



June 12, 2023

U.S. International Development Finance Corporation
1100 New York Ave NW
Washington, DC 20527

To whom it may concern:

Thank you for the opportunity to comment on the U.S. International Development Finance Corporation's (DFC) consideration of support for the Miro Forestry Project in Ghana and Sierra Leone. Friends of the Earth Ghana is quite familiar with the Ashanti region forest landscape and all the Boumfoom, Chirimfa, Awura, Abrimasu, and South Formangso Forest Reserves where the Miro Project operates. Friends of the Earth United States and Friends of the Earth Ghana would like to raise the following concerns regarding issues related to the project:

Risk of Deforestation and Biodiversity Loss

As we have seen with past environmental and social impacts assessments (ESIAs) of similar projects, this [ESIA](#) fails to properly assess the potential impacts on biodiversity and critical ecosystems. There is no analysis (or mention) of which (if any) endemic threatened species will be affected and how, whether there is the presence of any free-flowing rivers, and how other sensitive ecosystems will be impacted. It mentions primary forests, but not in depth:

Wetlands and fragmented indigenous forests within plantation estate are surrounded by cleared 10m buffer areas. Biodiversity reserves and high conservation value areas were visited. This includes primary / secondary forest remnant patches and a number of wetlands within the plantation blocks. These areas were separated via appropriate buffer zones, particularly around riparian areas.

While buffer zones are important, the bigger problem could be reduced connectivity in the ecosystem if the area becomes more fragmented by the project. Insufficient analysis has been conducted to understand the impacts of cutting off certain areas from others and whether the measures taken will be sufficient to protect against negative impacts on biodiversity. This is especially important because buffer zone laws are rarely adhered to due to poor monitoring by the Forestry Commission and Ghana's Environmental Protection Agency. Therefore, plantations projects in Ghana have often led to deforestation, habitat loss, and ecological connectivity loss.

Past Evidence of Harm

Projects similar to the Miro Project have resulted in negative impacts on the environment and local communities. Most plantations in Ghana have resulted in land grabbing, loss of farming land and water resources for forest-dependent communities, and conflicts between communities and palm oil and timber companies. From what we have seen with other forest plantation projects, their impacts tend to evolve or intensify with time or as the company expands its operations. Therefore, the company needs to maintain effective engagement to identify and



address the changing impacts of their operations. Unfortunately, sometimes, companies are reluctant to do this, knowing that no government agency will be monitoring their operations. Friends of the Earth Ghana and other civil society organizations in Ghana will attempt to visit their fields of operation and the communities to map and report on these changes.

Recommendations

Due to past impacts of forestry projects and the insufficient impact analysis, we strongly urge DFC to ensure:

- Stronger protections against deforestation and biodiversity loss;
- Rigorous monitoring of the Miro Project's operations;
- Stronger protection measures and safeguards are put into place;
- Continuous (or at least periodic) engagement with forest communities; and
- A revoking of support (should such support be approved) if negative impacts are found and not addressed.

We appreciate you taking the time to review these concerns and look forward to discussing them further.

Sincerely,

Friends of the Earth Ghana
4 Adamafo Close, East Legon
Accra, Ghana

Kate DeAngelis
Senior International Finance Program Manager
Friends of the Earth U.S.
1101 15th Street NW, 11th Floor
Washington, DC 20005
kdeangelis@foe.org