myanmar, not to mention legal liability related to sanctions. Given that the MTE only allows US dollars and Euros (in addition to Myanmar kyat) for the purchase of teak, buyers using US\$—even those that are not American—are subject to the US sanctions regime, and likewise European sanctions if they use Euros (MTE 2024, §2c). Importantly, there is precedent for the US prosecuting non-American actors. In addition, traders could be prosecuted for the war crime of pillage, which has no statute of limitations, leaving perpetrators of pillage at risk of prosecution for the rest of their lives (Forest Trends 2022).



7

Recommendations

- Jurisdictions should implement the FATF call that companies, and financial institutions in particular, apply enhanced due diligence as part of their business relationships with Myanmar.
- Countries should also continue to enforce their sanctions regimes to prevent the import of MTE-linked forest products, including those re-exported through other jurisdictions.
- The international community should provide further support for opposition to the junta, especially those authorities in ERO territories managing land and forests, civil society organizations (CSOs) working for better land and forest governance, and the National Unity Government in exile.
- Buyers, especially in sanctioning jurisdictions and/or countries with legality legislation, must implement enhanced due diligence to ensure they do not buy illicit timber from Myanmar, including shipments re-exported through other less discriminating countries (such as China).
- Finally, the international community can best assist Myanmar's resistance by putting maximum pressure on the regime now that the junta is most vulnerable.

Annex 1 Reporting from Myanmar

According to the Myanmar Information System (CSO-MMSIS 2022), forestry contributed about 0.1 percent of GDP prior to the pandemic. During the COVID outbreak, forestry production was reportedly cut in half (while GDP overall was only cut by less than a third).

In the most recent reporting from Myanmar, during 2023-2024 fiscal year, forestry fell further to 0.001 percent of the GDP. Exports of forestry products in FY2023 also reportedly fell to less than 0.5 percent of all reported exports (US\$68 million out of US\$15 billion in exports). It is highly likely that unregulated and illegal logging are not included in these official reports.

The MTE has not reported any data on production since the coup, although harvesting resumed in 2023 following the one-year logging ban (MTE 2023). The junta's MONREC reports confiscations, but at much lower levels than prior to the coup (Annex 3). The NUG also reports some confiscations in areas outside of the control by the regime.

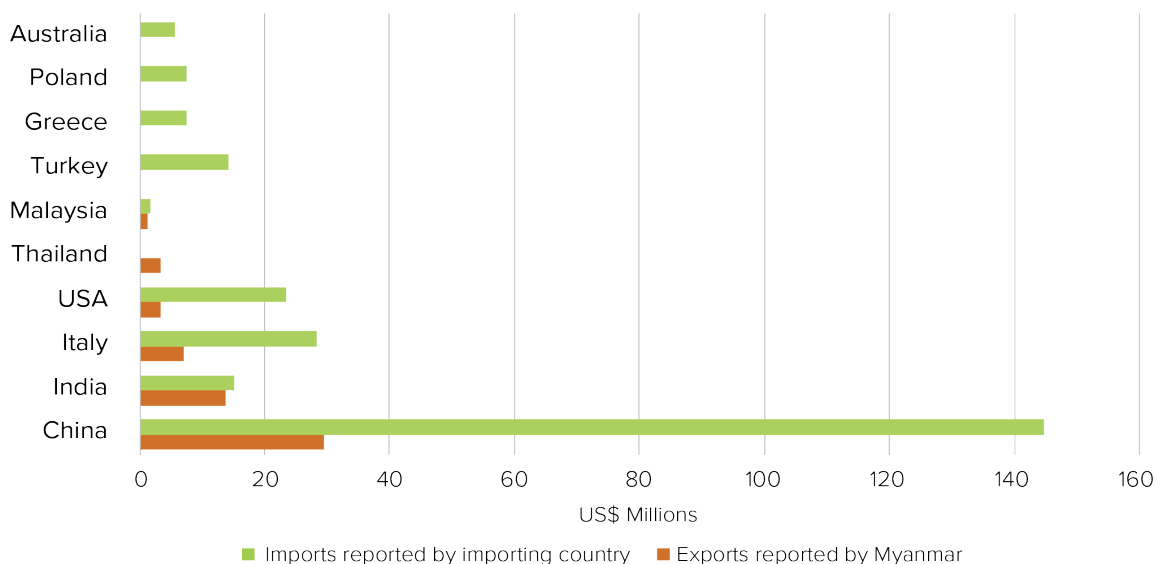
Annex 2 Reporting outside of Myanmar

Comparison of trade reporting by Myanmar and by importing countries

While Myanmar itself reported US\$121 million in the export of sawnwood, plywood, and veneer between February 2021 and July 2022 (the last day of reporting from Myanmar), importing countries reported three times that in the 18 months since the coup.

Myanmar disaggregates exports by country for sawnwood only. Here too, importers reported four times more than Myanmar reported exporting (US\$228 million versus only US\$70 million). China had the largest discrepancy. The country reported imports of US\$144 million, whereas Myanmar only reported exports to China of US\$30 million.

Figure 5 | Discrepancies between Myanmar’s export data and trading partners’ import data for timber products, February 2021 – July 2022 (US\$million)



Source: CSO-MMSIS, General Administration of Customs, P.R. China; UN Comtrade.

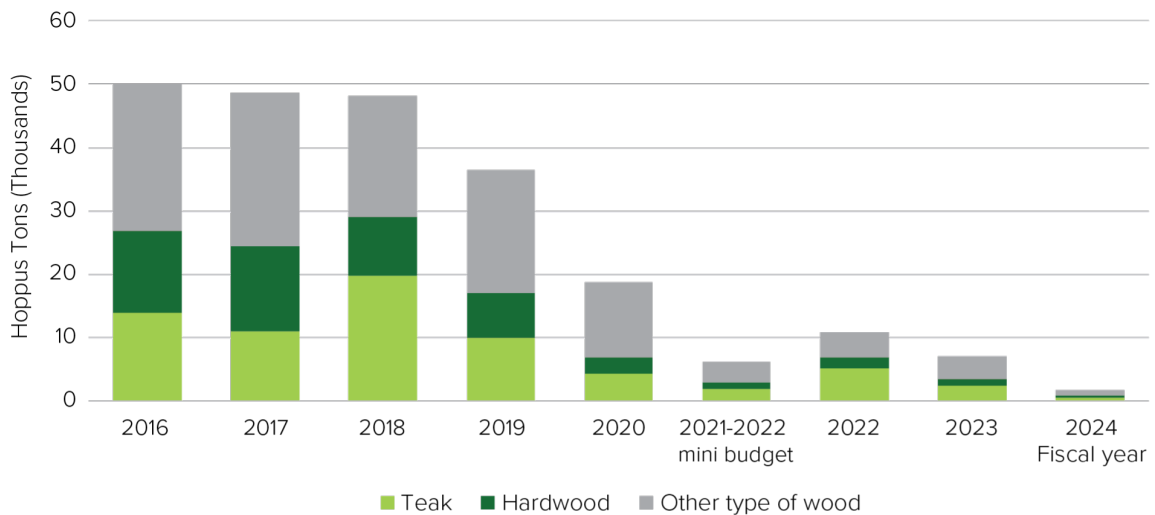
Annex 3 Confiscations

Regime reporting

Since the coup, the junta reports a dramatic decline in the reported amount of timber seized (Figure 6). During the NLD-led government period, seizures were reportedly around 50,000 hoppus tons (about 90,000 m³) per year. Since the coup, reports have dropped to, at most, 10,000 hoppus tons.



Figure 6 | Timber products seized by the junta's MONREC Forest Department, FY2016-2024



Source: MONREC Forest Department.

Note: Fiscal year 2024 data only include 10 months (April 2024 – January 2025). The FY originally was October – September, until 2021 when a “mini-budget” ran October 2021 through 2022, after which FY was shifted to April – March of each year.

Because reports of illegal logging continue (see below), it is likely that enforcement efforts have dropped since the coup. It is likely that the decline in seizures is linked mainly to reduced territory control (e.g., Kachin News 2022). Many of MONREC’s civil servants have joined the CDM and have not reported for work (Dialogue Earth 2021). Even before that, the FD had “only one employee for every 8,000 ha of forest overseen, a near-impossible task” (ITTO 2022). Furthermore, the FD’s Community Monitoring and Reporting System (CMRS²¹) has reportedly stopped working since the coup, further restricting enforcement activities. Police forces are being gutted as the Sit-Tat has reportedly found it difficult to recruit to the military since the coup (USIP 2022); the Forestry Security Police is one of the units reportedly axed due to a shortage of officers (Irrawaddy 2022).

Production (including reports of illegal logging)

In contrast to MONREC’s reported decrease in seized timber, many media sources report continued illegal logging across Myanmar. For example, smugglers work freely with the military junta or the revolutionary groups because both sides are profiting from permitting illegal logging (FM 2023). Local sources informed the Kachin News Group (2023) of excessive hardwood and teak harvesting in Indaw and Bamauk townships, Sagaing Region, controlled by the KIA-PDF. A released document indicates that in February 2024, the NUG granted K-One permission by coordinating with the KIA to extract 818 tonnes (1,475 m³) of teak logs from Bamauk township.²²

²¹ For a description of the CRMS, see p. 50, MEITI (2020) forestry report for FY2017. The CRMS webpages at MONREC FD are no longer working.

²² See: <https://web.facebook.com/share/p/sU7rcBQzd7soJ7hZ/>.

The Kachin State Working Group Conservation Group (KCWG) told The Irrawaddy (2021) that they have recorded an escalation in illegal logging in the northernmost part of Kachin following the coup (Khaungglanhpu and Chipwi townships are controlled by militias armed by the Sit-Tat). According to the watchdogs, they witnessed rampant illegal logging in Sagaing and at least 20 to 30 truckloads of timber being hauled out of the Alaungdaw Kathapa National Park every day from late March to mid-May 2022. A local Bago resident reported: “Smuggling has become more common after the coup. By paying the toll fees to police and different armed groups, people are transporting illegal logs with cars and motorbikes easily. In the long run, the forest may be destroyed” (DVB 2022). A witness said that there are a lot of stockpiles aside the road of Tamu-Kalay-Yargyi-Monywa.

Likewise, social media reported increased illicit trade at Tamu on the border with India from Sagaing region (Facebook 2021a, b). In just two days in March 2022, authorities reportedly seized almost US\$3 million in illicit trade (Facebook 2021c).

ITTO (2022j) reports that the Myanmar Anti-Illegal Trade Committee claim on June 5, 2022 that over 14 million MMK (about US\$7,500) in illegal timber was seized in Yangon and Bago Regions, and the Region Forest Department under the management of the Bago Region Anti-Illegal Trade Special Squad reportedly seized more than 7.5 tons of illegal teak in Toungoo District (worth more than 3.75 million MMK (about US\$2,000)) on June 3 and 13.9 tons the next day (worth almost 5 million MMK (about US\$2,700)).

National Unity Government reporting

The NUG itself has reported monthly seizures of illicit timber by PDFs in Sagaing, Mandalay, and Magway (over 3,600 hoppus tons (about 6,490 m³) of teak and hardwood, Table 2). The NUG reported auctioning only 14 hoppus tons on April 21, 2022, raising about 14 million MMK (about US\$7,500), or about US\$300/m³. This is only about a quarter of the local sales prices for teak conversions sold by the MTE in 2017 and a third of the reference value of sawnwood from Myanmar reported by the ITTO for India in May 2022 (US\$791-980/m³) (ITTO 2022f).

Table 2. Seizures (in hoppus tons) by the NUG and PDFs of semi-processed forest products, both logs and conversions

Year	Timber Volume	Pieces of poles/ semi logs	No. of door frames	No. of table sets
2022	199	2,430	1,082	--
2023	2,587	603	138	60
2024	1,183	36	--	--
Total	3,969	3,069	1,220	60

Source: NUG-MONREC monthly journal.



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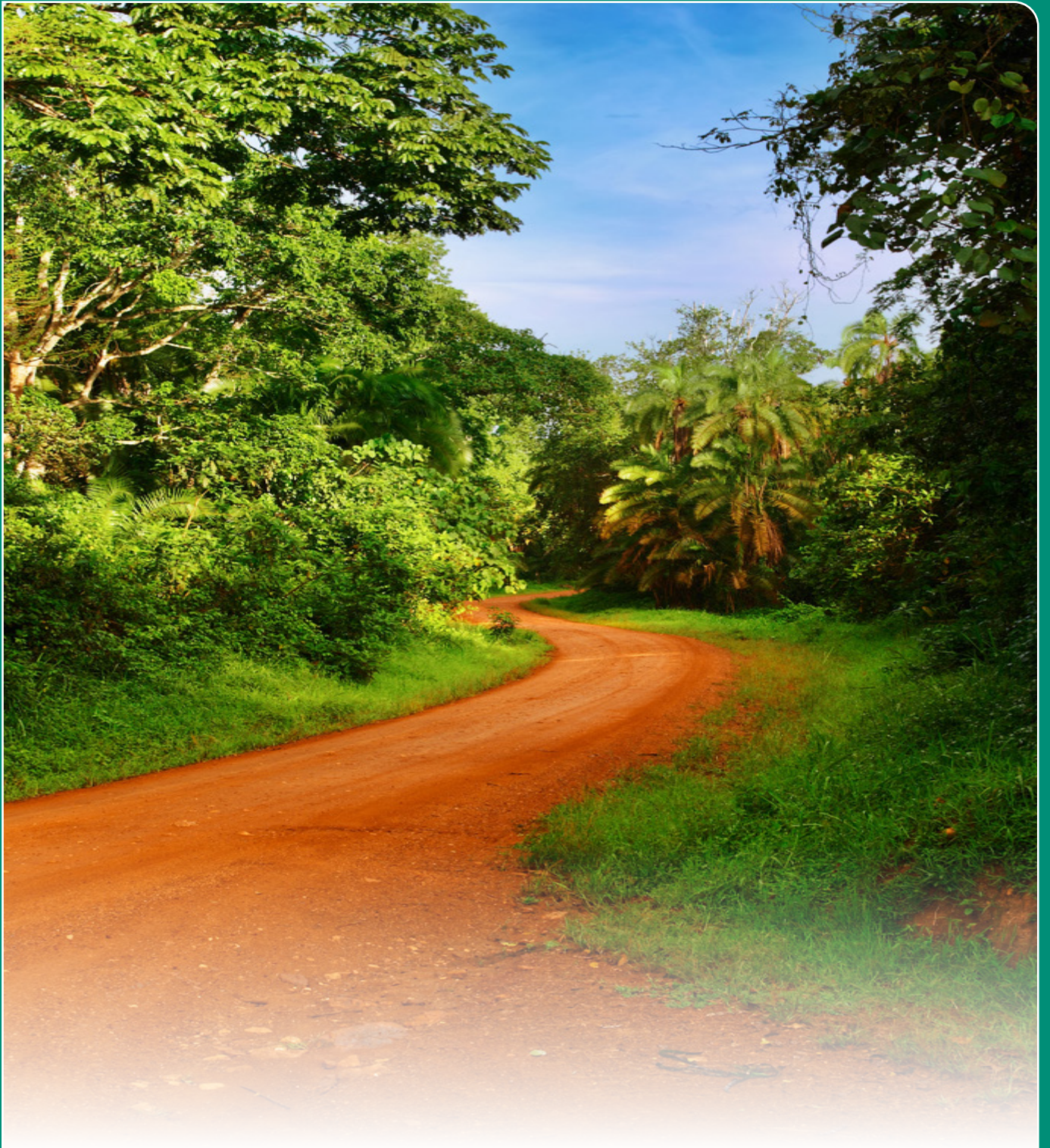
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Forest Trends works to conserve forests and other ecosystems through the creation and wide adoption of a broad range of environmental finance, markets and other payment and incentive mechanisms. This report was released by Forest Trends' Forest Policy,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

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