

South Pole's Response to the Swedwatch & HEKS/EPER report *Uprooted causes: A case study of carbon credits, land rights and community impacts in Sierra Leone*

September 3, 2026

South Pole has seen the report and its recommendations. To ensure an accurate public record, South Pole is providing additional context regarding our role, accountability, and the governance frameworks applied to the Miro Sierra Leone (MIRO SL) project.

Our role

The MIRO SL project comprises two distinct operational components that should not be conflated:

- Sustainable Timber Operations: Managed and operated by Miro Forestry Sierra Leone (MFSL).
- Carbon Sequestration Activity: Certified under Verra's Verified Carbon Standard (VCS), covering just over half of the total plantation land area. Carbon credit generation is strictly limited to targeted afforestation and reforestation activities on land meeting the standard's eligibility criteria for tree cover.

South Pole has acted as the **carbon asset developer and consultant** for the carbon component of the project on behalf of the project owner and implementer, MFSL. In that capacity, South Pole's role is limited to preparing the Project Design Document (PDD) and monitoring reports submitted to Verra, assisting with the carbon validation and verification process under VCS requirements, and commercializing generated credits. South Pole is **not involved** in commercial timber management, plantation operations, land acquisition or lease negotiation which are subject to FSC oversight. Those matters rest with MFSL, which has responded separately.

Certification and due diligence

The project was developed against the VCS requirements applicable in 2021 and validated and verified by accredited independent Validation and Verification Bodies (VVBs), with a crediting period of 30 years (from 16/05/2016 to 15/05/2046). The project underwent two successful verifications and it has been reviewed and validated by independent VVBs and Verra's officers at each monitoring period, as outlined in the publicly available documentation on the [Verra registry](#).

Verra, the carbon standard, retains sole authority over project registration and credit issuance; South Pole cannot issue credits unilaterally.

We also recognise that third-party certification does not substitute for our own due diligence. Since this project was registered, South Pole has established an independent Risk function, and rolled out a Quality Management Framework that obtained independent assurance. Through our framework, we are performing a more stringent screen, beyond what the carbon standards themselves require. This project was subject to internal reviews in addition to the requirements of the carbon standards.

Project outcomes

Scrutiny is vital for progress, but a balanced assessment must also recognize tangible impacts. The project has delivered 482,771 tonnes of verified carbon removals to date. In addition, as mentioned in the report, reforestation under the MIRO SL project has delivered community-confirmed environmental benefits, including increased tree cover, cooler local temperatures and improved moisture retention in the project area.

Ongoing engagement

As a carbon asset developer, we remain committed to adhering to the requirements of carbon standards and South Pole's own quality requirements. We understand Miro is considering a change to its benefit-sharing agreements, moving toward a revenue-based model. We support that direction and will continue to engage with Miro on community engagement regarding the carbon component of the project.

We continuously refine our broader portfolio management and engage directly with project partners and standard bodies to advance high integrity, robust governance, and meaningful local impact. The voluntary carbon market is in transition toward stronger safeguards and higher integrity methodologies – the VCS requirements for stakeholder consultations, for example, continue to evolve and these new requirements are systematically carried into carbon project development. We support that direction.

For more information on how we uphold our commitment to integrity, please visit the [South Pole website](#).