

# Miro Forestry & Timber Products

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Environmental and Social Impact Assessment  
Information package

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**Annexes provided as separate documents:**

- ANNEX 2 ESIA for Boumfum Forest Reserve in Ghana
- ANNEX 3 ESIA for Expansion in Chirimfa and Awura Forest Reserves in Ghana
- ANNEX 4 ESIA for Yoni Chiefdom in Sierra Leone
- ANNEX 5 ESIA for Expansion in Yoni and Masimera Chiefdoms in Sierra Leone
- ANNEX 6 ESIA for Pole Treatment Plant in Sierra Leone

# 1 INTRODUCTION

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Miro is a forestry and timber products business based in the UK that initiated operations in 2010. The two subsidiary companies of the group develop sustainable, commercial timber plantations in Ghana and Sierra Leone, as well as timber processing activities.

In Ghana, Miro operates on land within national Forest Reserves, leased from the Forestry Commission and the Paramount Chiefs through a Public Private Partnership agreement. In Sierra Leone, the company leases land directly from the local communities. The main species planted include eucalypt, gmelina, corymbia, acacia and teak.

Miro has a firm commitment to sustainability and to creating positive environmental and social (ES) impacts through its operations. The company fully adheres to best practices and international standards, mainly the IFC Performance Standards, which are followed in all its processes. Furthermore, all company operations are FSC certified.

Over the years, Miro has developed a comprehensive Environmental and Social Management System (ESMS) that provides the framework, tools and resources necessary to identify and assess potential ES impacts, define appropriate mitigation measures and monitor their implementation, and promote additional positive ES impacts. The ESMS is continuously reviewed, expanded and improved as company operations develop.

In line with this approach, Miro has commissioned a number of Environmental and Social Impact Assessments (ESIA) in order to assess the potential ES impacts of foreseen operations and to define adequate mitigation measures, as well as to comply with the legal requirements in both countries:

- In Ghana an ESIA was commissioned in 2014 for the start of operations in the Boumfoum Forest Reserve, followed by a second ESIA in 2018 for the expansion of operations in the Awura and Chirimfa Forest Reserves. These covered planned industrial activities.
- In Sierra Leone a first ESIA was conducted in 2014 for operations in the Yoni Chiefdom, followed by a second ESIA in 2018 for expansion to additional land in the Yoni and Masimera Chiefdoms. Another ESIA was conducted in 2020 for a Pole Treatment Plant.

The five ESIA reports are provided separately as ANNEXES 2 to 6 of this information package, in compliance with GCF disclosure requirements.

The Arbaro Fund invested in Miro in November 2018 alongside other investors. At that time, Miro had established approximately 10,000 ha of plantations and operated small-scale pilot facilities for production of charcoal in Ghana and sawnwood in Sierra Leone. The objective of the investment was to support the company in continuing plantation establishment, at a planned rate of 2,000 to 3,000 ha per year, and in further developing its industrial strategy to process and add value to the growing wood flow resulting from incipient thinning and harvesting operations.

As part of the ES assessments during the investment process, an ES due diligence was conducted by external consultants on behalf of one of the coinvestors to assess compliance with the applicable standards, which among other included the IFC Performance Standards, ILO conventions, EHS Guidelines of the World Bank, FSC standards, human rights and national legislation. The study confirmed that operations were overall well aligned with the reference standards, but also revealed a number of gaps that needed to be addressed to reach full compliance. Corrective measures were formulated in an Environmental and Social Action Plan that was part of the investment documentation. Ever since, Miro has worked on the implementation of the corrective measures, with most of them already fully closed and a small part still being work in progress.

At present, Miro manages 16,500 ha of timber plantations and over 7,000 ha of conservation areas. The company also operates a veneer mill in Ghana and a sawmill in Sierra Leone, while charcoal operations have been abandoned. In total, company operations support approximately 2,000 employees. The next chapter provides an overview of the current compliance of the company operations with legal requirements and international standards, as well as with the mitigation measures and provisions for an Environmental and Social Plan (ESMP) recommended as part of the ESIA processes.

Miro continues expansion of plantation areas and particularly further development of industrial operations, in its objective of becoming a fully vertically integrated forestry company. Additional finance is being raised for these purposes. Miro has initiated construction works for a pole treatment facility in Sierra Leone and a plymill in Ghana that will replace the current veneer production line, adding further value to the products. Operations will adhere to the same environmental, social and health and safety standards that guide the existing operations. Relevant impact assessments have been conducted and Miro is in the process of obtaining the necessary permits.

## 2 COMPLIANCE WITH ESIA

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This chapter presents an overview on the current compliance of Miro operations with the applicable legal requirements in each country of operations and with the provisions for ESMP and mitigation measures that were recommended as part of the different ESIA's conducted.

### 2.1 Compliance with legal requirements

Miro is subject to a number of laws and regulations in both Ghana and Sierra Leone that establish ES and corporate requirements. The legal framework applicable to Miro operations was initially identified as part of the ESIA process and the company has subsequently established a system that ensures full awareness of the requirements and timely compliance. Miro has received no official complaints or penalties, nor is in violation of any of the applicable laws and regulations.

The overall compliance with the law is most importantly reflected in the obtention and maintenance of **environmental permits** that are needed to operate. Miro holds valid permits for the existing plantation and industrial operations in both countries and is in the process of obtaining the relevant permits for the new industrial developments that are under construction and will start operating in the coming months (see Table 1).

Table 1 Environmental permits

Operations	Country	Permit number	Valid until
Plantations	Ghana	CF 58/4/LG/FO/02	24.02.2022
Charcoal	Ghana	ASHKONCU00023.03	01.09.2021
Veneer	Ghana	ARCU002013	23.11.2020 (renewal and change to plywood pending)
Plantations and sawmill	Sierra Leone	EPA-SL 088	11.12.2020
Pole treatment	Sierra Leone	-	Application undertaken

The environmental permits for forestry and industrial operations are issued by the Environmental Protection Agency (EPA) of each country as a result of the ESIA process. Permits are regularly renewed and as part of the requirements, Miro submits quarterly monitoring results (Sierra Leone) and annual reports (Ghana and Sierra Leone) to the EPA of each country. Those reports include site visits and provide information on:

- Nursery and plantation operations
- Chemical products management
- Water management and effluents
- Waste management and pollution control
- Occupational health and safety
- Community engagement
- Relevant permits

The reporting and permit renewal process allows the EPA to closely monitor any ES impacts of Miro operations and control compliance with legal requirements.

In addition to the controls in place by national authorities, compliance with national and local laws is also controlled by independent auditors as part of annual FSC surveillance audits. The most recent surveillance audit (conducted in 2020) found no evidence of non-compliance with legal and administrative requirements.

## 2.2 Compliance with ESMP

### 2.2.1 Environmental and Social Management System

Since the start of operations, Miro has developed a comprehensive and fully operational ESMS to identify and address any potential ES impacts of its operations, as well as to promote positive impacts, and to ensure the compliance with legal requirements and international standards.

The ESMS is based on the following **policies**, which are implemented through a number of plans, programs, procedures and action plans:

- Occupational health and safety
- Labour and human rights
- Environmental and sustainability
- Community engagement and external stakeholder
- Land development
- Security
- Procurement
- Anticorruption, whistleblowing and business integrity
- Public relations, communications and media

The **Compliance Director** of Miro is responsible for the implementation of the ESMS at group level and coordinates local teams in both countries of operations, each of which includes dedicated Operational Health and Safety (OHS) Officers, Environmental Officers and Community Liaison Officers. In its efforts to improve the overall OHS culture, the company has recently recruited an OHS Manager who coordinates health and safety matters across countries.

The ESMS is reviewed on an annual basis and is continuously improved and expanded, as plantation areas increase and new production lines are developed. As part of this process annual budgets and training needs are defined.

The ESMS in place provides appropriate framework, tools and resources to address the potential impacts that were identified as part of the ESIA and to implement the recommended mitigation measures and ESMP provisions. In the following sections, specific measures to manage major risk areas identified during the ESIA are described in more detail.

### 2.2.2 Land planning

Miro applies a **land development implementation framework** by which ES risk assessments are conducted on the future plantation compartments prior to the start of operations. The framework is followed to identify land uses, land users and affected communities, assess potential adverse impacts and define mitigation measures. Any areas within the compartments that have ecological value (such as natural forests, wetlands and riparian habitats) or cultural value are demarcated and defined as conservation areas.

The approach followed to select the plantation sites and conduct the ES risk assessments is adapted to the specific circumstances and applicable law of each country.

In Ghana, where Miro operates on land within national Forest Reserves, sites are selected in cooperation with the Forestry Commission and traditional councils. While the law prohibits living and farming in the reserve, this has not been fully enforced in the past, and in some cases informal land uses are encountered in the compartments. In such cases, the affected people receive formal notice to vacate the land, with sufficient time to harvest the crops. As the law prohibits the provision of direct economic

compensation or replacement land to informal land users, Miro has developed a procedure to address such situations in line with international standards (IFC Performance Standard 5) and in compliance with the law. Potential scenarios have been identified and for each case, provisions are in place to collect baseline information, assess vulnerabilities and define adequate mitigation measures. Miro has adopted an offset approach based on providing alternative livelihoods, that may include intercropping and preferential access to employment, smallholder programs and other development activities. The company also works with the communities to raise awareness on informal land uses and unauthorized practices in the reserves, as recommended in the ESIA.

In Sierra Leone, where Miro leases land directly from the communities, land is selected based on a consultation process with the communities and village mapping exercises to ensure that demarcation of land has been a joint decision and does not pose a threat to livelihoods.

### 2.2.3 Operations and health and safety

For each country Miro has elaborated a **Forest Management Plan** that sets out the general principles for the plantation forestry project. The plan describes the foreseen silvicultural regime and associated operations and provides general guidance to conduct those in line with national requirements, international best practices and FSC standards. In parallel, Miro has developed **best operating procedures** for certain operations with additional and detailed prescriptions to complete the tasks in accordance with company standards. ES and OHS mitigation measures are fully integrated in operational procedures, in line with ESIA recommendations. Major operations and activities for which operational procedures exist include:

- Road construction
- Road maintenance
- Fire management
- Plantation establishment
- Silviculture maintenance
- Pest control
- Forest planning
- Harvesting
- Chemical stores
- Workshops
- Fuel storage
- Waste management
- Conservation management
- Land development

Similar to plantation activities, best operating procedures are also developed for industrial operations. As the company is currently expanding the industrial component of the business and introducing new production lines, substantial efforts are being made to ensure that operational procedures and OHS measures are appropriate for the scale of operations and in line with best practices. An external study was recently conducted to assess and improve the existing OHS procedures, recommend additional measures and provide training on specific areas.

Miro has conducted **risk assessments** for main activities that identify potential hazards and define mitigation measures in terms of protective equipment, trainings and additional controls. All employees are provided with the necessary protective equipment and are trained as per a schedule that is updated annually and covers a wide range of subjects, such as technical and machinery operations, chemicals, fire control, first aid and road safety.

Furthermore, Miro has developed a number of additional management and action plans to address specific matters that require particular attention, the most important being:

- **Emergency preparedness and response plans:** with procedures for medical emergencies, evacuations, agrochemical exposure, natural disasters and utility failures.
- **Fire management plans:** with assessment of fire risks, response procedures and management measures.
- **Road safety management plans:** with driver rules and provisions for driver recruitment, vehicle checks and community awareness. Miro has faced serious difficulties to ensure road safety in Ghana, with two fatal accidents over the past two years. To address this the company has done a full review of the measures in place with external support and has introduced important improvements and new measures.

More recently the company has been working on new procedures to improve controls on third parties (suppliers and contractors) and is developing gender assessments and action plans for both countries.

#### 2.2.4 Conservation and biodiversity

In order to complete baseline information collected in the ESIA process, Miro has conducted additional **biodiversity baseline studies and high conservation value assessments** in the project areas. Before the start of operations on a new compartment, Miro conducts field visits and assessments to identify areas that will be set aside for conservation. These include natural forests, wetlands, buffer zones along water courses, cultural sites and other areas where high conservation values are identified.

Miro has developed a natural resources manual with **conservation management prescriptions** to ensure that operations do not cause land degradation and prevent adverse environmental impacts. These include measures related to identification of conservation areas, operations, biodiversity studies and records, erosion control and restoration. A separate environment and conservation manual with prescriptions for the identification, management and monitoring of high conservation values is also in place. Furthermore, security personnel are employed to patrol project areas and control any illegal activities.

#### 2.2.5 Stakeholder engagement and grievance mechanisms

In addition to the information collected in the ESIA process, Miro has conducted additional **livelihood studies, development plans and vulnerability assessments** as part of its efforts to understand the local socioeconomic context and mitigate adverse impacts. The company collects primary data on social baseline and conducts community mapping and cultural heritage surveys as part of framework that is applied for all new land developments.

Miro has a **stakeholder engagement plan** in place that includes:

- Mapping and analysis of stakeholders
- Engagement methods and frequency
- Roles and responsibilities
- Analysis of main concerns and mitigation measures
- Documentation and information management

The system is effectively implemented and well documented. Community liaison officers meet with the stakeholders on a regular basis, following a schedule of planned meetings that is updated annually. As a result Miro has established strong relations with stakeholders and has broad community support in both countries.



Miro also develops **Corporate Social Responsibility** activities that are designed based on needs assessments. Projects focus on infrastructure, access to water, education and agriculture, as well as health awareness and environmental sensitization campaigns. Since 2019 the company is also developing a pilot forestry smallholder programme.

Miro has in place internal and external **grievance mechanisms** that are effectively implemented. The mechanisms offer several channels for the communication of grievances, which include boxes in the company facilities and communities allowing for filing anonymous grievances. The company has developed written procedures that define internal mechanisms and responsibilities to investigate and respond to grievances and tools for record and documentation. The mechanism is also explained to employees and local communities.

### **2.2.6 Monitoring**

Miro monitors a broad number of environmental and social parameters. The specific indicators to be measured and studies to be conducted, internal responsibilities and frequency are integrated in the relevant plans and procedures. Many of these indicators are captured in a monitoring database that is updated on a monthly basis. Monitoring results are reported internally and as necessary to external parties, such as national authorities, investors and auditors.

Since this is an essential part of the ESMP recommendations, the **General Monitoring Prescriptions** are available in ANNEX 1.

# **ANNEX 1      General Monitoring Prescription**

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# Miro Management System

Document

MMS Manual

Subject

Monitoring

## 1 Scope

This procedure covers the effective monitoring of all significant aspects identified in all operations and activities in the company Integrated Management System.

## 2 Objective

The objective of this procedure is to ensure, that all significant aspects of the IMS are being effectively and efficiently monitored.

## 3 Legal Compliance Requirements

Field operations shall comply with all [national laws](#) and codes of practice. Where no such code exists, the operation shall comply with the "[ILO - Code of Practice on Safety and Health in Forestry](#)"



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## 4 Operational Control

### 4.1 General Monitoring

1	Divisional Managers shall monitor and measure all the significant impacts/risks/hazards, and quality requirements that have been identified in the monitoring report.	Q
2	Every System Procedure and Forest Management Prescription shall identify records kept (section 7) as a result of monitoring requirements covered by that procedure or prescription.	Q

### 4.2 Monitoring of Significant Impacts

Monitoring shall include the monitoring of the following aspects:

#### 4.2.1 Human Resources

##### 4.2.1.1 Employment Statistics

1	Human Resource Managers shall record data relating to employment as follows: 1) Age 2) Gender 3) Origin (home location) 4) Type of contract (permanent / contractor / casual / seasonal)	Q
2	These shall be summarised per operation on a monthly basis in the monitoring report.	Q

##### 4.2.1.2 Staff Development

1	Human Resource Managers should monitor the number of employees trained, and the type of training done. This shall be done comparing budgeted training to actual completed and include management training, own staff and contractor staff.	Q
2	This shall be summarised per operation on a monthly basis in the monitoring report.	Q

##### 4.2.1.3 Employee Grievances

1	Employer grievances and their resolution shall be monitored.	EQ
2	This shall be summarised on a monthly basis in the monitoring report.	Q

##### 4.2.1.4 Potable Water Quality Monitoring

1	OHS Officer's shall take samples of water supplied to employees for drinking, and these samples shall be analysed using the company water analysis equipment or at a national testing lab. This analysis would normally consist of a minimum of E. Coli and / or Total Coliform counts.	S
2	The results of these samples shall be checked to determine if the water being supplied for drinking meets WHO standards for potable water. The laboratory should specify this in the results.	S
3	Employees / communities shall be advised of the results of this water testing, and where water is not fit for human consumption.	S

##### 4.2.1.5 Safety and Health

###### 4.2.1.5.1 Accidents and Emergencies

1	All operations shall monitor the number, extent and causes of any accidents and incidents to machinery, personnel, and property. E.g. fire reports, lost time injury reports, machinery breakdowns/down time.	SQ
2	This shall be summarised per operation on a monthly basis in the monitoring report.	S

##### 4.2.1.6 Occupational Health

###### 4.2.1.6.1 Pre-employment Medical Examinations

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1	Line Managers shall ensure that all personnel employed go through a pre-employment medical before they are employed.	<b>S</b>
2	The purpose of this medical shall be: <ul style="list-style-type: none"> <li>➤ To identify an existing illness or disability that may result in the employees further deterioration resulting from his intended work.</li> <li>➤ To confirm the suitability of the intended employee for the intended work.</li> </ul>	<b>S</b>
2	This shall be summarised per operation on a monthly basis in the monitoring report.	<b>S</b>

#### 4.2.1.6.2 Clinic Statistical Monitoring - General Attendance's

1	Where the company operates clinics, each clinic should monitor the number of people attending the clinic for treatment. This may be split according to: <ul style="list-style-type: none"> <li>➤ employee/dependant/external to the company,</li> <li>➤ male/female</li> <li>➤ adult/juvenile</li> <li>➤ illness/injury/disease</li> <li>➤ type of treatment required</li> </ul>	<b>Q</b>
2	This shall be summarised per operation on a monthly basis in the monitoring report.	<b>S</b>
3	Where the company operates clinics, this shall be summarised per operation on a monthly basis in the monitoring report. Where the company does not have clinics efforts should be made to acquire this information on an annual basis and record these statistics in the report.	

#### 4.2.1.1 Health Education

1	Each operation should monitor the number of people (from both employee and community populations) trained on health education issues, and the type of training done.	<b>Q</b>
2	This shall be summarised per operation on a monthly basis in the monitoring report.	<b>S</b>

### 4.2.2 Operational Management

#### 4.2.2.1 Land Utilisation

1	Forest Operations shall monitor on an annual basis the amount of forest currently under the various forest types, as well as land used for roads, infrastructure, recreation, fire protection and land left under indigenous vegetation.	<b>E</b>
2	Further to this forest operations shall monitor on a monthly basis the areas of forest felled in hectares, the volumes of timber / quantity of forest produce (by species) extracted from the forest in cubic metres / product numbers, and areas re-established or planted in hectares, this includes crop failed replanting.	<b>EP</b>
3	The survival of planted areas shall be assessed and reported on a monthly basis.	<b>Q</b>
4	Results of this monitoring shall be recorded in the Monitoring report.	

#### 4.2.2.2 Weed Control

1	Forest Operations shall monitor on a monthly basis area weeded against APO's. Results of this monitoring shall be recorded in the Monitoring report.	<b>EQ</b>
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#### 4.2.2.3 Soil Analysis

1	Soil analysis shall be done on each new compartment to be established.	<b>PEQ</b>
2	Results of soil analysis shall be mapped into the GIS database and use in pre-harvest and establishment assessments.	<b>PEQ</b>

#### 4.2.2.4 Pesticides and Chemicals

1	All operations shall establish and maintain chemical registers.	<b>EQ</b>
2	The registers shall detail, either in kilograms or litres the quantities of chemical received from a supplier, the quantities in stock and the quantities issued for application.	<b>E</b>



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3	The operation shall monitor the rate of application and where chemicals are applied to land the area onto which chemicals are applied. This information should be recorded by catchment, where applicable.	E
4	The above information shall be captured in Microforest, and summarised in the Monitoring report.	EQ

#### 4.2.2.5 Fertilizer Use

1	All operations shall establish and maintain fertilizer use registers.	EQ
2	The registers shall detail, either in kilograms or litres the quantities of fertilizer received from a supplier, the quantities in stock and the quantities issued for application.	E
3	The operation shall monitor the rate of application and where fertilizers are applied to land the area onto which they are applied.	E
4	The above information shall be captured in Microforest, and summarised in the Monitoring report.	EQ

#### 4.2.2.6 Forest Damage

1	All incidents of damage to the forest areas, whether this is through fire, drought, wind insect, termite or mammals shall be monitored with the number of incidents and area damaged being reporting in the Monitoring report.	EQ
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#### 4.2.2.7 Pest Control

1	Where pest infestation occurs the relevant operation shall monitor and measure the effect of the infestation.	E
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#### 4.2.2.8 Electricity Generation

1	The method of power generation shall be recorded in the relevant PMP, this may include: <ul style="list-style-type: none"> <li>➤ Power supply utility,</li> <li>➤ Diesel Generator,</li> <li>➤ Bio-fuel (e.g. wood waste),</li> <li>➤ Wind, hydro or other source of clean fuel generated on site.</li> </ul>	E
2	Where operations use significant quantities of power (for example processing plants), these operations shall monitor consumption on a monthly basis.	E

#### 4.2.2.9 Fuel and Oil Consumption

1	All operations shall monitor the volumes of fuels and oils received from a supplier in litres, and the volumes issued per vehicle or machine in litres on a monthly basis.	EQ
2	This shall be summarised in the Monitoring report.	PQ

### 4.2.3 Environment

#### 4.2.3.1 Water Monitoring

1	Stream quality monitoring shall be conducted on significant streams and rivers on an annual basis, with the results being recorded on the months conducted in the Monitoring report.	E
2	Steam flow monitoring will be conducted on a quarterly basis	

#### 4.2.3.2 Rainfall

1	All forest operations should monitor rainfall received in millimetres on a daily basis.	E
2	A histogram reflecting the monthly amount of rainfall received for each year should be updated maintained and summarised in the monthly report.	E

#### 4.2.3.3 Waste

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1	All operations shall establish a list of wastes generated, per location, and monitor the quantity of waste generated by their operations per annum.	E
2	Where this is process waste, estimates of quantities generated may be used, e.g. truck loads, cubic metres per hectare, recovery rates, and estimates of standing timber volume against actual volume extracted.	E

#### 4.2.3.4 Air Emissions

1	All operations with identified significant emissions shall conduct surveys to establish their air emissions, those with significant air emissions shall monitor the quality of their emissions on an annual basis.	E
2	Volumes of emissions may be calculated from single annual measurements extrapolated over the year.	E

#### 4.2.3.5 Water Effluents

1	All operations with identified significant effluents shall test or have tests done on these effluents as per permit requirements.	E
2	The methodology for calculating volumes should be determined by qualified personnel.	E
3	Volumes of effluents can then be extrapolated to calculate annual volumes.	E

#### 4.2.3.6 Environmental Assets

1	All forest operations shall monitor the impact of forest operations on all significant: <ul style="list-style-type: none"> <li>➤ biodiversity,</li> <li>➤ cultural, historical, religious and recreational sites, detailing the size and significance of each site shall be recorded annually in the Monitoring Database..</li> </ul>	E
2	The results of environmental asset monitoring, particularly the result of HCV monitoring shall be reported on, on an annual basis (EPA annual reports).	E

#### 4.2.3.7 Noxious weed Control

1	All forest operations shall monitor noxious weed infestations and their control on an annual basis, with the result of control being reported in the Monitoring Report.	E
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#### 4.2.4 Social Aspects (Consultancy and Communication, and Stakeholder Consultation)

2	Stakeholder complaints and their resolution shall be monitored.	E
3	Social / community upliftment programmes shall be monitored.	E
4	Illegal activities and their control shall be monitored, these may include: <ul style="list-style-type: none"> <li>➤ Illegal logging,</li> <li>➤ Illegal flora and fauna removal,</li> <li>➤ Illegal hunting and fishing, and</li> <li>➤ Illegal land occupation and / or access.</li> <li>➤ Illegal charcoal production</li> </ul>	E
4	The results of this monitoring shall be summarised monthly in the Monitoring report.	Q

### 4.3 Common System Monitoring

#### 4.3.1 Audits

1	The progress of internal audits against the internal audit schedule shall be monitored on a monthly basis.	Q
2	Audit findings and correction of non-conformance (for both internal and external) shall be monitored on a monthly basis.	Q
3	The results of this monitoring shall be summarised monthly in the Monitoring report.	Q



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### 4.3.1 Job Observations

1	The number of job observations shall be monitored against scheduled job observations monthly and reported in the Monitoring report.	Q
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### 4.3.2 Corrective Actions

1	The number and type of Corrective Action Requests shall be monitored on a monthly basis.	Q
2	Progress in correcting non-conformances, and carrying out preventative action shall be reported in the Monitoring report.	Q

### 4.3.3 Document Review

1	Where documentation has been found to be in need of review, the number and type of corrections made shall be monitored on an annual basis in the Sustainability Report.	Q
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## 4.4 Results of Monitoring

1	The results of all the above monitoring and measurement shall be reviewed per operation on an annual basis based on data input into the monitoring database. (EPA Annual Reort).	Q
2	Where necessary these reviews may be available to customers or members of the public.	Q
3	The results of this monitoring shall be reported on in the annual sustainability report based on the requirements of the company reporting format.	Q
4	Any further monitoring done in terms of individual procedure requirements will be recorded as per that procedure.	Q





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## 5 Responsibility

The following positions are responsible for ensuring compliance with this procedure:

Second Level Supervisor:

**EHSS Director**

First Level Supervisor:

**COUNTRY GENERAL MANAGERS**

Operational Monitoring:

**OPERATIONAL SUPERVISORS &  
COMPLIANCE MANAGER**

## 6 Appendix

## 7 Records

Record	Responsibility	Where kept	Retention
Various Reports	Country General Managers	Annual Report Files	5 years
Monitoring Report	EHSS Manager	Softcopy files	5 years

## 8 References

FSC Principles and Criterion: 8.1, 10.1

## 9 Definitions