

Miro Response to Swedwatch Report

Proposed statement for publication | September 2026

"We take the concerns reported by Swedwatch seriously and will act immediately where action is warranted. At the same time, we do not agree with the report's overall characterisation of Miro or our relationships with communities. We have urged Swedwatch to widen its evidence base and to take fuller account of the many communities with which we have positive, long-standing relationships and where there is clear evidence of strong support for Miro's presence and activities. Our response will be to investigate the concerns, engage directly and openly, and improve where improvement is needed. We continue to encourage all stakeholders to utilize our well established channels for any concerns they may have."

Anthony Gaydon, Chief Executive Officer

Miro takes its responsibilities to its employees, neighbouring communities, landowners and land users seriously. Maintaining strong relationships with the communities around our operations is fundamental to our business, and we listen carefully when concerns are raised.

We have engaged with Swedwatch during the preparation of its report and provided information on our land acquisition processes, community engagement, employment, health and safety, environmental monitoring and benefit-sharing arrangements.

We are concerned, however, that the report draws broad conclusions about Miro's operations based primarily on qualitative interviews in six communities. We do not dismiss the experiences of those interviewed. Where concerns have been raised, we will seek to understand and address them. At the same time, we do not believe that these accounts provide a sufficiently broad evidence base from which to draw conclusions about Miro's relationships with communities across our wider operational area. We have therefore encouraged Swedwatch to broaden its evidence base and engage with a wider cross-section of communities.

Some of the issues raised in the report also relate to land agreements and circumstances dating back more than a decade. Sierra Leone's legal framework, Miro's operations and international expectations regarding land acquisition and community engagement have developed substantially during that period. It is important that historical arrangements are considered in the legal and operational context in which they were established.

Miro's own approach has evolved significantly over that time. We worked closely with Namati to strengthen our land acquisition and community engagement processes, including developing additional agreements with landowning families to provide for more direct participation and payment. These processes were reviewed and commended by Namati and recognised as good practice at the time. Miro has sought to remain at the forefront of improving land and community engagement practices as legislation and international expectations have developed.

Equally, we recognise that this process of improvement must continue. The concerns raised through Swedwatch provide an opportunity to test whether our current processes are working as intended, understand where concerns may not be reaching us through our established engagement channels, and make further improvements where they are needed.

Comment from George Catterick, Country Manager

“We have long-standing and positive working relationships with communities across our operational area, and maintaining those relationships has always been integral to how Miro operates. Our Community Liaison Officers are based in and around the communities we work with and provide established, trusted channels through which concerns can be raised and addressed. Miro has seven Community Liaison Officers covering 118 communities.

The grievances described in the Swedwatch report have not previously been raised with us through these established channels, which is a concern. We will act on the issues identified in the report, engage directly with the communities concerned and seek to understand why these concerns have not reached us through our existing processes.

Good community relationships are fundamental to the long-term success of our business. We will continue to invest in those relationships and will strengthen our processes where the Swedwatch findings identify gaps in communication, escalation or follow-up.”

George Catterick, Country Manager

The table below responds to the principal and material allegations concerning Miro raised in the Swedwatch report. It sets out the relevant facts and Miro’s position based on our records, established processes and records, together with the immediate actions we will take where further investigation or improvement is warranted.

This response is purposefully focused on Miro’s operations and relationships with its employees, landowners, land users and neighbouring communities. It does not seek to respond to the report’s broader commentary on the voluntary carbon market, nor to matters concerning South Pole or other organisations referenced in the report.

Issue raised	Relevant facts	Miro position	Immediate action
Historical land consultation and community participation	The original 2011 lease was entered into and formally registered under the legislation in force at the time. Miro subsequently worked with Namati to develop the Developed Land Acknowledgement Agreement (“DLAA”) process, enabling more direct engagement with landowning families and direct payment of rent. Land-use and land-user mapping form part of the land development process. Miro operates on a willing-lessor, willing-lessee basis and has not proceeded where consent to development has been withheld. A total of 28 DLAA’s have been signed with communities within the original 2011 lease areas. Miro has directly engaged and signed individual land agreements with 113 landowning families within the three main chiefdoms of operation. Of the 21,000ha leased in 2011, only about 2,700 hectares has been developed representing only 13% of the total leased land. Although only 13% has been developed, Miro paid surface rent on the entire 21,000 hectares signed since 2012. Total payments to landowners of unutilized land is over \$500,000 over the past 10 years.	Miro does not agree that its land acquisition approach has relied simply on traditional authorities without engagement with landowning families and communities. In fact, Miro deliberately moved away from a more traditional, hierarchical approach to land leasing towards direct, grassroots engagement with landowning families and affected communities, developed in conjunction with Namati. This represented a significant change to established practice at the time and was not without resistance, including from individuals who had previously held greater influence over land negotiations and associated payments. Miro nevertheless maintained the approach because it considered more direct participation and payment to landowning families to be fairer and more transparent. The approach was subsequently reviewed and commended by Namati and recognised as good practice at the time. Miro also recognises that standards and legislation have continued to evolve and that its approach must continue to develop accordingly.	Continue reviewing land tenure and engagement processes against the Customary Land Rights Act and current good practice; with particular attention to women, land users and other groups that may not be adequately represented through traditional structures.
Community awareness of carbon credits and lease duration	The carbon project was developed after some of the original land agreements. Later agreements included provisions relating to carbon credits. Miro undertook stakeholder engagement during the development and validation of the carbon	Miro does not accept the suggestion that communities were not consulted or informed about the carbon component of the project. Miro has records of stakeholder engagement undertaken during the development and validation of the carbon project, including	Miro will review and update its carbon communication materials and community engagement programme to ensure that they reflect the carbon project as it operates today. This will include clearer, accessible information

Issue raised	Relevant facts	Miro position	Immediate action
	project, including information sessions, visual materials, workshops, village mapping and women-only mapping exercises. Meetings and workshops were held in about 25 communities across the three main chiefdoms of operations. These meetings brought together about 450 landowners, land users and community stakeholders. These extensive consultations were held during the carbon credit project inception stage in 2020. Miro's Community Liaison Officers have consistently brought carbon credit as a topic of discussion in their monthly community meetings and routine engagements.	information sessions, workshops and a targeted communication programme using visual and accessible materials. The interviews reported by Swedwatch do, however, indicate that some community members do not currently have a clear understanding of carbon credits or how the carbon component relates to Miro's forestry operations and community benefits. We take this seriously, but do not believe that current levels of understanding can reasonably be taken as evidence that consultation did not occur.	on how carbon credits are generated and sold, the relationship between carbon revenue and profit, and how communities participate in and benefit from the project. Communication on carbon will be treated as an ongoing engagement process, with information updated as the project and carbon market develop.
Land access, livelihoods and compensation	Detailed land-use and land-user studies are undertaken before development, including mapping of farming areas, grazing, natural-resource use and the collection of non-timber forest products. Areas identified as important to community livelihoods, including farm bush, swamps and grasslands, are not included in the lease and left undeveloped. Where land development affects existing economic resources or recognised uses, compensation is provided in accordance with the applicable arrangements and national framework, alongside ongoing lease payments to landowners. Community	Miro does not accept the characterisation that plantation development has taken place without consideration of existing land uses or that communities are routinely denied access to leased areas. Detailed land-use and land-user studies are undertaken as part of the development process, including consideration of how communities use the land for farming, grazing and the collection of non-timber forest products and other natural resources. Community access to plantation areas is not generally prohibited. Controls are applied where necessary to manage legitimate operational risks, including fire prevention,	Review specific claims relating to land access, economic trees, compensation and livelihood impacts against land-use maps, payment records and other available evidence. Engage directly with affected households where follow-up is required.

Issue raised	Relevant facts	Miro position	Immediate action
	access to plantation areas is not generally prohibited, although proportionate controls are applied where necessary for operational safety, fire prevention and security. Only about 13% of the original hectares of 21,000 has been developed. Yet, close to \$500,000 has been paid on the undeveloped area over the past 10 years of Miro's operation. Miro currently pay over \$250,000 in land rent alone directly to landowners on an annual basis.	security and worker and community safety, but these controls should not be interpreted as a general restriction on community access. Miro recognises that plantation development changes patterns of land use and that impacts can differ between households and individual land users, which is why understanding existing uses and maintaining ongoing engagement form an important part of the land development process.	
Benefit sharing and financial transparency	Existing agreements provide for a community development fund based on a percentage of net profit attributable to the relevant land. The conditions necessary to generate payments under the existing profit-based mechanism have not arisen. Miro has recognized this and is committed to reviewing a revenue-based benefit-sharing mechanism from January 2027 as a possible alternative.	Miro does not agree that community funds that have become payable have been withheld. It does recognise that a profit-based mechanism is difficult for communities to understand and does not provide the level of predictability or transparency expected from a benefit-sharing arrangement.	Review the implementation of a new revenue-based mechanism as an alternative to the current profit sharing mechanism. Improve communication on how benefits are calculated, how funds will be governed and how communities will participate in decisions over their use.
Women's participation and access to employment	Miro has introduced dedicated women-only consultation groups, gender impact assessments, women-only components of village mapping, female participation targets for mapping workshops and efforts to recruit female Community Liaison Officers. Swedwatch reports low female employment within the six communities it visited.	Miro recognises that women can face structural barriers to employment and participation in community decision-making. However, female employment cannot be considered solely as a question of recruitment numbers. Miro has previously sought to increase female employment, including through targeted recruitment measures. Experience has shown that, in some communities, allocating highly sought-after employment opportunities specifically	Continue efforts to improve women's access to employment while assessing the wider gender and community dynamics associated with recruitment. Review the experience of previous targeted recruitment measures, including any associated GBVH risks, and ensure that future approaches are informed by appropriate gender and safeguarding assessment rather than

Issue raised	Relevant facts	Miro position	Immediate action
	Miro employs approximately 2,200 workers, of whom 23.5% are women. Miro has set a target to increase female representation to 30% of the workforce over the next three to five years. Globally, women account for approximately 25% of formal forestry employment, Miro has a target to exceed this. Miro has set up women's group across the operational area. These groups are engaged separately from the general community meetings every month.	to women can interact with existing household and community gender dynamics and may create unintended risks, including reports or concerns relating to GBVH. These factors require careful management and illustrate why female employment figures need to be understood within their wider social and community context.	relying on numerical employment targets alone.
Working conditions and occupational health and safety	Miro has a dedicated OHS team, provides safety training and PPE, operates an onsite clinic and commissions annual industrial hygiene assessments. The external environmental and social review referred to by Swedwatch reported a strong safety culture. Miro's 2025 and 2026 safety data show low Lost Time Injury Frequency and Total Recordable Injury Frequency rates. Miro continuously strives to improve its health and safety, this is done through robust OHS risk mitigation regimes, the KPI's for which are number of lost time injuries (LTI's) and Lost Time Injury Frequency Rates (LTIFR). The LTIFR for Miro has reduced over the past five years, in 2026 this was 0.09, well below the global agriculture and forestry industry average of between 2 and 7 (for every 1 million hours worked). This year the company has	Miro does not believe that the individual accounts presented provide evidence of generally poor health and safety performance. However, individual injuries and concerns raised by workers must be investigated on their facts.	Review the individual cases identified in the report. Investigate any unresolved concerns relating to injury management, PPE, medical treatment or employment conditions and take corrective action where required.

Issue raised	Relevant facts	Miro position	Immediate action
	recorded three LTI's, all of which have been investigated thoroughly including a root cause analysis.		
Grievance mechanisms and community relationships	Miro has formal grievance mechanisms for employees and communities. Employee channels include grievance forms, suggestion boxes and anonymous channels. Community engagement is supported by Community Liaison Officers, community management staff, the Landowners Committee and other engagement forums. A total of 36 community grievances were registered in the last 24 months; 89% have been successfully closed and the remainder are being actively managed. The company strives to close grievances within 21 days of receipt and has a robust system to deal with the. Miro currently has six Community Liaison Officers and a Senior Community Officer covering all the operational areas, all of whom are from the local area. Miro leases land from 118 communities. Community Liaison Officers hold at least one meeting every month in each of the communities. Apart from these formal scheduled meetings, there are other informal meetings.	A number of the grievances described by Swedwatch have not previously reached Miro through its established engagement and grievance channels. Miro therefore wants to understand why these concerns were not identified or escalated through existing processes.	Review the accessibility and effectiveness of grievance channels, including how grievances are recorded, escalated, responded to and closed. Assess whether women, youth, non-landowners and other groups have sufficiently direct and trusted routes to raise concerns.
Chemical use and	Agrichemical use is governed through Miro's environmental and OHS management systems and is subject to	Miro rejects allegations that its operations have contaminated community water sources. It nevertheless recognises that	Investigate any specific contamination allegation raised through the Swedwatch process. Continue quarterly water

Issue raised	Relevant facts	Miro position	Immediate action
environmental monitoring	regulatory and FSC oversight. Miro conducts quarterly water-quality monitoring of surrounding rivers, streams and boreholes. Testing is undertaken through Sierra Leone EPA laboratory facilities and information is provided to the EPA and National Water Resources Management Agency. A minor FSC non-conformity relating to chemical storage identified in 2024 was formally closed in 2025. Agrichemical, mainly weedicide is only applied within the first 24 months of the life of the trees. The application rate at this stage is around 2kg/ha. Beyond age 2 years, Miro adopts manual weeding as the principal mode of weed control throughout the plantation. There are three stream and river systems going through the plantation. Miro ensures that there is a 30m buffer between the boundary of the plantation and highwater mark of the rivers or streams. Where the plantation borders and swamp land which are normally farmed by the communities, Miro ensures a 10m buffer between the plantation and the swamp.	concerns regarding chemical use exist and should be investigated where specific allegations are made.	monitoring and strengthen communication with communities on chemical use and water-quality results.

Comment from Joe Conteh, Landowner and Key Stakeholder

I write as a land owner and signatory to the lease agreement between Miro Forestry and the Makorie/ Mateti communities. Having gone through the Swedewatch / SILNoRF report and the allegations made against Miro on the following issues:

“Loss of access to land and disruption of natural resource-dependent livelihoods;

Disproportionate impact on small scale women farmers;

Lack of meaningful community participation and FPIC;

Lack of financial transparency and inequitable benefit sharing;

Labor rights violation;

Environmental impacts affecting communities”;

I want to categorically refute the above allegations as baseless and unfounded in all of the communities in which they operate.

Let me hasten to add that Miro complies with all national legal requirements as well as best international practices. I also want to add that the Ministry of Labor has a Factory Inspectorate Division which ensures factories comply with our laws as well as the best international practices.

Joe Conteh – Landowner and Key Stakeholder

Miro believes that relevant historical context should be considered when assessing the community testimony presented in the report. The move towards direct, grassroots engagement with landowning families changed established relationships around land negotiations and the distribution of associated payments. This approach reduced the role and financial influence of a small number of individuals who had previously occupied influential intermediary positions, and there was significant resistance to these changes at the time.

Miro understands that some individuals associated with this historical opposition to its approach have subsequently been involved in facilitating SILNORF’s engagement with communities for this research. We believe this is relevant context when considering how communities and interviewees were identified and the resulting evidence base. It does not invalidate the experiences or concerns reported by individual interviewees, which Miro will investigate. However, given the report’s reliance on qualitative evidence from six communities, we believe greater transparency regarding community and participant selection, and engagement with a broader cross-section of communities, would provide a more balanced basis for conclusions about Miro’s operations and community relationships.

Miro is committed to open and constructive engagement. Anyone with questions about the issues raised in the Swedwatch report, or about Miro’s operations more generally, is welcome to contact the company directly at info@miroforestry.com. We are happy to respond to enquiries and provide further information where appropriate.