CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES
OF WILD FAUNA AND FLORA

Sixty-sixth meeting of the Standing Committee
Geneva (Switzerland), 11-15 January 2016

Interpretations and implementation of the Convention

Species trade and conservation

AFRICAN TEAK (*PERICOPSIS ELATA*)

1. This document has been submitted by the Democratic Republic of the Congo.*

2. This document relates to the two annexes complementing the updated NDF for 2015 that have been drafted by the Democratic Republic of the Congo (DRC) following the comments, suggestions and recommendations made to its delegation at the 22nd meeting of the Plants Committee held in Tbilisi, Georgia, in October 2015.

3. These annexes were expected to address certain concerns of the Plants Committee working group and provide clarifications to the Standing Committee, which will meet in January 2016 in Geneva. These new annexes complementing the non-detriment finding (NDF) submitted to the CITES Secretariat in August 2015 were to be submitted to the European Union no later than 12 November 2015.

4. They refer to the following:

   – Section 8 of the 2014 NDF on the strengths and limitations of the proposed approach and future prospects, which was not included in the 2015 NDF.

   – The incompatibility between Resolution 14.7 and the decisions made in the NDF dated August 2015 on the evaluation and management of quotas on the basis of annual allowable cuts (AACs), as well as the arrangements to export timber harvested in 2015 on the basis of AACs for 2014.

   – The stockpile of timber harvested in 2014 but not exported in the same year and the counting of volumes exported under the 2014 quota.

   a) Section 8 of the 2014 NDF

   Section 8 of the 2014 NDF addresses the strengths and limitations of the approach proposed in that first version of the NDF. The section was not included in the revised version of the NDF for *Pericopsis elata* in the DRC published in August 2015. Participants at the 22nd meeting of the CITES Plants Committee held in Tbilisi expressed the wish that this section be included again in the NDF.

   This annex incorporates and updates the content of that section. The section will be included again in the next revised versions of the NDF submitted to the Standing Committee and to the Conference of the Parties.

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* *The geographical designations employed in this document do not imply the expression of any opinion whatsoever on the part of the CITES Secretariat (or the United Nations Environment Programme) concerning the legal status of any country, territory, or area, or concerning the delimitation of its frontiers or boundaries. The responsibility for the contents of the document rests exclusively with its author.*

This document clearly outlines the strengths of the proposed approach, its advantages compared with a large-scale extrapolation and its limitations, as well as future prospects regarding the improvement of knowledge on Afrormosia for the purpose of its sustainable exploitation.

The DRC proposes this document to the Standing Committee to include it in the 2015 revised NDF.

b) Incompatibility between Resolution 14.7 and the decisions of the 2014 NDF on the evaluation and management of quotas

The second document refers to the problem of timber harvested in 2015 on the basis of annual allowable cuts for 2014. Despite being perfectly legal, this timber cannot be exported under the 2015 quota because it was felled in 2014, pursuant to CITES Resolution 14.7, or under the 2015 quota as defined by the NDF, because it results from AACs for 2014.

To date, the incompatibility between both texts does not make it possible to manage this situation linked to the establishment of a quota management and monitoring system considering the specificities of the sustainable exploitation of lumber. Pending a decision of the Standing Committee on the rules that should be applied to manage the quotas, the DRC proposes that the volume of timber harvested in 2015 on the basis of annual allowable cuts for 2014 be included in the 2015 quota.

La DRC requests some clarification, given that this situation will persist as long as CITES regulations and the NDF remain in contradiction with each other.

c) The stockpile of timber harvested in 2014 but not exported yet

Operators still have significant stockpiles of timber felled in 2014.

Apart from presenting the updated 2015 NDF, in section 7, regarding these timber stockpiles, the DRC requests that the following elements be considered as well:

The general principles that should be followed for the establishment and management of national export quotas in the context of CITES are laid down in Resolution Conf. 14.7 (Rev. Cop 15) and its annex, "Guidelines for management of nationally established export quotas". Apart from outlining the general principles that should be followed to establish and manage quotas, this document specifies, however, that "there may be exceptions and reasons for departing from these general principles in certain cases" (paragraph 1). It also mentions that, for the management of harvests, it is important to "take account of the regulatory and biological context" (paragraph 6). Finally, it should be underlined that these guidelines "need to be practical and uncomplicated, and not to add to the existing administrative burdens" (paragraph 7).

In the specific case of the exploitation of *P. elata* in the DRC, it seems therefore necessary to define the most appropriate system possible to establish and manage export quotas, considering in particular the regulatory context and the administrative provisions set out in the national legislation. The specific context of the current transitional period associated with the shift to the sustainable management of forest concessions in the DRC should also be taken into account when defining the system to establish and manage export quotas for Afrormosia wood in the DRC.

The elements related to this specific context that should be taken into account are widely explained in the NDF from a technical approach. However, from a socio-economic approach, the DRC would like to draw the attention of the members of the Standing Committee to the need to set an exceptional and unique transitional quota to enable the shift from one quota management system to the other. Indeed, forestry companies are facing several constraints associated with forest management that require great efforts to implement a sustainable management of the forest resource. Considering that the timber was legally harvested, not allowing its export amounts to depriving companies of the means to operate, threatening their survival. As a result, forestry companies with precarious cash-flow situations risk going bankrupt and/or significantly reducing their work and production capacity, thus jeopardizing all the direct and indirect jobs they provide. This implies an alarming risk of increasing the unemployment rate, illegal logging in forest concessions, poaching, etc.

As regards the State, this would decrease its income due to the non-payment of taxes to the Treasury.

Forestry companies have signed agreements with local communities in the framework of the social clauses of forestry specifications. Populations would be deprived of the direct benefits of forest exploitation

and may cease to experience its positive impacts. Therefore, they would no longer obtain any socio-economic improvements in accordance with the Forest Code. All the efforts of the Government of the DRC in the framework of the fight against poverty would be compromised; this would lead to social unrest in forest concessions and to lawsuits against forest concession holders for not honouring their commitments with regard to local communities under the law.

In short, the whole process of sustainable forest management risks being jeopardized, which raises the question of what would have been the use of all the financial, technical and material support provided by the various donors and cooperation agencies in the process.

For all these reasons and many more, the DRC calls for the validation and establishment of an exceptional transitional quota to allow all the stakeholders to benefit from the stockpile of Afrormosia timber that has already been felled.

The DRC seeks the advice of the Standing Committee on this stockpile of timber harvested in 2014.

STRENGTHS AND LIMITATIONS OF THE PROPOSED APPROACH
COMPLEMENTING THE NON-DETRIMENT FINDING FOR *PERICOPSIS ELATA*

The revised non-detriment finding for *Pericopsis elata* in the DRC proposed in August 2015 did not feature the section on the strengths and limitations of the proposed approach included in the first version of 2014.

Participants at the 22nd meeting of the CITES Plants Committee held in Tbilisi wished expressed the wish that this section be included again in the NDF.

This information note incorporates and updates the content of that section. The section will be included again in the next revised versions of the NDF submitted to the Standing Committee and to the Conference of the Parties.

8. Strengths and limitations of the proposed approach and future prospects

8.1 Advantages of the proposed approach compared with a large-scale extrapolation

Poplations of *Pericopsis elata* occur in a distribution area with an estimated surface of 38,000,000 ha, that is, in an area that extends beyond the allocated forest concessions where this timber is harvested. However, it has been decided not to extrapolate the inventory results available for the forest concessions to the whole distribution area. Thus, only the populations present in the forest concessions for which management inventory data are available have been considered to calculate the quota.

The approach adopted, based on the results of the management inventories undertaken in concessions in the natural distribution area of the species, has made it possible to avoid the following major problems/biases, which mainly occur when extrapolating data:

1. uncertainy about the representativeness of the inventoried forest concessions *vis-à-vis* the area for which the inventory results could be extrapolated, given that *Pericopsis elata* populations are very heterogeneous (cf. finding on the gregarious nature of the species confirmed by the NDF);

2. the extrapolation to non-inventoried forest concessions could only have been made using an average population structure for the forest concessions inventoried, which would in itself have been an approximation. Moreover, and according to the estimates made, the recovery rate calculated on the basis of this average population structure would have been above 50%, which, in the first instance, would have guaranteed the legitimacy of the approach. However, it would not have been possible to verify this threshold value in non-inventoried forest concessions due to the lack of available management inventory data;

3. furthermore, using a process of extrapolation would have meant that companies not yet involved in the planning process for their concessions would have benefited from the investments made by the most advanced companies without being asked for anythign in return; by contrast, the approach adopted is likely to motivate companies to engage in the planning process.

The planning process considerably evolved between May 2014 and August 2015. During this period, the development plans of 3 concessions and the inventory reports of 6 concessions were submitted to the Government. As a precautionary measure, concessions whose management inventories are finalized but whose inventory reports have not been submitted were not considered in this revised version of the NDF. Specifically, the estimated exploitable volume of one forest concession was subtracted from the final 2015 quota.

Regulations on the preparation and implementation of the development plan evolved between May 2014 and August 2015. The recovery rate requirement for individual timber species was reduced from 50% to 30%[1]. However, in the framework of the present process, it was decided to respect the former requirements in order to maximize the recovery of *P. elata*. In particular, the companies decided to apply the increase in the minimum cutting diameter, even though it is not included in the regulations yet and they would be able to reach the

[1] *A 50% recovery rate requirement for groups of timber species was introduced. These rules prevail in the entire Congo Basin.*

minimum recovery rate required without this additional limitation for their concessions. As a result, the DRC currently has in place the strictest regulations in the Congo Basin for this timber species.

8.2 Limitations of the approach proposed in 2014 and responses provided so far

8.2.1 Bias in the use of the management inventory data

In 2014, data reported by companies to the Government were not georeferenced or linked to specific forest strata, introducing uncertainties on the validity of the analysis if certain sampling units were in a non-harvestable area.

Between the making of the 2014 NDF and its revision in 2015, raw inventory data were again reported to the Government, clarifying the strata in which the sampling units were located.

This made it possible to differentiate between *P. elata* trees inventoried in swamps and those inventoried in firm terrain. The potential of the 8 concessions for which management inventory results are available has therefore been reliably estimated.

For the concession whose development plan has been submitted, the data of the logging permit application were used, based on the harvest inventory of the annual allowable cut concerned, providing even better accuracy.

In the analysis of population structure, as indicated in section 2.3.4.1, one of the factors to be taken into account is the relative proportion of tree numbers in the smaller diameter classes. Some remarks/limitations have been put forward on the regeneration inventory:

1. Regeneration data are not directly relevant to logging operations and as such they are generally not valued by logging companies (this observation is made throughout the countries of the Congo Basin and is therefore not specific to the DRC). Because of this, prospectors may tend not to carry out these surveys as rigorously as they do for exploitable trees. Cross-checks of the same sampling units conducted by the Government tend to show that this limitation is marginal.

2. In addition, it is more difficult to identify tree species in their younger stages (leaves, bark, discharges, etc., are very different compared to adult stages) than to identify the same species in adult stages, leading to an underestimate of overall regeneration or to confusion between species[2].

3. Given that concession management inventories are primarily designed to estimate an exploitable resource and its renewal during its first harvest cycle, the inventory protocol establishes different sampling rates depending on the size of the trees. This leads to different relative errors depending on the diameter class of trees.

8.2.2 From numbers of trees inventoried to exploitable/exploited volumes

8.2.2.1 Cubic area scaling

The cubic area scaling table used to calculate the volumes on the basis of diameters estimated/measured during the preparation of the management inventories (see section 4 and Appendix I) is that provided by the Government for *P. elata* in Orientale province. The use of this scaling table has prompted the following observations:

1. the parameters establishing the scaling table (validity in terms of diameter classes, distribution of number of trees sampled by diameter class, spatial representativeness of the sample compared to the population to be measured in cubic metres, etc.) are not known, given that source data are no longer accessible and the documents available do not provide these elements;

2. information on the quality of the adjustment is not available (unspecified coefficient of determination and/or residual standard deviation; on this issue see the approach proposed by Fayolle *et al*., 2013);

3. precise details about the estimated volume are not given (from the ground level or the average

[2] *In their juvenile stages,* P. elata *trees do not yet have the features that make them easily recognizable later on.*

height of the kerf? over or under bark? up to what cut? etc.).

8.2.2.2 Harvesting rate

In the present approach, it is proposed that the harvesting rate be limited to a maximum of 80% of harvestable trees. This limitation, combined with a cutting diameter of 70 or 80 cm depending on the concession, should achieve a 50% recovery rate at least. However, when performing the calculations, the 80% ratio is no longer applied to a number of trees, but to a volume, which may lead to some bias.

8.2.2.3 Marketing coefficient

The present approach also includes a marketing rate. This rate defines the amount in the volume calculated by the cubic area scaling table which has actual value. On the basis of discussion with the stakeholders, particularly in the timber industry, this rate has been set at 85% without it currently being possible to justify this value with the results of a robust study.

8.2.3 From the exploitable/exploited volume to the volume of sawn timber

In order to apply the quota correctly, it is important to transform the volumes of sawn timber into round wood equivalent volumes. To do this, and following discussions with stakeholders (see section 8.2.2.3), the sawmill yield was set at 30% for *P. elata* (see section 6.2), and again it is not possible to validate this value with a scientifically robust study. This percentage was estimated on the basis of the average sawmill yield for export without taking into account the activities of companies to give value to wood waste by turning it into exportable by-products such as friezes and *shorts.* According to the main companies operating in the DRC, the overall yield of *P. elata* processing may amount to 45%-50%. It is therefore urgent to conduct a study on the overall processing of the species, which should initially be conducted with companies that have obtained an export quota.

8.2.4 Data from scientific installations

During the making of the 2014 NDF, the Technical and Scientific Committee in charge of making the NDF (TC-NDF) learnt that plots for scientific research, each covering a surface area of 400 ha, were being installed in the natural distribution area of *P. elata* as part of the DynAfFor project[3] but was not able to obtain more detailed information about this. It was not possible to obtain any additional information on this initiative during the update of the NDF conducted in August 2015.

Sharing information of the research conducted in these plots could (*i*) provide scientifically relevant information of the state of regeneration, (*ii*) demonstrate the goodwill of the companies involved in promoting scientific research, and (*iii*) provide a source to validate the data produced by the management inventories.

8.2.5 Recovery rate

A minimum recovery rate of 50% of exploitable trees (the legal minimum when the 2014 NDF was made) has been considered acceptable. It should be underlined that recovery rates only concern exploitable trees. Thus, the density of small trees (with a diameter smaller than the harvestable diameter) only decreases slightly during a harvest period (natural mortality and damage caused by logging operations are estimated to affect 7% of trees). However, permanent sampling plots established in exploited and non-exploited areas would provide greater insight on the impact of timber harvesting on the recovery of *P. elata*.

As explained above, regulations were modified in 2015 and the current requirement is a 50% recovery rate for a group of timber species and not for each individual species. The recovery rate for individual species is currently 30%. This management requirement is in line with the management methods implemented throughout the Congo Basin. However, as a precautionary measure, the Government decided that the case of Afrormosia would be an exception by setting a 50% minimum recovery rate for this species.

In general, when the population structure of a concession is unfavourable (Gaussian curve), support for natural regeneration is highly recommended. Such support must take into account the results of research in this field in order to select the most effective technique.

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[3] *http://www.atibt.org/dynaffor/4586530587. The donors of funds for the initiative are the* Agence Française de Développement *and the* Fonds Français pour l'Environnement Mondial.

8.2.6 Legality and administrative requirements

A number of points pertaining to the legal requirements are among the limitations of the methodology used and therefore deserve to be mentioned:

4. 1. At present, the management inventory data that were used to calculate the possibilities of *P. elata* for each concession have not yet been translated into harvesting rules in most cases. These rules are established by provisional management plans for a transitional period of four years, during which development plans are to be drawn up (cf. section 3.2). However, management rules for the population of *P. elata* are currently defined by the NDF, which is a major element of development plans for the species. Yet, it is essential to draw up and implement development plans. The development plans of 3 concessions were submitted in 2014 or 2015 and more development plans are expected to be submitted before the end of 2015 or early in 2016.

5. 2. During the making of the 2014 NDF, ongoing planning based on ACIBOs (ad hoc lumber felling licences) was irrelevant from the sustainability point of view, especially as there was no link between the ACIBOs granted and the annual allowable cuts, which should also be established on the basis of development restrictions (volumes / trees concerned / surface areas), which is not the case in the framework of the implementation of provisional management plans. The new regulations implemented since July 2015 provide for industrial logging permits whose surface matches that of the annual allowable cut provided that the company submits jointly with the permit application an annual operational plan specifying the number of inventoried trees that are harvestable, their location and the equivalent volume.

6. 3. The ACIBOs are routinely granted beyond the deadline specified in the regulations (31 December of the previous year, according to Ministerial Order 011 of 12 April 2007). However, reminder letters have been sent to companies to remind them of their legal obligation (i.e. to submit their applications no later than 30 September of the previous year) to allow the Government to review the applications and grant the permits within the regulatory timeframe.

8.3 Future prospects

8.3.1 Validation of the inventories

Since in most cases the quota is calculated using inventory data which have yet to be approved by the Government, it is recommended that as part of the validation process, an audit is carried out on all or part of one of six inventories on which the approach is based, in order to confirm (*i*) the overall quality of the inventories and (*ii*) the apparently favourable population structures in the concessions concerned (regeneration/abundant crop trees).

It should be noted that the results of management inventories have been validated for 7 concessions with field controls in particular. As regards inventories of *P. elata*, a control has been organized in each concession having submitted an inventory report and a control of this mission has also been conducted by the scientific representative of CITES in the Congo Basin.

For concessions that have development plans in place, quotas are defined on the basis of harvest inventory data. As mentioned above, *P. elata* is a gregarious species; as such, its density can vary greatly between one year and the next and especially over a 25-year period. This can lead to considerable variations in the quotas allocated to each company every year. This makes it even more important for the Government to validate the harvest inventory data for the concessions concerned.

8.3.2 Diameter growth and natural mortality

When calculating the recovery rate, the strength of the matrix model is its capability to take into account the growth and natural mortality of each of the diameter classes.

In a similar vein to the comments on population structure, the observed differences in growth between geographically distant populations would be an argument in favour of installing equipment in the concessions (or groups of concessions) according to consistent criteria (including soil and rainfall) to refine the estimates, particularly of the recovery rate.

When the annualised natural mortality rate is not known for a given location, foresters use an average

reference value of 1.00% of trees (SPIAF, 2007). This value is used in development plans throughout the region. The high variability found in the literature (0.60 to 1.00%), coupled with the benefit of knowing the mortality for each diameter class when the recovery rate is estimated by the matrix method (Picard *et al*., 2008a; see also section 4 and Appendix 1) would require setting up a mechanism to measure this parameter as accurately as possible. This step can be considered in conjunction with monitoring of tree growth of the species (Picard *et al*., 2008b).

8.3.3 Phenology and support for natural regeneration

The high variability of the estimate of the diameter of regular fructification observed in the scientific literature (30 to 37 cm depending on the source) and its relevance to forestry management show how important it will be to develop phenological studies over time in forest concessions in the DRC. Furthermore, no such scientific study has been performed within stands present in Equateur province to rigorously determine the diameter of regular fructification.

To compensate for the more or less severe lack of natural regeneration of the species throughout its natural distribution area, pragmatic reforestation programmes could be implemented. These programmes should include (*i*) the harvest of healthy seeds, (*ii*) the maintenance of the germination capacity of seeds, (*iii*) the nurturing of seedlings in nurseries, (*iv*) the preparation (clearing) of sufficiently open rehabilitation zones (at least one hectare in one piece) to meet the species' light requirements, and (*v*) transplantation of the most vigorous seedlings to these zones during the rainy season. In this context, research should be conducted to develop pragmatic and technically and financially viable reforestation methods that can be implemented by forestry companies. Another avenue for research could be the development of measures to promote better natural regeneration. It should be noted that forestry companies pay a reforestation tax that should allow the State to reforest areas through the National Forest Fund.

Finally, a study of the seed predators of the species should be carried out. This study would confirm/refute the observations that beetles of the genus *Exechesops* sp. are present in the stands of *P. elata* located in Orientale province (to be confirmed for Equateur province), as well as the potential impact (if any) of this predator on the regeneration strategy of *P. elata* in the Congolese context.

CASE OF TREE ON 2014 ANNUAL CUTTING AREA CUT DURING 2015
SUPPLEMENT OF NON-DETRIMENT FINDING OF *PERICOPSIS ELATA*

The new system of quota's estimation and monitoring, stated in the Non-Detriment Finding (NDF) prepared by DRC in August 2015, is not yet approved. This system could be approved in future by a new decision, improving the resolution Conf. 14.7 (Rev. CoP15), as, at moment, those two systems are discordant.

At moment, the CITES procedures defined by resolution 14.7 are supposed to be still applied. According to this resolution, annual quota are associated with felling year of trees, whereas NDF suggest that quota, starting from 2015, will be linked with opening year of Annual Cutting Area (ACA).

The discordance between these two systems of estimation and monitoring of quotas, make difficult the management of trees felled and harvested during 2015 on 2014 Annual Cutting Area. In fact, the 11th article of Ministerial Order n 36 of 2006[4] establishes that it's possible to cut trees on the same ACA the next year after the opening one base on an extended Annual Cutting Permits (ACP[5]).

For now, waiting for a modification of 14.7 resolution that should be endorsed only in 2016, those trees, harvested on the basis of permits extensions in accordance with Congolese law and sustainable management, can be exported neither 2014 residual quota according 14.7 resolution (as they are harvested during 2015), nor 2015 quota proposed in NDF (as they are harvested on the basis 2014 ACA). In fact, the 2015 quota, estimated in 28th November 2014 letter and the August 2015 revised edition of the NDF, is based on the new system of estimation link with ACA (and no the felling year), and so can't take permits' extension into account.

It is therefore proposed to update 2015 quota to include the trees concerned (only society with extension of the 2014 ACP for 2015 year). So, in this case, resolution 14.7 measures keep going in 2015, pending the approval of those proposed in the NDF. With this decision, NDF's measures can be applied as soon as they will be approved.

In this context, the special case of companies that have been benefiting from 2014 ACP extension, need to be studied, in order to estimate the concerned volume. In particular, only the company COTREFOR is concerned by this special situation.

The Annual Operational Plan (AOP), submitted to Forest Administration the 15th November 2014 by COTREFOR, state that 2014 ACA would be subject of a extension application to 2015, as it will be impossible for the company to complete the gathering of all trees before the end of the year due to a lack of resources and consequent delays of harvest operations. So, in accordance with 2015 AOP and a justified application, COTREFOR has obtained the permission to continue to cut tree in 2014 ACA, during 2015.

2015 Annual Operational Plan state that:

"Regarding to Afrormosia CITES quota, th it must be noticed that the volume that might be exported in 2015 would be the volume cut on 2015 Annual Cutting Area (first ACA of first five-years management plan) and 2014 Annual Cutting Area (fourth ACA of four-years temporary management plan).

The Map 1 shows the location of trees still stand the 31st December 2014, and likely cut in 2015.

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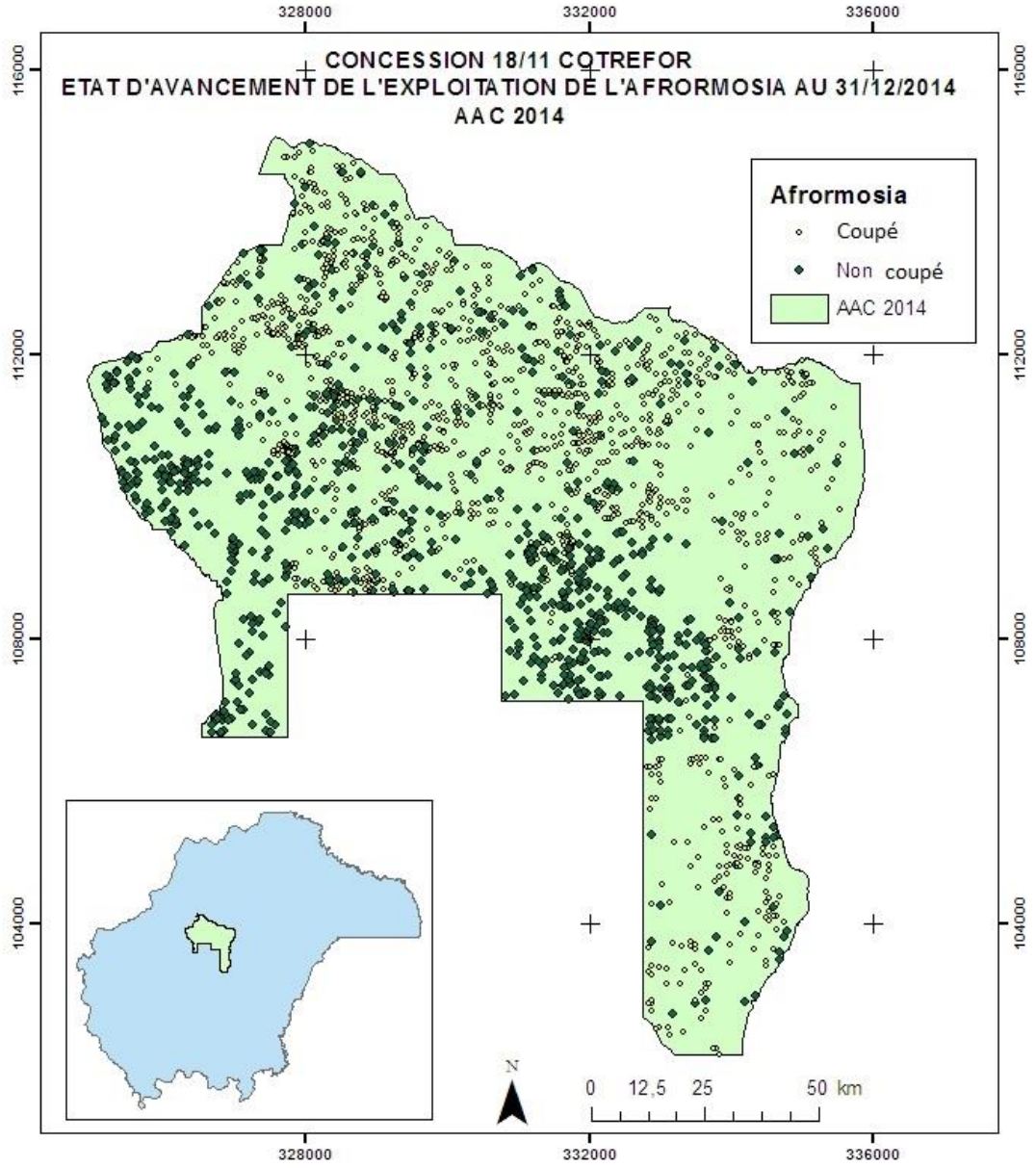
[4] *Ministerial Order was in effect to the end of first semester 2015. It is modified by Ministerial Order n°34 of 3rd July 2015. Article 28 allow from now on three year to cutting down the tree on Annual Cutting Area, just as said in the NDF.*

[5] *ACIBO = Autorisation de Coupe Industrielle de Bois d'Œuvre that is to say ACP = Annual Cutting Permit*

Map 1 : Progress of Afrormosia felling dated 31st December 2014 for 2014 Annual Cutting Area



During the first semester 2015, COTREFOR has cut 3,139 m³ on 2014 ACA[6], on the basis of those ACP's extension. After that, COTREFOR decided to stop definitively to harvest of Afrormosia in this ACA, to grant a better regeneration of this specie.

Finally, the volume, which will be exceptionally added to 2015 quota to export t felled during 2015 in 2014 ACA, is 3,139 m³ (valid for COTREFOR company, concession n°18/11-Alibuku).

[6] *All the volume in this note are in round wood equivalent*

Tableau 1: Cutting history in 2014 ACA of 18/11-Alibuku concession attributed to COTREFOR

	Volume (m^3)
Volume allowed by 2014 ACP	**21,245**
Cut trees between 28th February (2014 ACA' opening) to 30th September 2014 (2015 AOP' submission)	9,622
Cut trees between 1st October to 31st December 2014	2,972
Cut trees during 2015	3,139
Trees whose will never be cut by COTREFOR	5,512

The export quota allocate to forest concession in the Afrormosia area for 2015 ACA is revise like that:

Society	Concession (n° CCF)	2015 Quota revised in NDF (m^3)	Quota with the trees cut in 2014 ACA during 2015 year
COTREFOR	018/11	8,703	11,842
CFT	046/11	1,387	1,387
CFT ex-SODEFOR	047/11	445	445
FORABOLA	042/11	2,513	2,513
SODEFOR ex-CFT	059/14	0	0
SODEFOR ex-FORABOLA	064/14	1,352	1,352
SICOBOIS	033/11	271	271
SIFORCO	052b/14	8,461	8,461
SIFORCO	054/14		
SIFORCO	053/14		
SODEFOR	036/11	1,121	1,121
SODEFOR	037/11	7,652	7,652
TOTAL		**31,905**	**35,044**