CAMEROON ON THE BRINK

COCOA'S NEW DEFORESTATION FRONTIER

MIGHTY EARTH

JULY 2025

COCOA

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EXECUTIVE SUMMARY

Cameroon is emerging as the new frontier for cocoa production—and with it, a critical hotspot for cocoa-driven deforestation. As traditional producers like Côte d'Ivoire and Ghana face declining yields and depleted forests, multinational cocoa companies are expanding operations in Cameroon, where forest coverage remains relatively high. However, this expansion is triggering widespread forest loss. Since 2020, Cameroon has lost over 781,000 hectares of forest, half within cocoa-growing regions. In some subdivisions, forest cover has declined by more than 40% in the past five years.

Using satellite imagery, spatial analysis, and field investigations in Nkondjock, Yabassi, and Njombe, this report finds that cocoa-driven deforestation is ongoing and, in many cases, if nothing changes, could violate the EU Deforestation Regulation (EUDR). Cocoa farms established after the EUDR's 2020 cutoff are producing beans that enter global supply chains via informal intermediaries known as coxeurs. These intermediaries—who often pay farmers in cash and operate without documentation—are a dominant force in Cameroon's cocoa trade but pose major challenges to traceability and sustainability.

Traceability systems remain fragmented, often only tracing cocoa back to the cooperative level or licensed buying agent (the "direct" supply chain), thus failing to capture the activity of coxeurs and the farms that they buy from (the "indirect" supply chain). Accelerated, in no small part, due to the upcoming implementation of the EUDR in 2026, some companies are taking positive steps to address gaps in traceability. Barry Callebaut and Telcar are mapping their cocoa supply chains in excess in Cameroon to try and capture the indirect supply chain. In practice, that means mapping more farms than those they actually buy from. Both companies have systems in place to monitor deforestation, as well as tools to trace cooperatives and the license buying agent, and Barry Callebaut is deploying yield control mechanisms which indicates the maximum yield likely to be produced in a given area. Regulations such as the EUDR have already played a crucial role in fast-tracking these efforts, and in creating a level playing field for cocoa and chocolate companies across Europe. The EUDR may be coming just in time to help Cameroon avoid the ecological collapse seen in West Africa.

To meet the demand for deforestation free cocoa, the cocoa industry has a clear roadmap to follow. This includes full farm-level traceability, transparent reporting on deforestation risks, and meaningful financial support to farmers. Coxeurs must be integrated into formal sourcing systems, and cooperatives must be empowered to offer competitive, timely payments. Simultaneously, the Cameroonian government should regulate informal actors, promote cocoa cultivation only on degraded lands, and invest in rural development strategies aligned with forest conservation. The EU has a critical role to play in enforcing the EUDR and supporting implementation in high-risk countries like Cameroon. Cameroon's cocoa sector stands at a crossroads. Without systemic reforms, forest loss will accelerate. But with collective action, Cameroon can become a model for sustainable cocoa production that protects forests and empowers farmers.

I. INTRODUCTION

Historically, global cocoa production has been heavily concentrated in Ghana and Côte d'Ivoire, which together have dominated international markets for decades. However, productivity among cocoa producers in these traditional hubs has steadily declined due to aging plantations, soil degradation, and limited access to agricultural technologies and resources. Meanwhile, climate change is altering environmental conditions, gradually shifting the suitability of established cocoa-growing landscapes and exacerbating vulnerabilities to pests, diseases, and unpredictable weather patterns. As Ghana and Cote d'Ivoire struggle to keep up with rising global demand, the cocoa industry is increasingly turning to emerging producing markets nearby, particularly Cameroon, Nigeria and Liberia, which have the right agro-climatic conditions for cocoa production.

Unfortunately, growth in the cocoa sector has, to date, been largely synonymous with the clearance of tropical rainforests, largely by smallholder growers. These farming households generally earn only a fraction of the value of the cocoa beans they harvest, with most of the profits concentrated in the hands of international cocoa traders and their downstream customers in the chocolate industry. Cocoa driven deforestation not only threatens forests and biodiversity, but also undermines local food security by displacing food crops, reducing agrobiodiversity and increasing dependence on volatile cocoa income. It can also disrupt local rainfall patterns and trigger soil degradation.

This report provides new evidence on the impact of the expanding cocoa frontier in Cameroon, a country now poised to become a major global supplier. Using remote-sensing datasets, local field verification, and interviews with farmers, we examine the extent to which cocoa-related deforestation is ongoing, and the extent to which corporate sustainability programs have successfully included smallholder farmers—especially in the indirect supply chain.

The objectives of this study were to:

- pinpoint active deforestation in areas of high conservation and biodiversity value in Cameroon;
- examine the link between forest loss and new cocoa farm expansion in these areas, through the use of both satellite monitoring data and field investigations;
- assess the effectiveness of local cocoa traceability efforts by private and public sector actors, and;
- help companies and cocoa growers improve their ability to comply with regulations like the EU Deforestation Regulation (EUDR), and to deliver more equitable outcomes for farmers.

Our findings show that while traceability initiatives are advancing, in large part thanks to the EUDR, deforestation for cocoa is ongoing and widespread in some regions. We also find that many farmers—particularly those selling via informal intermediaries known as coxeurs—remain excluded from sustainability programs. While these indirect suppliers present serious challenges to traceability and corporate accountability, the EUDR is coming into force just in time to help push along efforts to address the true environmental footprint of cocoa production.

Ultimately, our research highlights the urgent need for cocoa companies to build on some of the initiatives already in place; and continue to take practical steps to improve supply chain transparency; pay farmers more directly and fairly; and work together (and with government agencies) to invest in the infrastructure needed to build a truly deforestation-free cocoa sector in Cameroon.

I. METHODOLOGY

Understanding where and how deforestation is occurring, and whether farmers are being meaningfully included in traceability systems, requires independent verification using both geospatial analysis and field-based evidence. This section outlines our approach to investigating these questions, combining satellite-based deforestation alerts, spatial analysis of cocoa suitability zones, and direct engagement with cocoa-farming communities in high-risk areas.

In the first phase of our analysis, we identified subdivisions[1], where biodiversity is most at risk from cocoa-driven land use change, using recently published remote sensing datasets. We used the high cocoa suitability and accessibility dataset developed by Kamath et al. (2024), which assigns a 0–1 availability and cocoa suitability score to 1 km × 1 km pixels across the Congo Basin. Given Cameroon's goal to "triple cocoa production volume by 2030" (Kamath pg. 1), the dataset highlights how cocoa expansion could drive land-use change, particularly in forested and biodiverse landscapes.

This dataset was constructed using a spatial exclusionary approach to identify areas where cocoa cultivation is climatically feasible, while accounting for key land-use constraints such as protected areas, urban zones, and topography suitability. The model employs a random forest classifier trained on global cocoa occurrence data, enabling a high-resolution assessment of potential expansion under current climate conditions. Additionally, by incorporating road networks and market proximity, the dataset accounts for economic accessibility, providing a projection of future cocoa expansion zones.

For our study, we selected subdivisions with an average cocoa suitability score above 0.5, ensuring we direct focus to areas with high cocoa production potential. This threshold allowed for

[1] Cameroon is divided into 10 regions, which are further subdivided into 58 divisions (also known as departments). These divisions are then broken down into subdivisions, locally referred to as arrondissements. There are 374 subdivisions across the country.

a targeted assessment of regions where cocoa expansion is most likely and most likely to impact biodiversity. These subdivisions[2] are mapped below.

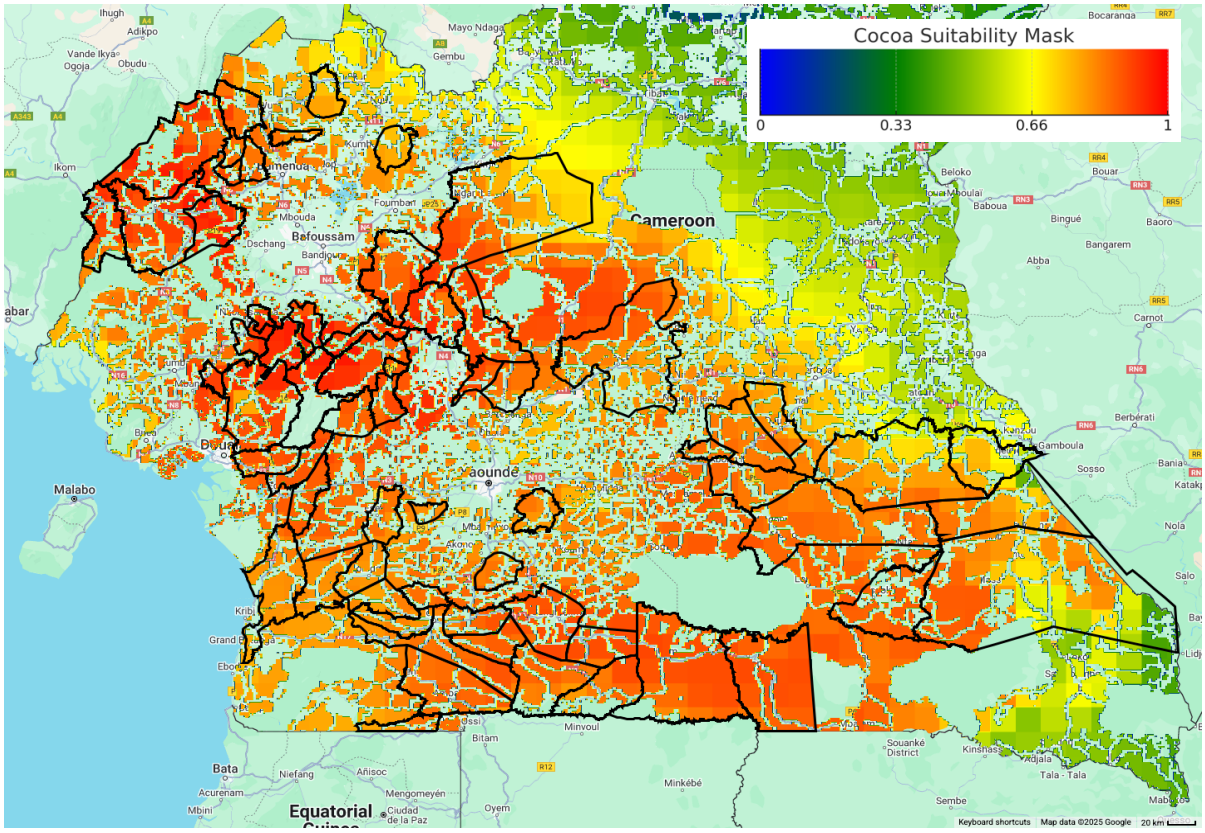


Figure 1: Map of Cameroon's subdivisions with average cocoa suitability score higher than 0.5

To pinpoint the subdivisions most likely to reveal deforestation linked to cocoa expansion in a ground investigation, we used RADD alerts from 2020 onward to quantify forest loss within the selected arrondissements. We summed all RADD alerts[3] within each district and normalized the data by dividing total hectares of forest loss by the district's total area (sq km), creating a deforestation density metric that identified the areas experiencing the highest concentration of recent forest loss[4]. We also drew on research from Trase to ensure that the areas of interest were located near, or within 50km of a cooperative.

[2] We used Level 3 administrative boundaries from the Humanitarian Data Exchange (HDX) dataset for Cameroon to align our analysis with local governance units relevant to land-use planning. These boundaries represent arrondissements, or local subdivisions in Cameroon. To identify high-risk subdivisions, we calculated the average cocoa suitability score within each boundary using the Kamath et al. (2024) dataset and selected those with a mean score above 0.5.

[3] RADD alerts, generated from Sentinel-1 radar data, detect abrupt changes in forest canopy structure, enabling the identification of tree cover disturbances even under persistent cloud cover. It is important to note that not all alerts indicate deforestation; some may capture temporary disturbances such as treefall from natural phenomena.

[4] We should note that, by normalizing forest loss by total district area rather than forest cover, our approach may underestimate deforestation intensity in subdivisions with less remaining forest.

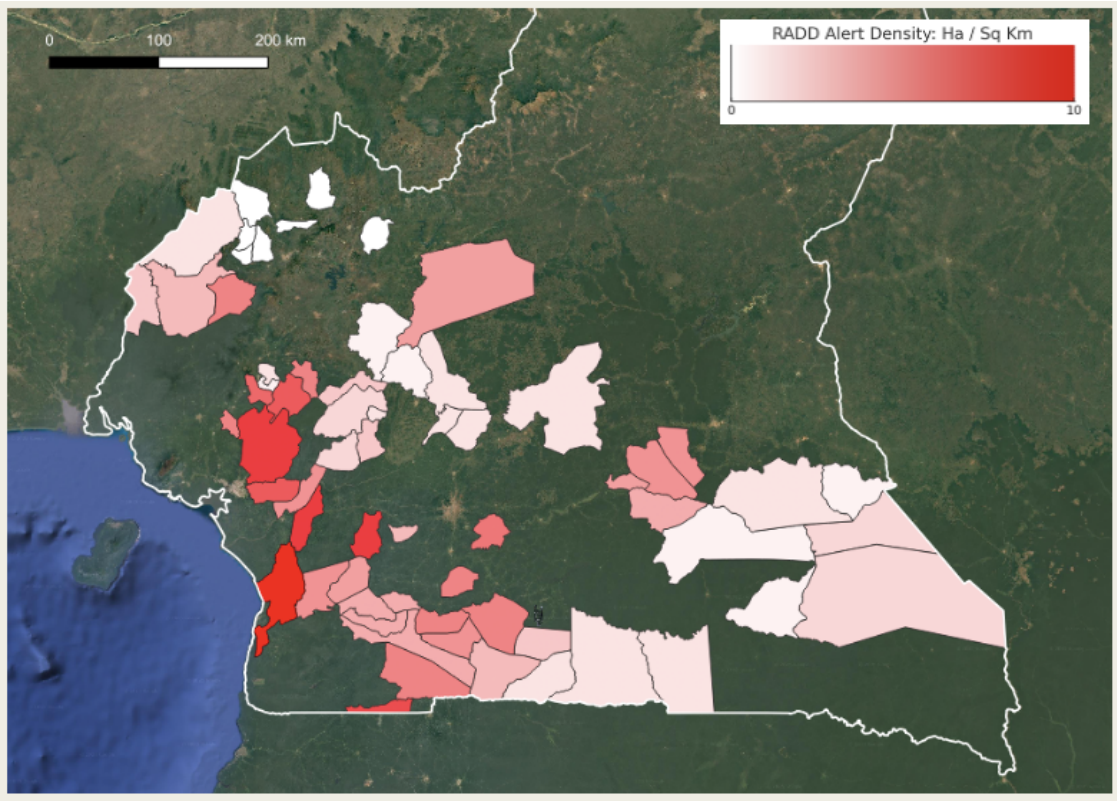


Figure 2: Map of forest alert concentration within Cameroonian subdivisions that are highly suitable for cocoa

To refine our assessment within priority subdivisions, we deployed the Forest Data Partnership's Cocoa Probability Model to Cameroon, expanding beyond the published maps for Ghana and Côte d'Ivoire. This 10-meter resolution model[5] assigns a cocoa probability score (0–1) to each pixel, allowing us to identify areas with the highest likelihood of cocoa cultivation by filtering for pixels with a score close to 1. To direct our ground-truthing investigation, we identified the intersection of high-probability cocoa pixels (≥ 0.8) and RADD alerts, pinpointing areas where recent forest loss is most likely linked to cocoa expansion. Finally, we further refined our target areas by selecting only locations within 1–2 km of a major road to ensure feasibility of access for field investigators. This process yielded 29 GPS locations to direct ground-truthing within the Yabassi, Knondjock, and Njombe-Penja subdivisions. We have intentionally left the exact GPS coordinates of these locations out of our report in order to protect the privacy of smallholder farmers.

Our field verification mission was carried out by a team of four researchers over a ten-day period. To guide interviews, we used a structured questionnaire jointly developed by Mighty Earth and CODED, which was digitized through the KoboCollect platform. This questionnaire directed the team to conduct interviews with cocoa producers, coxeurs, cooperative and GIC managers, and

[5] Built through a community-driven approach, the model integrates over 3 million training samples from diverse sources, including mapped cocoa plots from WRI, land cover data from BNETD-CIGN, agroforestry inventories from CIRAD, and field surveys from COCAFORI. The training data were split for model optimization and validation to ensure high accuracy in distinguishing cocoa from non-cocoa areas.

local company representatives. Field investigators were equipped with two Garmin GPS devices, notepads, and machetes, while local guides were recruited in some cases to facilitate access and navigation through village forests. For security and transparency, the team met with representatives of the Ministry of Agriculture and village chiefs in each area to formally announce our presence and explain the purpose of the mission. To facilitate access to difficult-to-reach locations, we rented a 4x4 vehicle and used motorcycles adapted for difficult terrain when necessary. Our observations and activities were documented using smartphone cameras, resulting in over 147 photographs and 7 videos—many of which were geotagged using GPS-enabled devices to enhance spatial accuracy in our reporting.

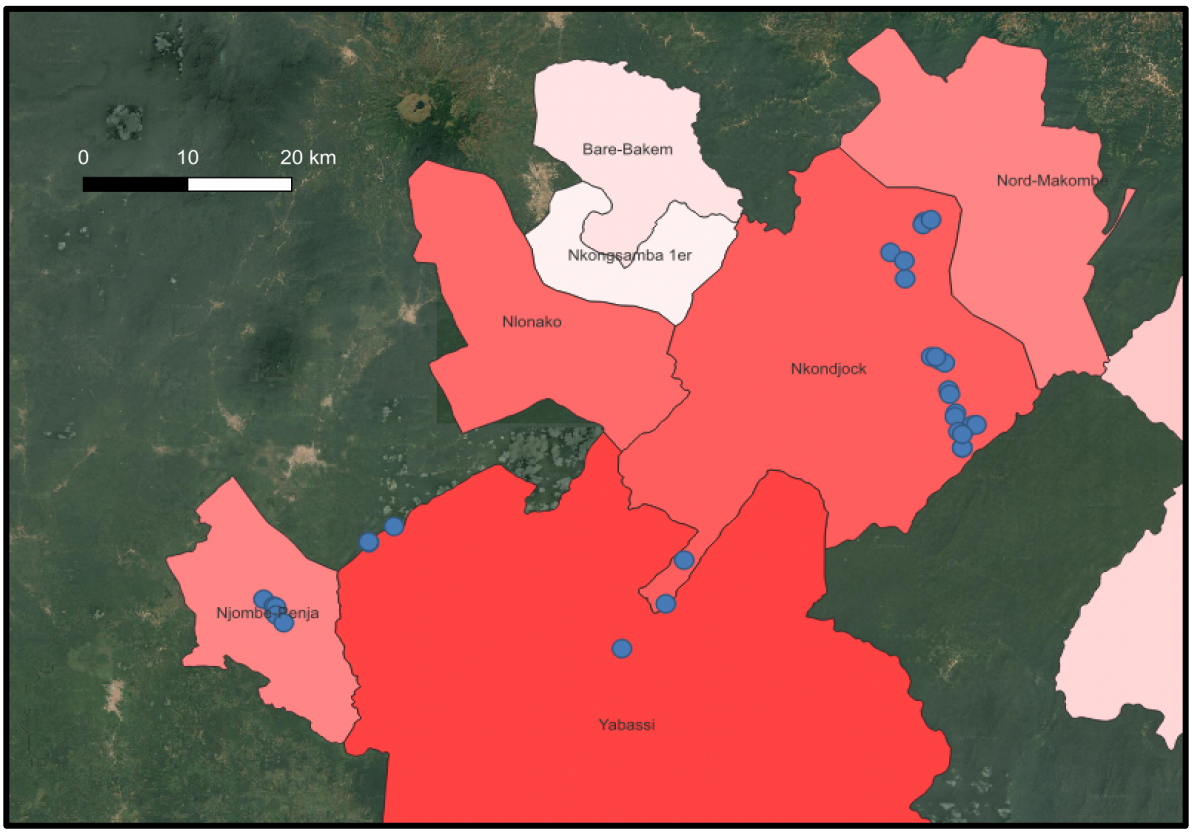


Figure 3: Map of selected locations for ground investigation within cocoa expansion subdivisions; exact GPS coordinates removed to protect farmer privacy.

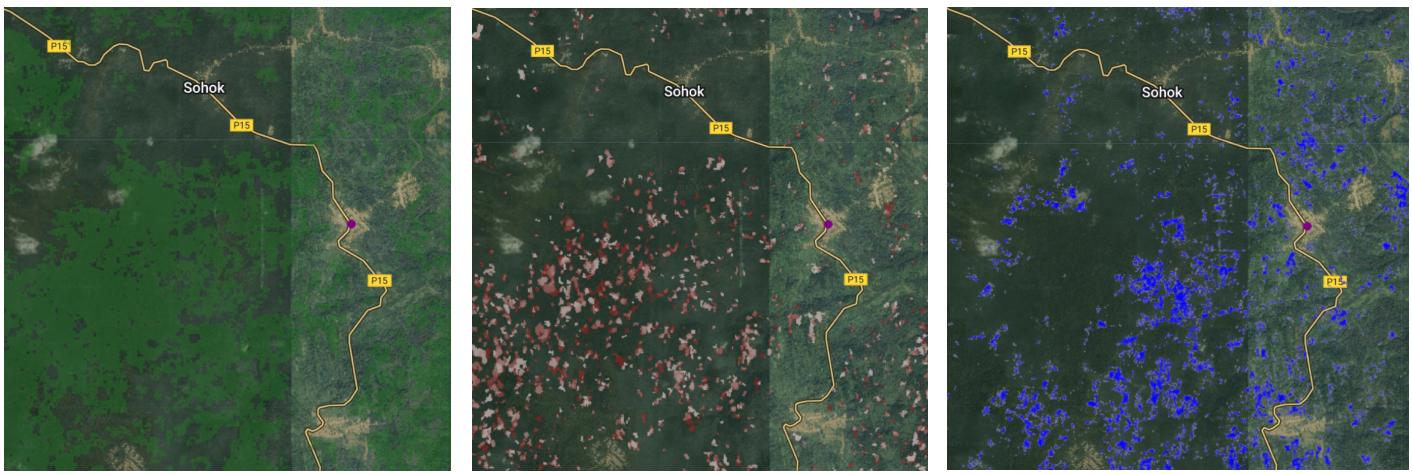
Source: Mighty Earth

The results of our field mission highlight both the strengths and limitations of our site selection methodology. Detailed findings from each of the three regions we visited are presented in the following sections of this report, but our high-level results are summarized here. Of the 29 GPS-selected locations, 4 were inaccessible due to physical barriers such as mangrove overgrowth or impassable streams—highlighting the difficulty of accurately assessing ground accessibility through remote sensing alone. Of the remaining 25 accessible sites, 21 were confirmed to be active cocoa plantations, yielding an 84% accuracy rate for our predictive model. The 4 misclassified sites were instead planted with

other crops (palm oil or plantain) or left as open, uncultivated land. While traveling to and from the pre-selected locations, our field teams identified 10 additional cocoa plots established on land that appeared to have been recently cleared.

These findings, reinforced by interviews with local producers, provide clear evidence that cocoa-driven deforestation remains ongoing in the areas we surveyed. The accuracy of RADD forest loss alerts in guiding our spatial exploration suggests that significant forest clearance has occurred in these subdivisions since 2020. Moreover, the fact that this deforestation and subsequent cocoa planting is taking place in areas identified by the Kamath et al. (2024) high-suitability model confirms the predictive value of their spatial analysis—and raises concerns about the future of forest and biodiversity loss in cocoa-prone regions.

Mighty Earth's Cocoa Accountability Map collates these data layers to reveal general trends in forest lost and cocoa expansion across Cameroon. See the example below from a cocoa growing region near Sohok, Littoral Province, Cameroon.



From left to right: 2019 Forest Baseline Map (green); High Confidence RADD alerts since 2019 (red); FDP Cocoa Prediction (Blue) *Source: Mighty Earth Cocoa Accountability Map*

3. CAMEROON

3.1 Shifting patterns of cocoa deforestation in Africa

Cameroon is currently the world's fourth-largest cocoa producer and still retains approximately 40% of its land as forest. However, the country has set an ambitious goal to triple cocoa production by 2030. Given that crop yields are unlikely to triple by 2030, achieving this target is significantly increasing pressure on natural forests and other ecologically sensitive areas; this is reminiscent of the cocoa booms that Côte d'Ivoire and Ghana experienced in past decades, which were accompanied by extensive deforestation.

Côte d'Ivoire's cocoa boom came at the cost of over 80% of its forests being cleared over several decades, and Ghana has also seen widespread cocoa-driven encroachment into parks and forest reserves. In these countries, new land for cocoa is now scarce and often illegal (e.g., in protected areas). By contrast, in Cameroon the presence of remaining forest – especially in the South and East regions – means there is a great deal of potential land to expand into, making it a new frontier for cocoa cultivation. The environmental NGO Fern warns that the "acute problems" seen in Côte d'Ivoire – such as severe forest loss and farmer hardship – could spread "like a contagion" to Central African countries if cocoa production explodes without safeguards. to Central African countries if cocoa production explodes without safeguards.

During the 2023-2024 cocoa season, the price of cocoa in Cameroon **surpassed CFA5,000**, reaching CFA 6,000 in some areas. The price still remains significantly higher than that of its cocoa producing counterparts in West Africa, sitting at over double the price set in Ghana and Cote d'Ivoire. Though this wealth is unevenly distributed across the supply chain, these elevated prices provide further incentives for the industry and cocoa plantations to expand in Cameroon.

While deforestation in the Congo Basin has historically been low compared to other tropical forest landscapes, Cameroon's cocoa industry has expanded rapidly: production "more than doubled between 2002 and 2017, reaching 295,000 tonnes" and the "increase was mainly due to the expansion of harvested area, which also doubled in the same period". This agricultural expansion has coincided with rising deforestation levels. Data from Global Forest Watch demonstrates a steady increase in tree cover loss across the country since the early 2000s. In 2023, primary forest loss reached its highest level on record—over 103,000 hectares—representing an order of magnitude increase compared to just 9,970 hectares in 2003.

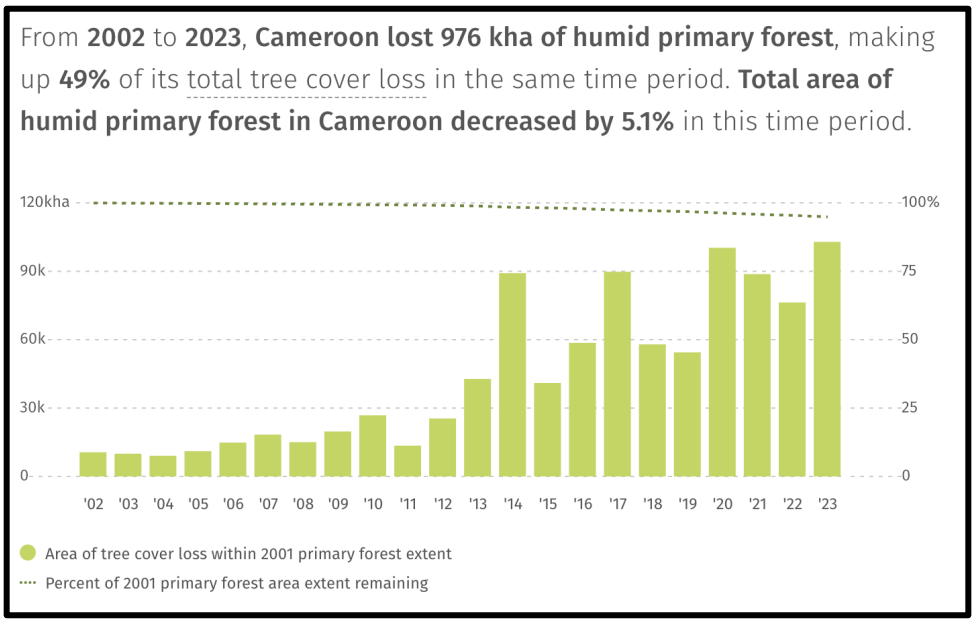


Figure 4: Primary Forest Loss in Cameroon between 2002- 2023.
Source: Global Forest Watch

The Ivorian and Ghanaian governments historically supported cocoa expansion, but recently they have shifted toward yield intensification over expansion – partly due to international pressure to halt deforestation. Cameroon's policy statements today try to fulfill both objectives at once: the country seeks to "simultaneously double national cocoa production… and reduce pressure on forests." For example, the new partnership with the Central African Forest Initiative (CAFI) will invest $60 million to "fund the development of cacao… as well as protect the country's forests," by focusing on raising yields on existing land rather than clearing forests. The effectiveness of this remains to be seen, and experts in the industry question whether production can truly be increased without significant forest loss.

3.2 The TRIDOM landscape

One landscape that clearly highlights what's at stake is the TRIDOM region—a vast, ecologically rich forested area straddling southeastern Cameroon, northeastern Gabon, and northwestern Republic of Congo. Home to an extraordinary range of biodiversity, including forest elephants, western lowland gorillas, buffaloes, giant forest hogs, sitatunga, and pythons, TRIDOM's relatively intact forests and proximity to key reserves like Dja, Ngoyla, and Kom make it a vital area to watch. Although our report does not focus specifically on this region, recent research by Kamath et al. (see Methodology) identifies large portions of TRIDOM as highly suitable for cocoa expansion. Alarmingly, deforestation in the area has been steadily rising, with 11,009 hectares forest loss detected in 2020, and over 6,000 hectares of forest loss alerts detected annually since 2020 (see Figure 2).

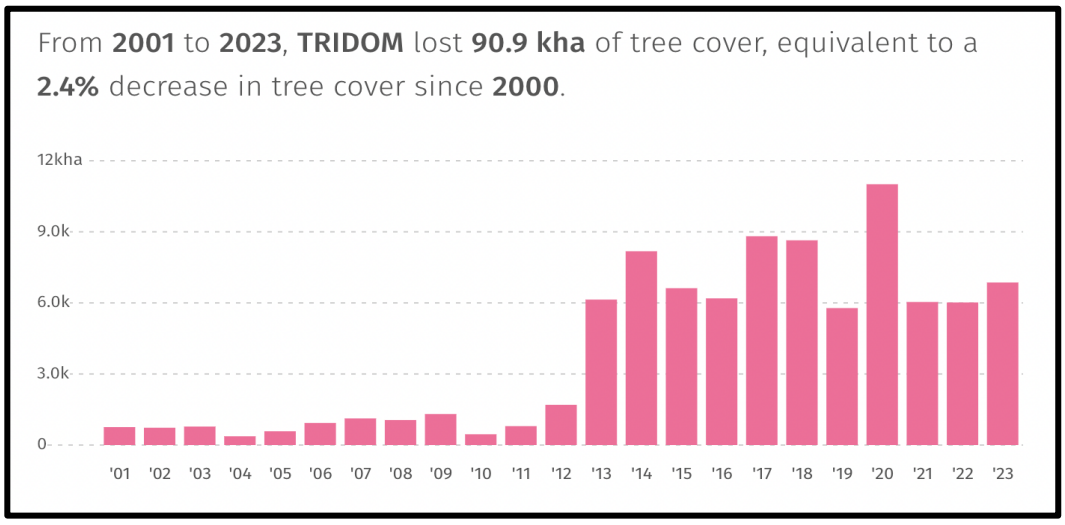


Figure 5: Tree cover loss in TRIDOM region between 2001-2023.
Source: Global Forest Watch

Remote sensing analysis show that forest loss is particularly concentrated near Dja Faunal Reserve and Ngoyla Wildlife Reserve (see Figure 3) – areas where cocoa suitability and forest cover significantly overlap. Figure 4 indicates areas within and surrounding the TRIDOM area that are suitable for cocoa production according to the Kamath et. al dataset. Areas in green have some suitability, whereas areas in yellow, orange and red have a higher suitability for growing cocoa. This assessment does not show the suitability of cocoa production within the four national parks indicated on the map. Without adequate forest protection, Cameroon's expanding cocoa industry poses a risk to these areas of rich biodiversity that have a potential to be converted from forests into plantations.

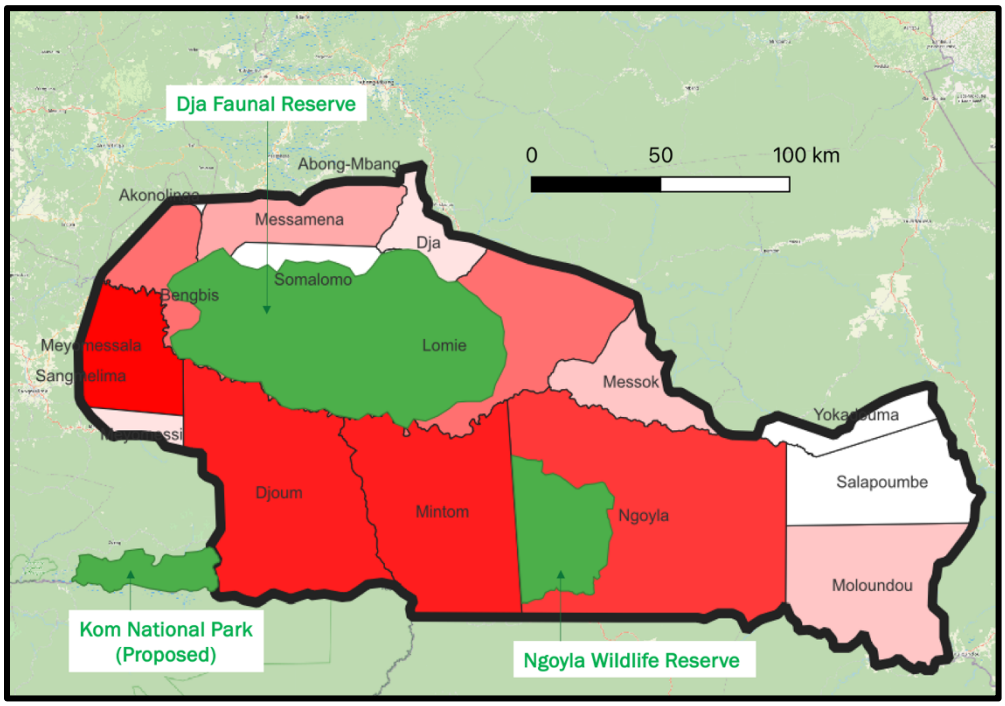


Figure 6: Primary forest loss in the TRIDOM landscape 2020-2025, according to RADD alerts.

Source: Mighty Earth (2025)

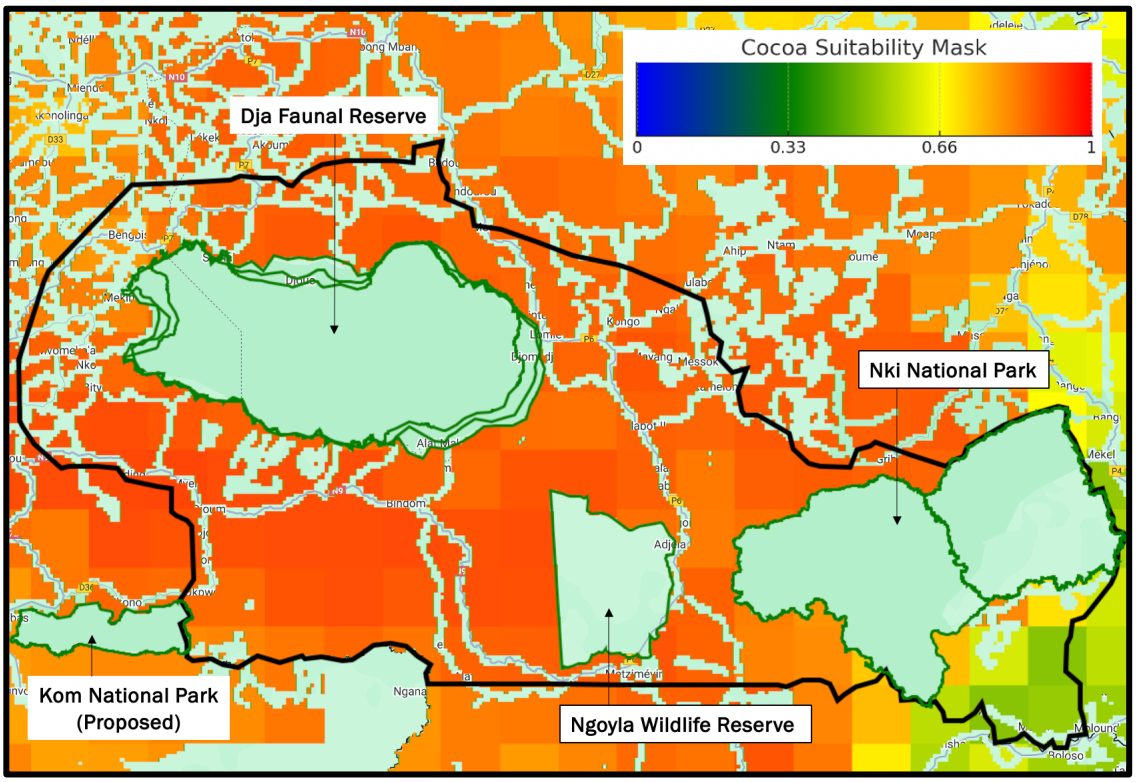


Figure 7: Map showing areas suitable for cocoa production within the TRIDOM landscape

Source: Kamath et al. Cocoa Suitability Map

3.3 Industry and legislative Initiatives

Over the past decade, virtually all major cocoa traders–companies like Cargill, Barry Callebaut, and OFI– as well as chocolate manufacturers such as Hershey's, Godiva, and Nestlé – have published zero-deforestation commitments. Each company has announced policies vowing not to source cocoa from newly deforested land and to achieve deforestation-free supply chains, many by 2025 or earlier. A number of these pledges were encapsulated in the 2017 Cocoa & Forests Initiative (CFI), a partnership in which companies and the governments of Côte d'Ivoire and Ghana (later joined by Colombia) "committed to working together, pre competitively, to end deforestation and forest degradation in the cocoa supply chain."

Although Cameroon was not initially a part of the CFI, the industry's 2017 "Statement of Intent" did include commitments to work pre-competitively to halt deforestation in all sourcing areas, and, in Cameroon, this spirit was carried forward by initiatives like the Roadmap to Deforestation-Free Cocoa (facilitated by IDH in 2019) where companies operating in Cameroon, including Barry Callebaut, Telcar (Cargill), and Neo Industry, similarly pledged to eliminate cocoa-related deforestation. As a result, the industry and local government have agreed to develop a national traceability system for cocoa, including a satellite-based deforestation monitoring system to help identify deforestation for cocoa, in order to drive down the demand for cocoa linked to forest loss.

CAMEROON'S MAJOR COCOA TRADERS

Major cocoa companies operating in Cameroon include Cargill/ Telcar, Barry-Callebaut, Hershey, Mars, Ecom, ETG, Olam Cam. In the 2023-2024 season, Telcar held the largest share of the cocoa export market with 35.1%, followed by Olam Cam with 24.9%, and Sbet with 9.88% of the export market. Over 80% of Cameroon's cocoa is destined for Europe, with most beans passing through the Netherlands then re-exported to other European countries as a raw material or as processed cocoa products. Manufacturers then process cocoa beans into cocoa powder, chocolate bars and other cocoa based food and drinks products before selling them via retailers and supermarkets to consumers. Cameroon's major traders have supply chain links to some of the world's most well-known chocolatiers such as Nestlé, Mars, Unilver and Mondelez (owner of brands: Cadburys, Milka, Toblerone and more).

Each of these traders, manufacturers and retailers has a duty to address environmental and social issues linked to their supply chains, including preventing deforestation and addressing farmer poverty.

Beyond commitments by businesses and producing countries, the public sector in consuming countries is also seeking to address deforestation. In particular, the EU's Deforestation Regulation (EUDR), which was adopted in 2023 with the aim of ensuring products sold in the EU are "deforestation-free," will significantly influence the Cameroonian cocoa industry, as the EU is Cameroon's biggest cocoa buyer: in the 2023/24 season, over 80% of Cameroonian cocoa exports went to Europe. Upon implementation in January 2026, the legislation stipulates that any beans or cocoa products entering the EU must be traceable to their plot of origin and proven not to come from land deforested or degraded after December 31st, 2020. Companies importing or exporting cocoa to the EU will be required to collect precise information on farm geolocation, deforestation-free status, and legal compliance (under Cameroonian laws).

Major cocoa traders, including Barry Callebaut, have come out in support of the legislation, indicating the role it will play in improving sustainability across the cocoa sector:

> *"For the past three years, Barry Callebaut - and many of our customers - have been a strong advocate for this vital legislation in its current form as we believe it is our responsibility to lead efforts in halting deforestation and advancing sustainable farming practices throughout our supply chain - all the way from farmers to our customers."*
>
> *– Barry Callebaut, November 2024*

In order to prepare for the upcoming regulation, Cameroon's cocoa and coffee association (CICC), together with six cocoa exporters, has developed an initiative to share location data, allowing buyers in the EU to request and receive coordinates of plantations belonging to cocoa farmers in their supply chain. Such collaboration is a positive step, and while experts are optimistic that the EUDR will play a positive and crucial role in reducing demand for deforestation cocoa in the coming years, many worry that companies still need to do more in emerging markets like Cameroon to develop full supply chain traceability and to educate farmers in both their direct and indirect supply chains about how to comply with the legislation.

3.4 Recent deforestation trends in Cameroon

The deforestation rate in Cameroon has picked up pace in recent years. Since 2020, RADD alerts (radar-based satellite alerts that detect forest disturbances in near-real-time) have recorded 781,797.7 hectares of forest loss alerts, equivalent to 4.21% of the country's total forest cover. In areas identified as highly suitable for cocoa cultivation (see Methodology section), forest loss alerts reached 359,969.5 hectares, or 4.23%, over the same period. The trend is worsening: 2024 marked the highest loss year, with nearly 1% of Cameroon's forests cleared; up from 0.65% in 2020. The impacts are particularly stark at the local level. Over the past five years, 64 subdivisions lost at least 10% of their forest cover, 21 lost more than 20%, five exceeded 30%, and two—Kribi II and Bafoussam II—lost over 40% of their remaining forests.

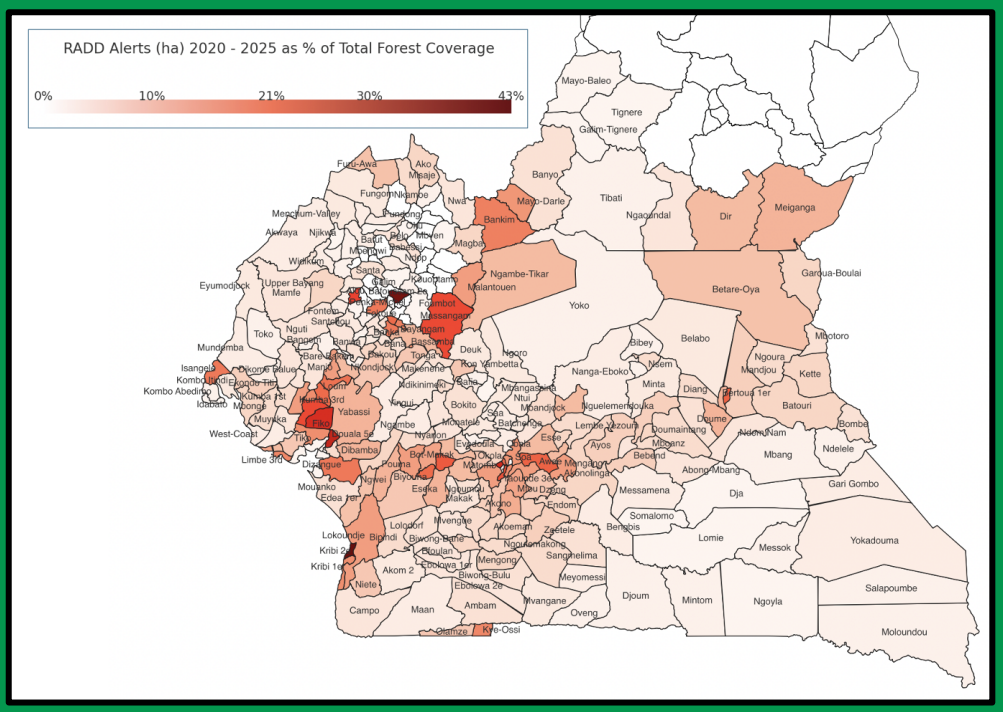


Figure 8: Forest loss in subdivisions of Cameroon between 2020-2025

Source: Mighty Earth, RADD Alerts

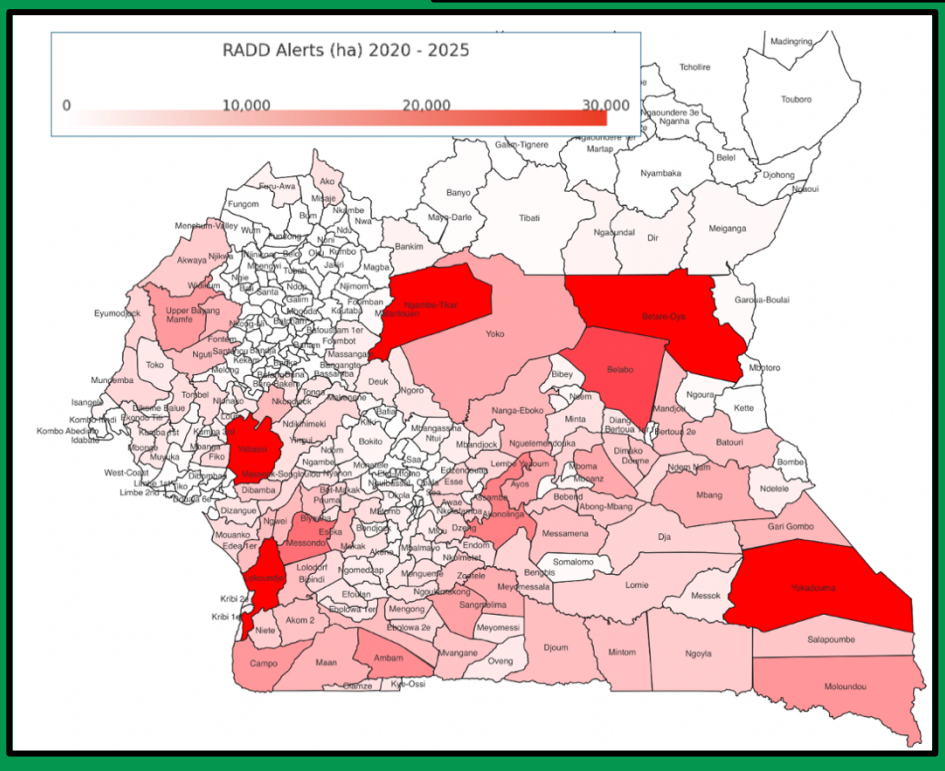


Figure 9: Forest loss in Cameroon's subdivisions as a percentage of total forest coverage between 2020-2025

Source: Mighty Earth, RADD Alerts

3.5 Corporate responsibility in the indirect supply chain

While sustainability efforts, including traceability, across the global cocoa industry have improved in recent years, they often fail to adequately address the core issues driving deforestation, and in many cases are limited to cocoa companies' "direct" supply chains, therefore only reaching a fraction of farmers that grow the cocoa they buy and sell. The 'indirect' cocoa supply (beans not sourced through a company's own traceability program) remains a blind spot where deforestation can occur unchecked.

In their 2024 Sustainability Report, for instance, Cargill notes that their direct supply chain, and corresponding mapping and sustainability efforts, only accounts for roughly one third of the cocoa they source.

> *"We work with an external assurance provider, KPMG N.V., to provide limited assurance on the selected sustainability KPIs in the table below. This assurance applies to our Cargill Cocoa Promise, which is part of our direct supply chain, and accounts for about one third of the cocoa we source."*
>
> – 2024 Cargill Impact Report, Page 3

Indirect supply chains significantly obscure cocoa's origin, weakening corporate accountability and hindering efforts to include farmers in sustainability initiatives. Companies use this opacity to distance themselves from environmental damage upstream, claiming cocoa sourcing is fundamentally "untraceable" and shifting the onus of monitoring the indirect supply chain and addressing these environmental and social risks on to other actors including farmers, cooperatives and local governments, who, by comparison, have limited financial resources.

In practice, this situation fuels ongoing deforestation as farmers, faced with immediate economic pressures, prioritize short-term survival over abstract sustainability pledges that lack tangible support. The vast majority of Cameroon's cocoa is grown by smallholders (often on less than 5 hectares), and nearly 69% of cocoa-farming households live below the poverty line. It is well-documented that poverty drives cocoa expansion as smallholders often expand farms into forests to increase output when prices or yields per hectare are too low to live on. The EUDR provides a defense against farm expansion into forests, since any new farms from converted forests will not be able to legally enter the main supply chain traded to the EU. Without direct financial incentives from companies, such as higher prices for deforestation-free cocoa and a coherent national development strategy for cocoa and rural development, conservation remains economically unattractive to farmers.

As a result, a "race to the last forest" continues in some communities, as farmers get little reward for conservation. It is telling that Cameroonian farmers themselves are now mobilizing and "fighting for corporate accountability" – forming associations and working with NGOs to ensure their rights and livelihoods are protected.

3.6 Cameroon's Cocoa 'Coxeurs'

Another factor preventing sustainability efforts from reaching the farm level is the high presence of informal intermediaries, known as 'coxeurs', in Cameroon's cocoa sector. Several factors have pushed Cameroonian cocoa farmers to increasingly sell their cocoa to coxeurs rather than formal actors such as cooperatives and licensed buying agents (LBAs).

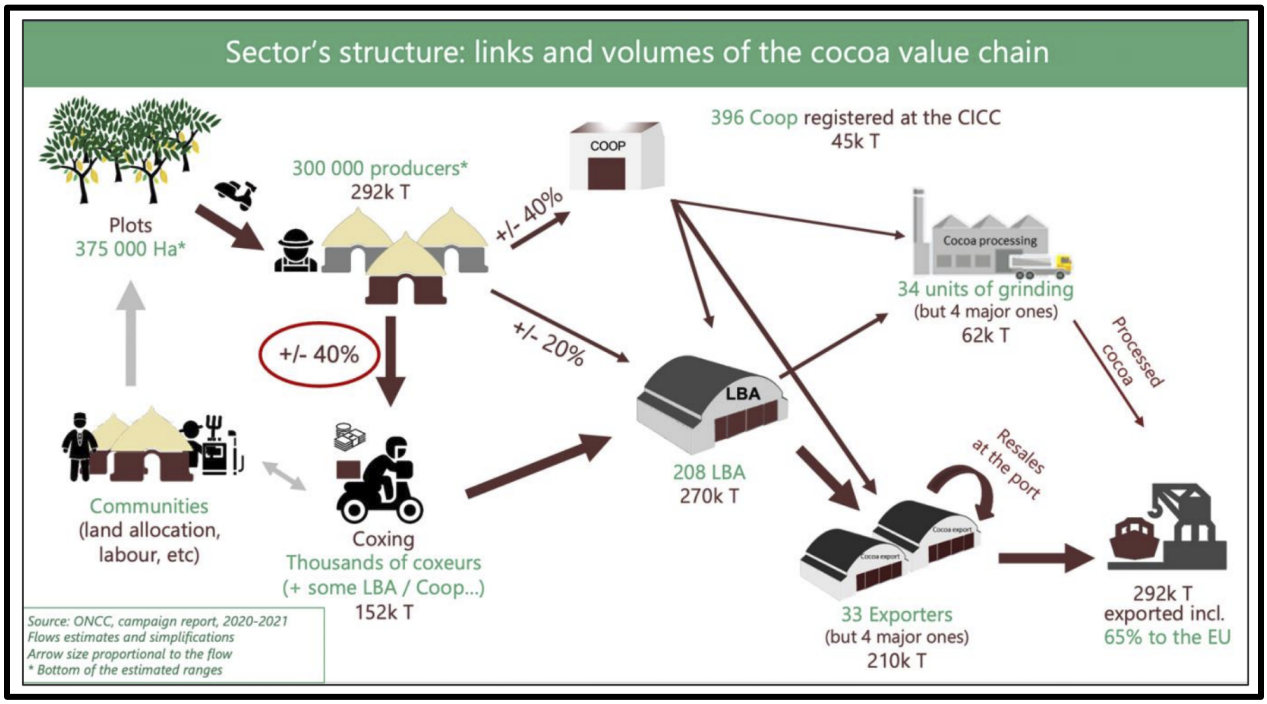


Figure 10: Estimates of cocoa bean flows in Cameroon by commodity chain. Areas in millions of hectares, and flows in thousands of tonnes (kT)

Source: Nitidae computer graphics based on ONCC data, Lescuyer et al., 2020 and CICC 2022 data.

In Cameroon, cooperatives and LBAs often lack the liquidity to immediately pay farmers when purchasing beans. Delayed payments from exporters also reduces the amount of readily available cash that these actors have and increases the risk they pose to banks. As a result, farmers persistently turn to informal agents, such as coxeurs, who are able to pay farmers for their beans on the spot. Coxeurs operate either independently or informally on behalf of licensed buyers or exporters, often backed by cash advances provided by companies in order to secure their future cocoa deliveries. They are also widely relied upon because they can reach remote cocoa-producing areas that formal supply chain actors struggle to access directly.

The persistent use of intermediaries exacerbates economic pressures on local producers; Cameroonian farmers have complained that "persistent underpayment by middlemen" leaves them struggling to earn a decent living. Although Cameroon's cocoa prices are significantly higher compared to other West African countries, the payments received by farmers remain inadequate due to uneven price distribution. Coxeurs, capitalizing on farmers' financial vulnerability, provide

immediate cash, but at substantially lower prices than farmers might receive from cooperatives or direct company purchases. As cocoa passes through multiple intermediaries — from village-level buyers to larger traders — each actor takes a margin, diminishing the farmers' share of export revenues. A visualization of this supply chain, reproduced from Nitidae & EFI, is captured in figure 7 above.

This layered structure not only reduces farmers' incomes but also complicates traceability, posing serious compliance risks under regulatory frameworks like the European Union Deforestation Regulation (EUDR), which demands detailed farm-level data. In such opaque systems, deforestation-linked cocoa easily blends with legitimate sources. Farmers who clear forests for additional cocoa plantations can find buyers through these unmonitored channels, effectively incentivizing ongoing deforestation. By extension, downstream companies thus profit from deforestation in their indirect supply chains.

Furthermore, indirect supply chains undermine sustainability programs since middlemen typically do not enforce sustainability standards (as we find in this report), indirect chains frequently lack essential checks like farm monitoring or adherence to farm development plans. Despite the prevalence of informal intermediaries known as coxeurs, Cameroon's cocoa authority (CICC) recently claimed that most cocoa farms have already been georeferenced by industry actors. In August 2024, Cameroonian officials reported that about 260,000 metric tons—roughly 80% of national cocoa output—had been mapped to the farm level.

The bottom line is that addressing deforestation effectively requires companies to have visibility of their supply chain to the farm level and subsequently incentivize and support farmers to grow cocoa sustainably by ensuring they receive fair prices for cocoa and access to capacity building on good agricultural practices.

4 CASE STUDIES

To better understand the local dynamics behind these broader trends, the following sections present detailed findings from each of the three regions visited during our field mission: Nkondjock, Yabassi, and Njombe. Each case study offers a closer look at how cocoa expansion is unfolding on the ground—revealing region-specific patterns of deforestation, the role of intermediaries, the (in)effectiveness of sustainability programs, and the extent to which farmers have been included in traceability systems. Together, these regional snapshots provide critical context for evaluating the national picture and identifying actionable opportunities for intervention, which are outlined in our recommendations section at the end of this report.

4.1 Nkondjock Case Study

In the heart of Cameroon's Littoral Region lies Nkondjock, an arrondissement in the Nkam department characterized by lush forests, much of which remain unprotected despite their rich biodiversity and proximity to the highly biodiverse Ebo National Park. The area's history as a cocoa-producing district is closely tied to the Nkam Development Company, locally known as SODECAM (Société de Développement du Nkam). Founded in the 1990s, SODECAM worked to boost agricultural development in the Nkam division, particularly by promoting cash-crop cultivation. Interviews with local producers highlight a notable shift during this period, from coffee cultivation to cocoa farming, driven primarily by the decline in global coffee prices. Our researchers sought to understand the extent to which cocoa cultivation, and associated deforestation, is ongoing in the region.

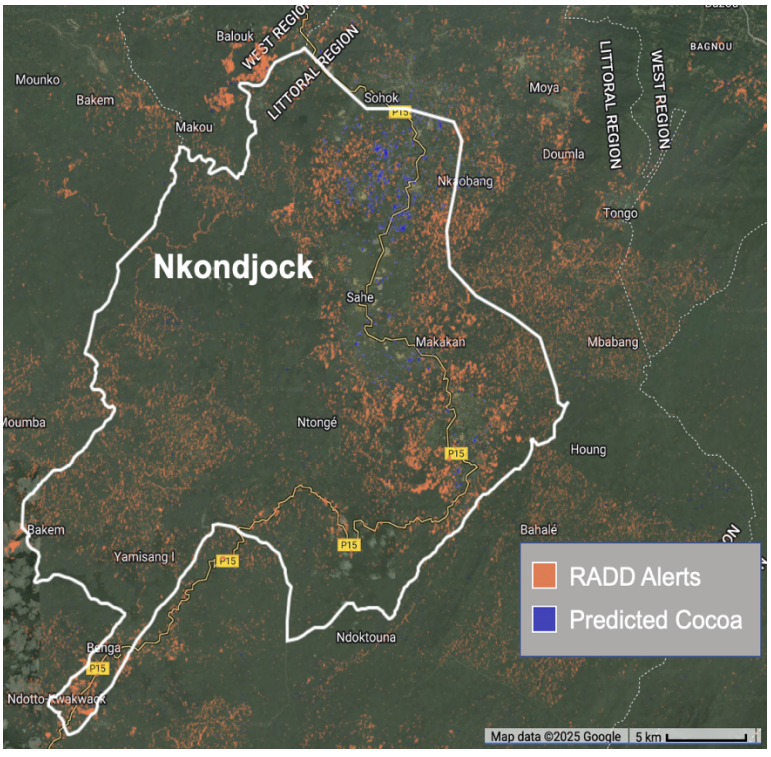


Figure 11: Map of Nkondjock indicating RADD alerts and areas of predicted cocoa cultivation

Source: Forest Data Partnership Community Cocoa Model & RADD Alerts; Visualized in Google Earth Engine by Mighty Earth

Our researchers surveyed 17 locations within Nkondjock, across the villages of Mabombe, Molock, Makakan, Tam Carrefour, Binjen II, Ndock-Tib, Didipe, and Ndock-Samba. Thirteen of these sites were actively under cocoa cultivation, and four showed visible signs of recent deforestation and newly planted cocoa saplings. Four additional sites were inaccessible due to terrain constraints. While some locations were selected based on our remote sensing methodology (e.g., RADD forest alerts and suitability maps), others were discovered during travel or identified by local farmers.

Figure 12: Recently-cleared field planted with plantain & young cocoa trees in Nkondjock. Source: CODED

The evidence from these visits strongly suggests that cocoa farming remains a primary driver of deforestation in the region. In several cases, cocoa was intercropped with fruit trees or plantains—species often introduced to provide shade for vulnerable young cocoa saplings. Notably, each site was selected based on RADD alerts indicating forest loss after 2020, reinforcing the connection between recent clearance and cocoa expansion.

To better understand the underlying motivations for forest conversion, our team conducted interviews with cocoa farmers about why they cleared land and to whom they sell their harvests. The responses—collected across several communities—indicated that deforestation is typically driven by a combination of economic necessity and the availability of unclaimed forest land.

Interview responses to "Why did you clear this land?" Translated from French (Original)

Reasons for choosing the area for cocoa cultivation	Objectives of deforestation
"We didn't have any land, and this was created by —- [community member's name]. Cocoa farming was encouraged."	"The objective was planting cocoa; we cleared the land ourselves and just continued our parents' work."
"Just to try to get by in life, I took an opportunity"	N/A
"The availability of forest"	"Only to plant cocoa"
"[I was] welcomed by the village chief who gave me the forest"	"To plant cocoa"
"Because space is available and there's access to water."	"To plant cocoa"

Figure 13: Deforested land in Nkondjock newly planted with cocoa. Source: CODED

One of the main objectives of our mission was to understand and map the local cocoa supply chain, including the actors involved in buying cocoa, their awareness—or lack thereof—of deforestation risks, and any local due-diligence systems at work. When asked about their immediate buyers, most farmers identified cooperatives (SCOOPs), Common Initiative Groups (GICs), or coxeurs. Critically, few farmers had any knowledge of their cocoa's final destination, and even cooperative representatives admitted they do not track where the cocoa ends up once aggregated and sold.

Multiple producers reported being members of groups such as GIC DYNAMIQUE, SCOOPODIL, DIFACOOP, SOCOPRAN, BINOUM, and GIC SMS, which allow them to pool their harvests for bulk sale and marginally improved pricing. However, they noted that aside from basic aggregation, these groups provide little to no technical assistance or sustainability support. Delayed payments from larger buyers also emerged as a common grievance, often pushing farmers to instead sell to coxeurs—despite the financial disadvantages.

In terms of end buyers, some producer groups reported annual sales to Barry Callebaut, while others mentioned Telcar Cocoa Ltd and Neo Industry. In terms of physical location, producer groups indicated that cocoa is typically transported to Bafang or Douala. Importantly, producers consistently stated that purchasing companies provide no support to improve agricultural practices, nor do they assist with compliance under the EU Deforestation Regulation (EUDR). None of the producers interviewed reported being certified or part of a sustainability program. While a few farms had been mapped under a government-led parcel mapping initiative, this appears to be the exception rather than the norm.

Traceability in Nkondjock is deeply constrained by these fragmented supply chains and lack of oversight. Most cocoa changes hands multiple times before reaching exporters, often through informal actors like coxeurs. This complexity makes it extremely difficult for companies to verify whether their cocoa is linked to deforestation. As a result, exporters and manufacturers remain effectively insulated from accountability, even as cocoa sourced from recently deforested plots moves downstream. The lack of certification, limited mapping coverage, and opaque intermediary networks leave a critical gap in traceability that undermines both corporate sustainability goals and regulatory compliance.

Coxeurs, in particular, play a pivotal but problematic role in this dynamic. Although they are widely relied upon for their logistical reach and ability to provide immediate cash, they also exploit farmers' financial vulnerability. According to multiple producers, coxeurs pay significantly lower prices and impose arbitrary deductions. One farmer commented, “They have cash power, so they buy the harvests cheaply, taking advantage of our financial emergencies.” Another added, “The coxeur has the cash advantage. When I need money now, I can't wait months for the cooperative to pay me.”

Unfortunately, despite several attempts, our researchers were unable to secure interviews with local coxeurs. Subsequent inquiries revealed growing wariness among them, likely due to fears of exposure by NGOs or journalists investigating abuses in the cocoa sector. As a result, the ultimate buyers of cocoa purchased through coxeurs remain unknown—another layer of opacity that severely limits traceability and accountability in the supply chain.

4.2 Yabassi Case Study

Yabassi is another arrondissement of the Nkam department, situated in a richly forested landscape bordering the ecologically significant Ebo forest massif. Long recognized as a major hub for cocoa production, Yabassi owes its agricultural prominence to a combination of factors including fertile soils and a humid tropical climate well-suited for cocoa cultivation. Historically, the region played a vital role in Cameroon's cocoa economy, with generations of farmers shaping the landscape through smallholder and cooperative-led production. While cocoa remains the dominant cash crop, Yabassi's agricultural diversity also includes palm oil, bananas, cassava, and other staples. Like Nkondjock, the surrounding forests hold high amounts of biodiversity, with endemic species and critical wildlife corridors connecting to the greater Ebo ecosystem.

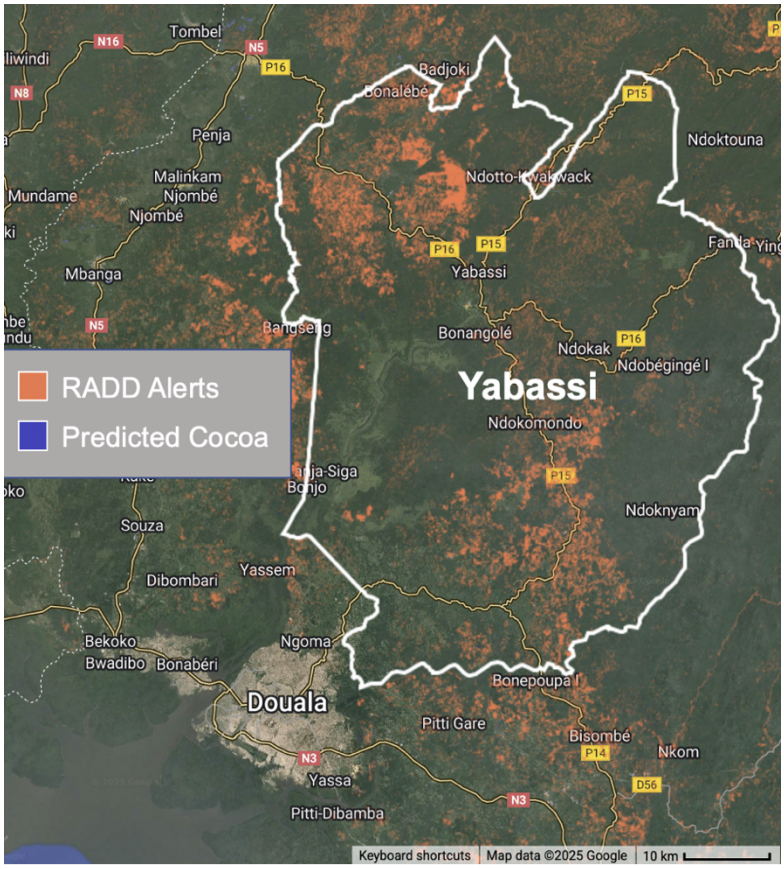


Figure 14: Map of Yabassi indicating RADD alerts and predicted cocoa growing areas

Source: Forest Data Partnership Community Cocoa Model & RADD Alerts; Visualized in Google Earth Engine

Our research team surveyed 11 sites across Yabassi. Of these, seven were under active cocoa cultivation, one was planted with oil palm, two had no visible crops, and one site was inaccessible due to a mandatory stream crossing. At several site visits, our team also observed signs of illegal logging, including large timber deposits and wheel tracks left by heavy machinery. In those cases, researchers concluded that logging may have been the primary driver of forest loss, with local farmers moving in to plant cocoa after the land was cleared. A local guide additionally pointed out three industrial-scale cocoa plantations, one of which is managed by the group GIC PRAGROP, indicating that not all cocoa farming in the area is smallholder-driven.

Figure 15: Researchers discover newly-planted cocoa in a recently-cleared field in Yabassi. Faces blurred to protect privacy.

Figure 16: Researchers find young cocoa interplanted with shade crops in a recently-cleared field in Yabassi. Faces blurred to protect privacy.

Among eight interviews with local farmers, five confirmed clearing forest since 2019, and three explicitly stated that they cleared land for cocoa since 2021. These admissions would seem to place them in direct violation of the EUDR, which prohibits the import of cocoa products linked to deforestation after December 31, 2020. When asked whether buyers enforce due diligence or traceability protocols, respondents indicated that any such measures are applied only to local intermediaries—not to farmers themselves. This creates a weak point in the supply chain where unsanctioned forest clearance can easily go undetected by downstream actors.

The motivations for clearing forest for cocoa mirrored those documented in Nkondjock. Farmers frequently cited land suitability, inheritance, low land acquisition costs, and basic survival needs. Responses such as “I cleared forest in order to farm,” “The soil is fertile there,” and “To make a decent living” reflect a confluence of economic necessity and opportunity. Some farmers inherited land or rented existing cocoa plots, while others were simply drawn to the crop’s profitability.

Specific Reason for Choosing Cocoa Cultivation Sites	Reason for Clearing Forest
"The land was suitable for this crop"	"The objective was to expand my cocoa plantation"
"Because the selling price of the land was not very high"	"I deforested to make room to plant cocoa there"
"Because I inherited it from my ancestors"	"I deforested in order to farm there"
"It is a family field"	"Our parents were the ones who deforested to farm"
"I only rented a cocoa field to work on it and make a decent living"	"I don't know"
"Cocoa grows well on this land"	"I deforested to be able to make way for agricultural fields"
"Because the soil is fertile there"	"I deforested in order to farm there"
"This is where my land begins"	"To cultivate cocoa and other agricultural products"

Figure 17: Maturing cocoa plantation in an area that was classified as forest in the year 2018 in Yabassi

Like in Nkondjock, intercropping is a common practice in Yabassi. Producers reported mixing cocoa with plantains, macabo, fruit trees, and palm oil—partly in order to protect young cocoa trees from sun exposure but also as a means of diversifying income.

When asked about their buyers, farmers generally stated that they prefer to sell through group sales organized by cooperatives and GICs, working with company representatives and organizations such as GIC AGRICOP, GIC MBAH I BISU, SIC Cacao, and GIC PRAGROP. However, payment delays within this system often drive them toward middlemen (coxeurs), who provide immediate cash. Unfortunately, many respondents reported that dealing with coxeurs comes with challenges, including unfair weighing practices and non-compliance with official pricing regulations. Despite these issues, eight out of ten respondents said they sold to coxeurs, while only two sold to GICs. Several producers preferred selling directly to coxeurs rather than cooperatives, citing reasons such as:

- "They always have money available to get us out of some difficulties."
- "We deal with them because they are the only buyers we know."
- "Coxeurs allow us to manage situations that require money in an emergency."

This reliance reflects a broader structural problem: the financial and logistical convenience offered by coxeurs continues to outweigh the weak incentives currently provided by cooperatives or

buyers that may require sustainability standards. Many coxeurs offer pre-financing at the beginning of the season, typically under exclusive buying arrangements. As one producer explained, “Pre-financing is conditioned on guaranteeing exclusive supply to the buyer.” Yet beyond this transactional relationship, most producers receive no training, support, or assistance with certification or EUDR compliance. Additionally, the final destination of the cocoa purchased by these intermediaries remains unclear. Producers have no visibility or traceability over where their harvests go and, consequently, do not know which international companies ultimately receive their products.

Cooperatives and the traceability gap

In Yabassi, our team also conducted interviews with representatives from three cooperatives/Common Initiative Groups (GICs), which function as intermediaries between producers and cocoa buyers. These groups reported sourcing cocoa from their own members, independent smallholders, other GICs, and small-scale aggregators—highlighting the fragmented nature of local supply chains. Collectively, they estimated their annual cocoa acquisition at approximately 300 tonnes, with all volumes transported to Douala for storage or processing. Their buyers included large traders such as Telcar Cocoa, Barry Callebaut, Olam Cam, and National Enterprises.

Notably, none of the cooperatives reported handling certified cocoa. When asked about their understanding of certification, most equated it with post-harvest quality metrics—such as moisture content or bean cleanliness—rather than environmental or social standards. This confusion underscores a widespread misconception: many cooperatives and producers mistakenly believe that "certified" cocoa automatically meets international sustainability criteria, when in fact certification alone is not sufficient to meet the requirements of the EUDR.

This misunderstanding reflects a deeper issue: companies have not done enough to educate or support their suppliers about EUDR requirements. While a few cooperative representatives said that buyers like Barry Callebaut conduct training or offer technical assistance, most reported no engagement, and many had never even heard of the EUDR. One respondent described Barry Callebaut’s due diligence as being limited to its local representatives, without extending to the cooperatives or farmers themselves. Focusing only on intermediaries while neglecting those at the production level, could create serious gaps in traceability and compliance.

While some companies may assume that sourcing certified cocoa shields them from regulatory risk, this is a false assurance. The EUDR requires geolocation data for all plots, evidence of legal compliance, and proof that cocoa has not been sourced from recently deforested land — regardless of whether it is certified. In this context, uncertified cocoa can be EUDR-compliant as long as the proper due diligence has been conducted, while ‘certified’ cocoa that lacks farm-level traceability or legality assessments would not be allowed on the market. The responsibility for ensuring compliance lies squarely with the companies placing cocoa on the EU market, not with farmers or cooperatives. Without company-led investment in training, mapping, data collection, and transparent purchasing practices, producers and cooperatives remain ill-equipped to meet the regulation’s standards and remain within the supply chain.

Coxeurs in Yabassi

As described above, coxeurs play a crucial role in the cocoa supply chain in this region, bridging the gap between producers and larger buyers. During our fieldwork, two coxeurs—one based in Yabassi and the other in Solé — agreed to speak with us, shedding light on their operations and the challenges they face.

Our interviews revealed that sourcing networks extend across all villages in Yabassi and into Loum, another key cocoa-producing region. Procurement areas include Solé, Benga, Tabaco 1 and 2, Mabombe 1 and 2, Ndock-Mbele, Lamba, Nkomalang, and Ndokati. On average, the coxeurs travel approximately 300 kilometers per season to collect cocoa—highlighting the scale and complexity of informal sourcing networks that companies often rely on, but struggle to monitor. While these procurement zones remain relatively stable, they expand as new production areas emerge. The volume of cocoa purchased each season typically ranges between 100 and 200 tonnes, though this fluctuates based on production levels and available capital. The size of these sourcing networks highlights a critical challenge for traceability; without rigorous documentation from coxeurs detailing which producers they source from and where those producers are based, downstream cocoa buyers cannot know where their cocoa comes from.

Without a formal system for documenting purchases, companies downstream cannot verify the origin of cocoa sourced by coxeurs. As one coxeur explained, “We sell in Loum to the local representative of Barry Callebaut.” Another reported selling to GIC Kana in Mbanga. These statements confirm that cocoa collected by informal intermediaries enters the supply chains of major international traders — but without the documentation necessary to meet the EUDR’s traceability requirements.

We also asked about one of the most contentious issues surrounding coxeurs: pricing. When asked about pricing practices, the coxeurs explained that they consider a mix of factors: market price fluctuations, transportation costs, cocoa quality, distance, and the financial needs of producers. This lack of standardized pricing allows them to adjust rates flexibly—but often in their own favor. Producers frequently accuse coxeurs of exploiting this flexibility to impose unfair deductions or pay below-market rates. Yet, despite these concerns, coxeurs remain indispensable to many farmers by offering cash-on-the-spot, pre-financing, and short-term loans—services that cooperatives or exporters rarely provide.

When asked about their expectations from buyers, the coxeurs were clear: they want training, technical support, and improved access to finance and tools. They emphasized that such assistance would not only strengthen their role in the supply chain but also help them comply with the EU Deforestation Regulation (EUDR). They emphasized that if companies expect traceability and deforestation-free sourcing, they must include coxeurs in these systems. Traceability to the farm level is possible—but it will require that companies either formally integrate intermediaries like coxeurs into their supply chains or create direct sourcing models with local buying stations. At present, most companies prefer to aggregate cocoa downstream, leaving the first point of purchase to local actors—a practice that may pose compliance risks under the EUDR.

4.3 Njombe Case Study

Njombe is an arrondissement in the Moungo department. The district serves as an important agricultural hub for the Littoral region. In addition to cocoa farming, it also produces commodities such as bananas–primarily grown by the agro-industrial company Plantation du Haut Penja (PHP)--, pineapples, plantains, papayas, and other fruits that supply markets of major cities like Douala. Along with the subdivisions of Loum and Mbanga, Njombe is an important link in the cocoa production basin of Moungo due to its relatively young population, favorable climate, and availability of arable land.

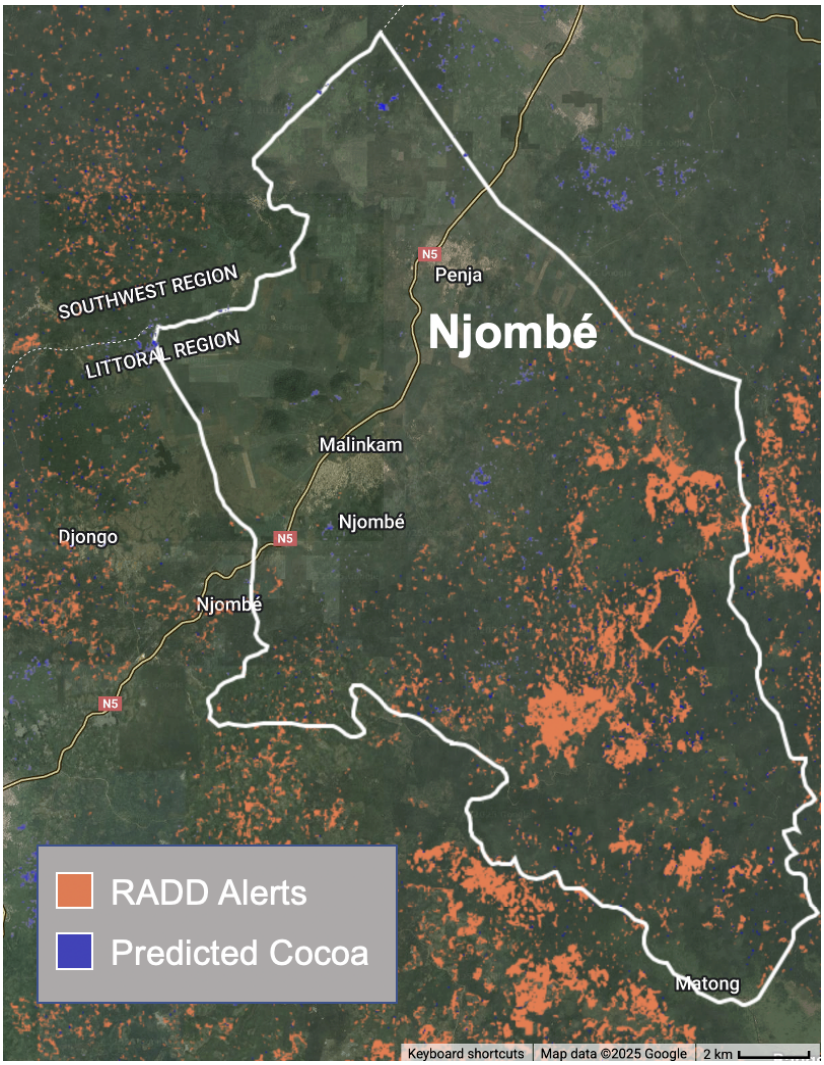


Figure 18: Map of Njombé indicating RADD alerts and areas of predicted cocoa cultivation

Source: Forest Data Partnership Community Cocoa Model & RADD Alerts; Visualized in Google Earth Engine

We selected Njombe for investigation in response to a marked rise in RADD alerts over recent years. Although the district contains no official forest reserves, it features extensive unprotected

forested areas that are highly susceptible to agricultural encroachment. During our fieldwork in the rural communities of Koumbé and Singa, we identified five cocoa fields where forest had been cleared to establish plantations. While some were newly established, most were older farms with evidence of more recent clearance along their perimeters. Unlike the monoculture plantations observed in Nkondjock and Yabassi, many of the cocoa plots in Njombe were intercropped with bananas, avocados, oranges, and subsistence crops like cassava and macabo—a sign of greater crop diversity but not necessarily more sustainable land use.

Figure 19: Young cocoa plantation encroaching upon forest in Njombé. *Source: CODED.*

Interviews with local farmers revealed that deforestation remains the primary method for establishing cocoa farms. According to respondents, the timing of clearance ranged from 2007 to as recently as 2022, with 60% stating they had cleared land since 2019, and some after the EUDR cutoff date of December 31, 2020. While these plantations may be productive and legally owned under Cameroon's customary land tenure system, they will be ineligible for EUDR-compliant exports. Yet our findings suggest that this cocoa will likely move through the supply chain unchecked.

Ownership dynamics in Njombe are further complicated by Cameroon's land-use regime, which allows individuals to claim rights over national forest land through cultivation. Farmers told us they had either cleared the land themselves or purchased it from those who had. This system incentivizes forest clearance as a path to both land tenure and income. The chart below captures their stated motivations for clearing forests:

Reason for Choosing Specific Cocoa Cultivation Sites	Objective of Deforestation
"At the time, that was what was trending."	N/A
"I just bought the land and decided to use it for something."	N/A
"I was simply looking for a space to cultivate land, and this one was available, so I bought it."	N/A
"Because cocoa is profitable at the moment, and the area is favorable for its cultivation."	"I don't know anything about it since I wasn't the one who deforested."
"I bought the forest that was offered to me."	"To clear it to plant cocoa and palm oil."

Figure 20: Young cocoa saplings planted alongside more mature cocoa trees in an area with RADD alerts. Source: CODED.

While several producers in Njombe reported selling to cooperatives such as SO.COOP.APCCN and to SIC Cacao—the local representative of Barry Callebaut—many preferred to work with coxeurs. The reasons echoed patterns observed in other regions: coxeurs provide immediate cash, are geographically accessible, and often offer pre-financing at the beginning of the cocoa season in exchange for exclusive supply agreements. "They're the only buyers we know," one farmer told us. Another stated that, "We call them directly, or go to their warehouse—it's simple."

Some producers in Njombe demonstrated a better understanding of where the cocoa ends up than our earlier interviews in Yabassi and Nkondjock. They reported that coxeurs deliver either directly to Douala or first to Mbanga, where large buyers and cooperatives consolidate shipments for export. But while this awareness is notable, it does not necessarily equate to traceability: from what we could tell, there is no formal documentation linking the cocoa from a specific farm to its final buyer.

Company Engagement in Njombe

During the field investigation in Njombe, Barry Callebaut (via its subsidiary SIC Cacao) agreed to speak with our field team. The representative claimed that the company purchased over 100 tonnes of cocoa from Njombe during the current season, sourcing primarily from producers and cooperatives with whom it has formal agreements. The company stated that it purchases "certified" cocoa and takes steps to segregate certified from non-certified beans, trains farmers through technical agents, and provides agricultural inputs and quality premiums.

However, these claims contradict interviews with local farmers, who consistently reported receiving no training, no inputs, and no financial support from Barry Callebaut or any other large buyer. This disconnect raises concerns about the company's visibility into its own supply chain and suggests that traceability systems, if they exist, are incomplete or poorly enforced.

It is essential to emphasize that certification is not a substitute for EUDR due diligence. A cocoa shipment may be certified by a voluntary sustainability standard and still fail to comply with the EUDR if it lacks verified geolocation data, evidence of legal land tenure, and proof of deforestation-free origin. Even certified supply chains can obscure illegal clearance if companies do not independently verify claims through ground-truthing and spatial monitoring. Companies cannot assume compliance—they must demonstrate it.

Coxeurs in Njombe

In this region, only one coxeur agreed to be interviewed. Describing his sourcing network, he explained that he primarily purchases cocoa from farmers in Njombe, as well as from several surrounding villages (including Bonadam, Booba, Ekite, Kumbe, Ngomba, and Njoungou). To cover these areas effectively, he estimated that he travels an average of 150 kilometers during the harvest season. Over the course of a single season, this coxeur purchases approximately 200 tons of cocoa—or twice the purchasing capacity of the representative from Barry Callebaut, suggesting that indirect sourcing may account for a significant percentage of cocoa purchased in the region.

When asked why farmers choose to work with independent coxeurs rather than selling directly to companies or cooperatives, he emphasized the critical role that middlemen play in providing financial support, “We provide advance payments and financial assistance at the start of the season,” he explained. “We are close to the farmers and always have money available to help them in emergencies.” This highlights the importance of financial accessibility in shaping farmers' commercial decisions.

Unlike companies that operate through structured contracts, the coxeur noted that his arrangements with farmers are typically informal, based on trust and mutual benefit. At the beginning of each season, he provides advance payments that allow farmers to invest in necessary farm maintenance, such as purchasing inputs and hiring labor. When determining the price he pays per kilogram of cocoa, he considers multiple factors, including prevailing market prices, the distance between the point of purchase and the final distribution hub, and the condition of the roads he must travel given the wear and tear on his vehicle.

Despite the advantages of this system for both coxeurs and farmers, he acknowledged that improvements could be made. He expressed a desire for cooperatives to take a more active role in supporting farmers and intermediaries by offering better financial resources and technological tools. Such support, he suggested, could enhance overall efficiency and ensure greater stability in the sector. Ultimately, the cocoa he purchases is sold to the Groupement d’Intérêt Commun PROCAMBA (GIC PROCAMBA) in Mbanga, which then supplies grinding and export companies, including Barry Callebaut.

5 SUMMARY AND CONCLUSION

This report exposes a systemic and urgent challenge: the cocoa sector in Cameroon is expanding rapidly into forested areas, often through informal and poorly documented supply chains that undermine environmental commitments and regulatory compliance. Across Nkondjock, Yabassi and Njombe, cocoa-driven deforestation is ongoing, frequently taking place after the 2020 cutoff date of the EU Deforestation Regulation (EUDR). Traceability systems are incomplete, and purchasing companies (despite public-facing zero-deforestation pledges) often remain disconnected from the realities on the ground.

The prevalence of coxeurs in all three regions underscores both the logistical value and the regulatory blind spots embedded within the industry. These intermediaries provide critical financial lifelines to smallholder farmers but also operate largely outside of formal oversight mechanisms. As long as downstream companies continue to rely on coxeurs for first-mile sourcing without integrating them into traceability systems, they are effectively outsourcing the risks of deforestation, non-compliance, and farmer exploitation.

These specific case studies are representative of broader trends across the Cameroonian cocoa sector-- exactly the sort of issues with deforestation tainted imports the EUDR is meant to address.

As the country becomes an increasingly important origin for cocoa exports to the EU, it must build transparent, accountable supply chains to protect the Congo Basin's forests. Full traceability is not only necessary for compliance, but also essential for identifying emerging deforestation hotspots, prioritizing remediation efforts, and ensuring that cocoa production supports rural development rather than undermining it.

Spurred on by EUDR, Cameroon has the potential to not repeat the ecological crisis caused by cocoa in West Africa. Cameroon's cocoa sector faces a turning point: without reform, deforestation will worsen, but with collective action, and a truly transparent, traceable, and equitable supply chain, it can produce cocoa that protects forests and empowers farmers.

6 RECOMMENDATIONS

To International Cocoa Companies:

1. Investigate and Disclose Deforestation Risk: Conduct in-depth investigations of cocoa-driven deforestation in sourcing subdivisions highlighted in this report and publish the findings.
2. Publish Farm-Level Maps and Supply Chain Data: Publicly share a list of the names and coordinates of all cooperatives, licensed buying agents, GICs, and intermediaries that you source from in Cameroon. Publicly disclose what percentage of total cocoa purchases comes from direct vs indirect. Publicly share a map of specific sourcing areas and volumes purchased within these locations.
3. Disclose Deforestation Risk Assessments: Publish details of any deforestation risk assessments undertaken in the last 12 months, including the methodologies used and criteria for high-risk areas.
4. Report on Remediation Measures: Provide detailed accounts of the actions taken when deforestation is discovered—both in direct and indirect supply chains—including how companies are supporting farmers in remediation.
5. Create a Public Grievance Log: Maintain a regularly updated grievance log that documents reported Supplier Code of Conduct violations and the steps taken to address them.
6. Integrate Coxeurs into Traceability Systems: If companies rely on coxeurs, they should formalize these relationships, requiring rigorous documentation of farmer-level sourcing and adherence to EUDR provisions; ensure that all farmers are registered, geolocated, and included in the same training, monitoring, and pre-financing programs as in their direct supply chains;
7. Invest in Decentralized Buying Infrastructure: Build or support rural buying stations that allow for direct farmer engagement, eliminating the opacity of the first mile; establish long-term contracts with farmers; set up mobile payment systems; and pay a Living Income Reference Price (LIRP).

To the Cameroonian Government:

1. Continue to develop a National Cocoa Management System. This should include a centralized farmer registry, mapped farm polygons, forest alert integration, and a transaction tracking mechanism for all supply chain actors.
2. Release Mapped Farm Boundaries: Farm boundary data already collected under government mapping initiatives to support national traceability efforts should be shared with Civil Society or made publicly accessible.
3. Incentivize Cocoa on Degraded Lands Only: Promote cocoa cultivation on lands deforested before 2020 and encourage agroforestry systems—but not at the expense of intact forests.
4. Regulate Coxeurs: Develop a formal regulatory framework for informal cocoa buyers and sellers, including requirements for self-registration or licensing, basic recordkeeping, and price transparency. These steps will help integrate coxeurs into traceability systems and ensure they operate under national oversight.
5. Align Cocoa Production with Rural Development Goals: Integrate cocoa policy into broader rural development strategies to ensure the sector contributes meaningfully to poverty reduction, job creation, and equitable economic growth rather than deepening inequality.
6. Promote Deforestation-Free Agroforestry: Support and incentivize agroforestry practices that do not involve further forest clearance. Prioritize the mapping and documentation of existing agroforestry systems on previously deforested land to ensure alignment with EUDR compliance requirements.
7. Strengthen Financial Services for Cooperatives: Ensure that farmers receive a fair price that reflects the quantity and quality of cocoa that they produce that protects farmers from exploitative practices or external financial shocks. Establish a transparent and accessible financial system to ensure that legally registered cooperatives have timely access to working capital. This will reduce farmers' dependence on informal intermediaries by enabling cooperatives to offer prompt payments and pre-financing at competitive rates.

To the European Union:

1. Scale Up Technical and Financial Assistance: Expand funding for EUDR implementation readiness in Cameroon, and ensure meaningful inclusion of civil society, not just government ministries. This assistance should prioritize measures designed to help prepare smallholder cocoa producers for EUDR readiness, as well as engagement with cocoa buyers about how to incentivize smallholder compliance through premium pricing for supplying EUDR compliant materials.

2. Monitor and Enforce Compliance: Ensure companies importing into the EU are meeting EUDR due diligence standards and publish enforcement actions where violations occur.
3. Collaborate with the government of Cameroon and Cameroonian civil society to effectively prepare stakeholders across the cocoa industry for the EUDR, including clarification of best-practice agroforestry that does not expand into forest areas.

To Cooperatives and GICs:

1. Ensure rigorous due diligence and documentation of cocoa sales: including traceability to the farm level; accounting of volumes of cocoa bought and sold.
2. Improve Financial Services: Offer timely cash payments and accessible pre-financing to reduce farmers' dependence on informal buyers.
3. Support EUDR Readiness: Provide farmers with education on the EUDR, its traceability requirements, and legal land-use standards

To all supply chain actors buying and/or selling cocoa:

1. Become EUDR Compliant Partners: Record and share information on which farmers they buy from, what lands cocoa is grown on, and where it is sold.
2. Ask Questions: Before purchasing cocoa, verify whether the land complies with legal, traceability, and deforestation-free requirements.
3. Ensure that farmers are paid a fair price for cocoa and are paid on time.

To Civil Society and the International Community:

1. Coordinate Forest Protection Efforts: Strengthen collaboration between national and international NGOs, community-based organizations, and technical partners to implement and monitor forest protection strategies. This includes aligning activities with national land-use plans, supporting enforcement mechanisms, and ensuring that local voices—especially those of Indigenous and forest-dependent communities—are meaningfully included in decision-making.
2. Support EUDR Preparedness: Work alongside government, companies, and farmer organizations to coordinate EUDR implementation. This includes identifying key gaps in traceability and compliance, raising awareness of the regulation among supply chain actors, and monitoring high-risk areas for forest loss linked to cocoa expansion.
3. Build Farmer Capacity: Invest in training and outreach programs that support cocoa farmers in understanding sustainability requirements, adapting to traceability systems, and meeting EUDR due diligence criteria. Empower producers with clear, practical guidance on what is needed to maintain market access under emerging regulations.
4. Fund Forest Conservation: Scale up climate finance and results-based payments to reward Cameroon for protecting its remaining forests. Prioritize funding mechanisms that offer viable, community-led alternatives to deforestation-based development and incentivize the transition to sustainable rural livelihoods.

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Acknowledgements:

Author: Jackson Harris (Mighty Earth)

Research: TINA BIYO'O Célestin, Annick Gresson DJEUMI and Rodrigue SONKENG (Communauté et Développement Durable - CODED)

Input and editorial support: Amanda Hurowitz, Amourlaye Touré, Julian Oram, Samuel Mawutor and Thea Parson (Mighty Earth)

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