



Environmental & Social Monitoring Report Q4 2019

Akumadan and Tain II Plantations





Form Ghana

Address	P.O Box SYI 211,Sunyani -Ghana
Telephone	+544441440
Email	w.fourie@formghana.com
Website	www.formghana.com
Document version	2
Date of document	13-01-2020

CONTENTS

1. EXECUTIVE SUMMARY	3
1. INTRODUCTION	4
2. COMPANY PROFILE	4
2.1. Company details	4
2.2. Environmental permits and certification	4
2.3. Environmental and social legislation.....	5
2.4. Work force	5
2.4.1. Overall work force.....	5
2.4.2. Organization for the environmental and social monitoring.....	6
2.5. Description of company activities	7
2.6. Description of company planting activities during the reporting period	10
3. BACKGROUND OF THE AFDB'S INVOLVEMENT.....	11
4. REPORTING ON COMPLIANCE TO OPERATIONAL SAFEGUARDS	13
4.1. Operational safeguard 1: Environmental and social assessment	13
4.1.1. Developments on the E&S and ESMP during the last report	15
4.1.2. Third party verification on management in place	16
4.1.3. Conclusion on compliance with OS-1	16
4.2. Operational safeguard 2: Involuntary resettlement, land acquisition, population displacement and compensation	17
4.2.1. Summary of involuntary resettlement and compensation plans	17
4.2.2. Update of the current resettlement situation	19
4.2.3. Livelihood restoration / improvement	22
4.2.4. Distribution of benefit sharing	23
4.2.5. Community project development activities	23
4.2.6. Consultation, sensitization and grievance redress mechanism	24
4.2.7. Intercropping.....	25
4.2.8. Conclusion on compliance with OS-2	25
4.3. Operational safeguard 3: Biodiversity, renewable resources and ecosystem services	26
4.3.1. Impacts on biological diversity and ecosystem services	26
4.3.2. Carbon sequestration	27
4.3.3. Conservation of habitats and biodiversity	27
4.3.4. Renewable resources	30
4.3.5. Conclusion on compliance with OS-3	30
4.4. Operational safeguard 4: Pollution prevention and control, hazardous materials and resource efficiency.....	31
4.4.1. Pollution prevention and control, and resource efficiency	31
4.4.2. Generation of pollutants.....	31
4.4.3. Prevention of discharge of pollutants	33
4.4.4. Plan and implement an integrated pest management	33
4.4.5. Low-toxicity pesticide for pest control.....	36
4.4.6. Disposal of pesticides in accordance with good international industry practice.	36
4.4.7. Operational risk assessment	1
4.4.8. Environmental health and safety of staff	1
4.4.9. Training action plan.....	1
4.4.10. Conclusion on compliance with OS-4	1
4.5. Operational safeguard 5 : Labour conditions, health and safety.....	1
4.5.1. Human resources policies, procedures and labour relations.....	1
4.5.2. Workforce composition and Employment contracts.....	2

4.5.3. Collective Bargaining Agreement and unions.....	3
4.5.4. Training and development (including for contracted workers).....	3
4.5.5. Equal rights and pay for migrant workers.....	5
4.5.6. Accommodation and working conditions	5
4.5.7. Local employment and community employment	5
4.5.8. Status of in-migration strategy	5
4.5.9. Workers representatives.....	6
4.5.10. Non-discrimination and equal opportunity	6
4.5.11. Addressing harassment	6
4.5.12. Child labor / Forced labour / trafficked persons.	6
4.5.13. Prevention accident, injury or disease in the work place	6
4.5.14. Occupational health and safety.....	7
4.5.15. Grievance and redress	1
4.5.16. Conclusion on compliance with OS-5	1
4.6. Stakeholder engagement	2
5. CONCLUSION AND RECOMMENDATIONS.....	6
6. ANNEX 1: RESULTS BASED LOGICAL FRAMEWORK	1

1. EXECUTIVE SUMMARY¹

This report describes the Environmental and Social management as implemented by Form Ghana. During the Q4 reporting period Form Ghana continued the implementation of the Resettlement action plan and the further implementation of the waste management protocol. During the period again some of the protocols were reviewed and when needed adapted. During the reporting period there were no changes in legislation that has bearing on the company's activities. The ESMP continues to be implemented according to the prescriptions. During the reporting period the main activities in the field concern weeding and thinning and all preparations for the fire season are put in place (sensitisation and field work). For intercropping purposes, two pesticides have been used that are on the FSC list of banned pesticides and classified by WHO as hazardous. These are Emastar and Rainlambda + of which the first can still be applied without derogation but the second cannot. Form Ghana has however decided to completely ban the use of pesticides in intercropping and other activities on FG land in order to avoid .

The people who moved from Akumadan during the first quarter of the year to settle in Kotaa have chosen to return to Akumadan. An in depth investigation into their motivation has been completed. They have received their support packages but decided that although happy with the welcome in Kotaa the land for farming was too far away and they are also happier in Akumadan.

Form Ghana continues to minimize the generation of waste materials. Zoomlion is the contractor who manages Form Ghana's waste and this is going well. Waste separation is taking place at the source.

Many meetings have been held with stakeholders to mutually be informed about what is going on. Work has started on the annual social monitoring activities. No major accidents have taken place. Training has been held on various subjects relating to safe working and a new assessment has been produced on which PPE's are needed for which jobs. Some workers have lodged requests through the Grievance and redress system and these are being treated by management as per the procedure.

Finally Form Ghana welcomed a surveillance visit form AfDB during which much work was done on the improvement of the reporting format.

¹ This summary will be subject to disclosure on AfDB's web site.

1. Introduction

This is the report on social and environmental performance of Form Ghana, the fourth quarter of the year 2019. The report is produced to comply with the requirements on reporting of the African Development Bank (AfDB).

2. Company profile

2.1. Company details

Form Ghana Ltd. is a reforestation company established in 2007 which aims at large-scale reforestation of degraded forest reserves in Ghana, while conserving and restoring natural, riparian forest. Form Ghana is already established in the north of the Ashanti Region, near Akumadan, where the company has reforested the degraded Asubima and Afrensu Brohuma Forest Reserves between 2008 and 2012. Form Ghana has recently set up a Public Private Partnership (PPP) with the Forestry Commission of Ghana for the development of a commercial forest plantation within Tain II Forest Reserve.

Form Ghana wants to execute the project according to the operational safeguards of the AfDB and according to the Principles and Criteria of the Forest Stewardship Council (FSC).

Contact Person:	Mr. W.A. Fourie
	Position: Managing Director
Tel. No.	0544441440
e-mail	W.fourie@formghana.org
Address	P.O Box SYI 211, Sunyani - Ghana

2.2. Environmental permits and certification

Table 1: permits and certificates of Form Ghana

No	Institution	Permit		Permit No / License No / Date of issue /Expiry
		Yes	No	
1	Environmental Protection Agency Tain II	X		CA: 470.2/LG/FO/02 exp. 14-08-2021
2	Water Resources Commission Tain II	X		FGLID 409/18 exp. 31-12-2021
3	Environmental Protection Agency Akumadan	X		CF: 62/LG/FO/02 exp. 14-08-2021
4	Water Resources Commission Akumadan	X		FGLID 421/18 exp. 31-12-2021
3	FSC certificate (Akumadan)	X		CU-FM/COC-811445 / FSC-C044035 : 18-01-2020 (renewal audit to take place in January)
4	VCS certificate Tain and Akumadan	X		VCS project ID 987

2.3.Environmental and social legislation

No changes in legislation have been noted for the reporting period. Internal documentation has been updated to satisfy FSC and AFDB. See for these changes paragraph 4.1.1.

2.4.Work force

2.4.1. Overall work force

Table 2: Work force of Form Ghana

Division	General Workers			Management			Total
	Male	Female	Total	Male	Female	Total	
Sunyani(HQ)	4	2	6	8	1	9	15
Sunyani(HQ) C							
Akumadan P	123	50	173	9	2	11	184
Akumadan C	22	25	47				47
Berekum P	189	44	233	23	7	30	263
Berekum C	248	104	352	0	0	0	352
G.T	586	225	811	40	10	50	861
M/F ratio	68%	26%	94%	8%	1%	6%	100%
Permanent staff (P)							
Casual Staff (C)							

2.4.2. Organization for the environmental and social monitoring

The organisation of the environmental and social work at Form Ghana is spread over several of the company's departments. The company has chosen to implement the work this way because it corresponds better with the organisation as a whole and also helps to avoid the E&S department becoming an independent unit losing connection with the company as often happens. As can be seen in the organogram below the E&S department is spread over three of the company's departments which have a common goal to deliver on E&S.

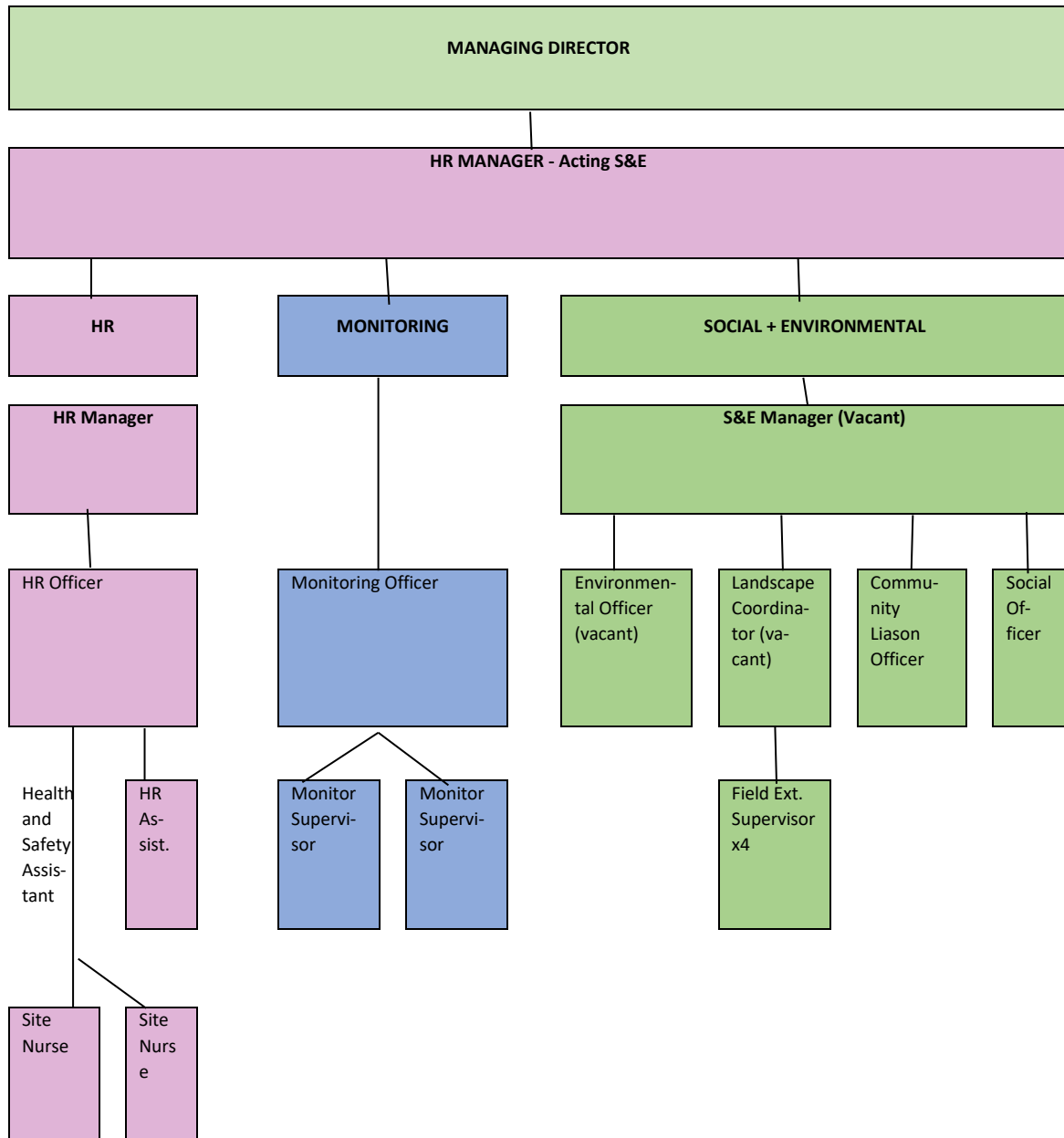


Figure 1: E&S management structure

The E&S work is done by a team of qualified people. As can be seen in the organogram Form Ghana has the intention to further extend the team. It is however not easy to find appropriate people. Especially the E&S manager is a difficult position to fill locally. The intermediate solution is to let the HR manager oversee the work. The E&S manager's primary role is to ensure the submission of E&S reports and the management of the information flows needed for this.

These reports are to be produced for high level partners of the company such as banks, investors and other stakeholders. Also the E&S team is responsible for the management of the implementation of the stakeholder engagement plan, the community development plan and the Grievance and Redress Mechanism. Reports to be produced are typically:

- Form Ghana public annual report
- AfDB quarterly report
- FIP bi-annual report
- FC annual report
- WRC report
- EPA annual report
- Shareholder report
- Monthly news letter

The E&S manager is to ensure that the social officer, community liaison officer, the landscape project coordinator and monitoring supervisors collaborate to make annuals plans for monitoring in order to provide the information needed for the reports. The E&S manager is to ensure that the social officer and the community liaison officer prepare annual work plans. The E&S manager has the responsibility of ensuring overall compliance with national and AfDB requirements and to ensure the quality of the report produced and to observe their timely submission.

Most of the environmental monitoring information (except for waste) is generated by the monitoring officer and his team. Most of the information on a social level and stakeholder engagement are ensured by the social officer and the community liaison officer.

AfDB had indicated that they would like to see a closer follow-up and monitoring of intercroppers. Both in number and farm size as well as their respect of the intercropping agreements.

The team is supported by Form International.

2.5. Description of company activities

The company has two types of land-leases. One type concerns the original land-leases of Asubima Forest Reserve and Afrenso Brohuma Forest Reserve. The other type is a land lease in which the Forestry Commission and Form Ghana also act as partners in a Public Private Partnership.

Akumadan leases and the Public Private Partnership in Tain II

The Akumadan leases and Benefits Sharing Agreements were signed on March 2009 (Asubima) and September 2012 (Afrenso Brohuma). They cover a total land area of 3447 hectares.

The Forestry Commission and Form Ghana signed a 50-year Public-Private Partnership (PPP) Lease Agreement to jointly reforest 14,596 ha of degraded forest land within the Tain II Forest Reserve near Berekum in the Bono Region. Additionally, the Forestry Commission, Form Ghana and the Berekum Traditional Council signed a Benefit Sharing Agreement to formally document the responsibilities and future benefits of each of the three key stakeholders.

Forest plantation establishment and management

Form Ghana intends to plant about 1.500 ha per year. Trees planted on the plantations consist of Teak and a mix of local (indigenous) species. After the forest plantation establishment phase follows the maintenance phase (subdivided in a stage before canopy closure and a stage after canopy closure) and the production phase. After 20 years the Teak trees will be ready for final felling, after which the area will be replanted and a new forest plantation cycle begins.

In order to facilitate the smooth operating of the forest plantation throughout the various phases, some supportive infrastructures has been created. Form Ghana annually establishes a dry land Teak nursery in field in the project area, whereas indigenous seedlings will be transported to Tain II FR from the Akumadan site indigenous nursery. There is a complex with office buildings, residences for expats, a power house (solar and diesel), a training centre, a workshop and a clinic. This complex was constructed off-site on privately owned land, outside of the community of Kotaa in Tain II and Akumadan for the Asubima and Afrenso Brohuma Forest Reserves.

Form Ghana has the following objectives:

- Both Teak and indigenous tree species are planted on the lease areas;
- Degraded riparian zones will be actively restored and conserved;
- The project will be executed in close collaboration with local communities and other stakeholders;
- There will be transparent benefit sharing with relevant stakeholders;
- Job opportunities will be created for local people in several plantation activities;
- Farmers are offered the opportunity for intercropping between the one- and two-year old seedlings.

Biological diversity, water sources and fragile ecosystems found in or near the plantations will be conserved or restored where possible. This includes the riparian buffer zones; 30 meters on each side of the waterway. The carbon storage function of the plantation forests contributes to climate change mitigation.

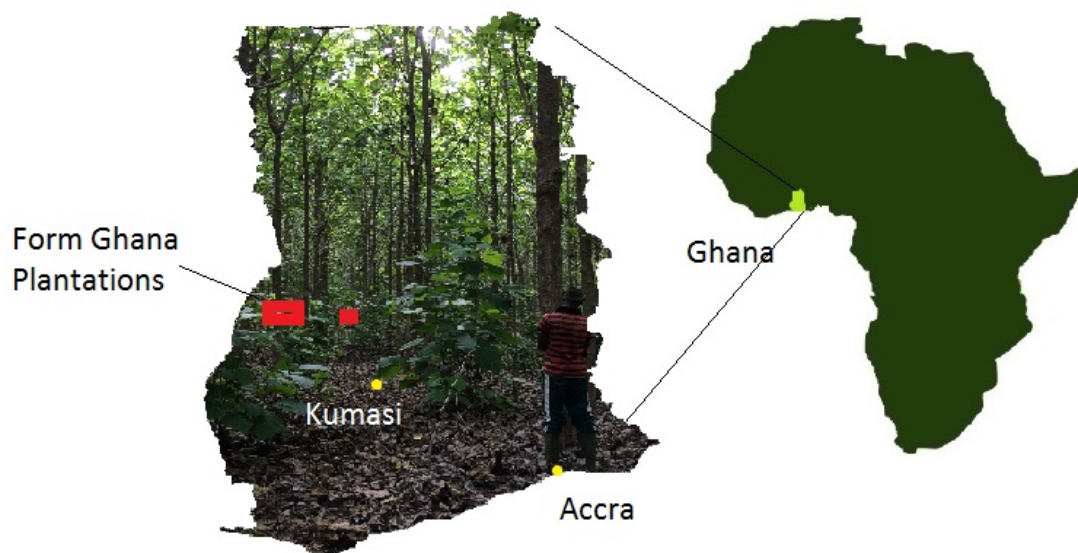


Figure 2: Map of project location in Ghana

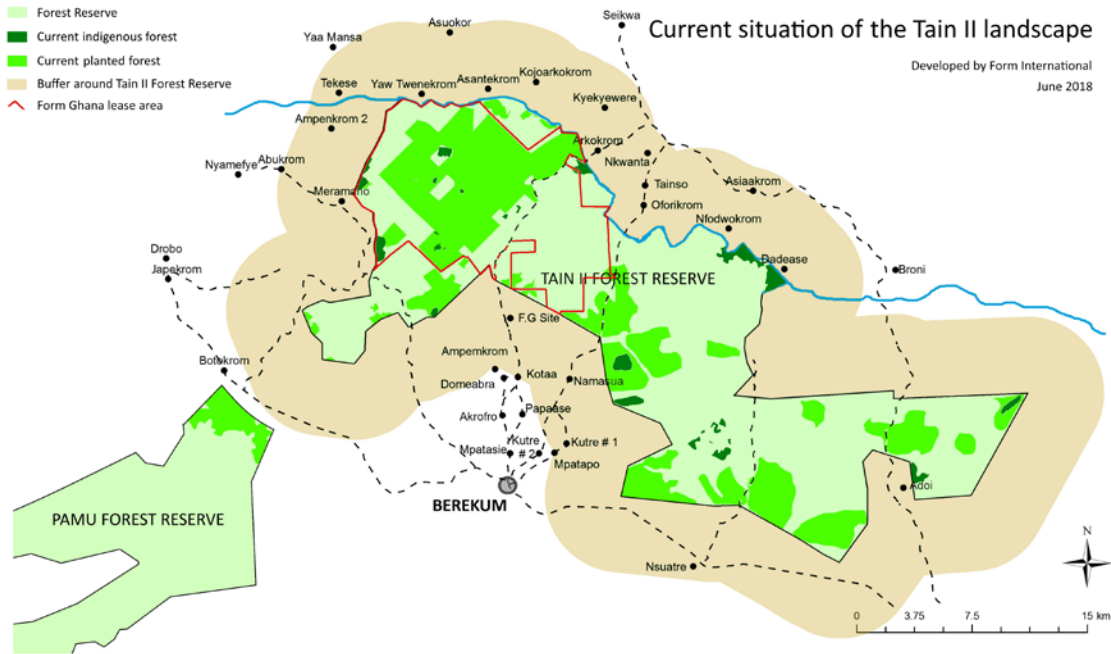


Figure 3: Detailed map of project location in Tain II FR

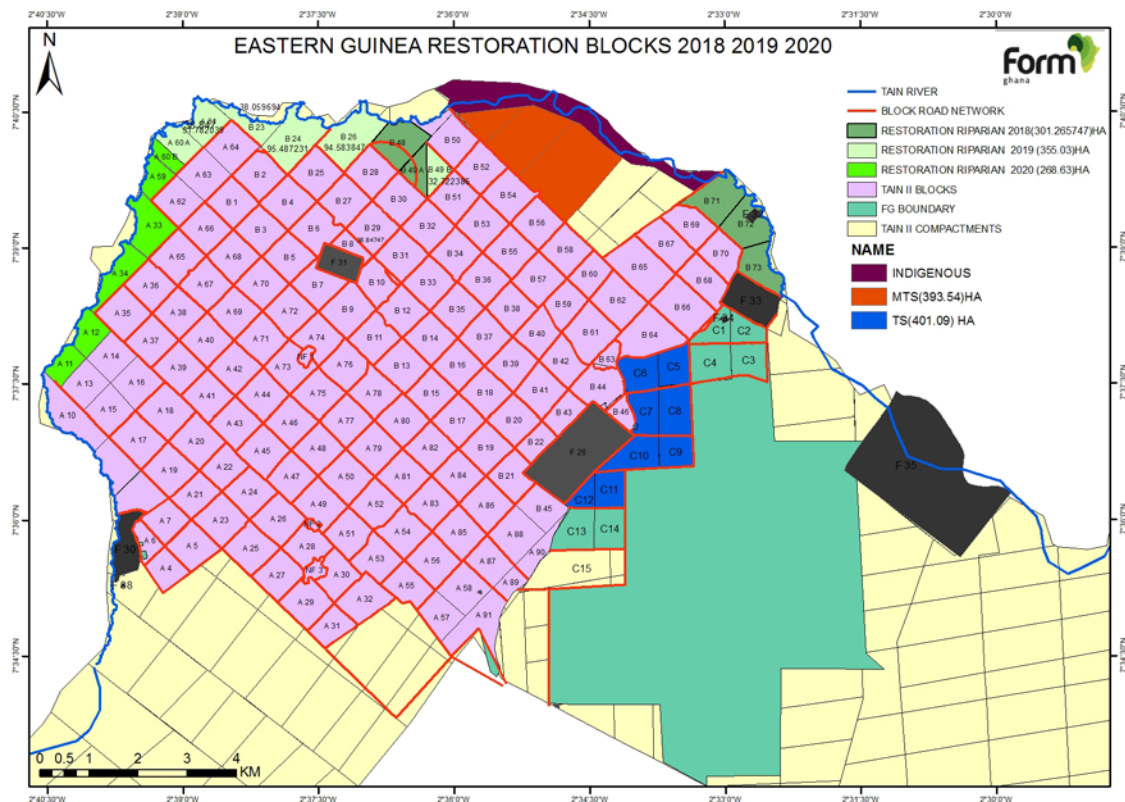


Figure 4: Detailed map of planting blocks in Tain II FR.

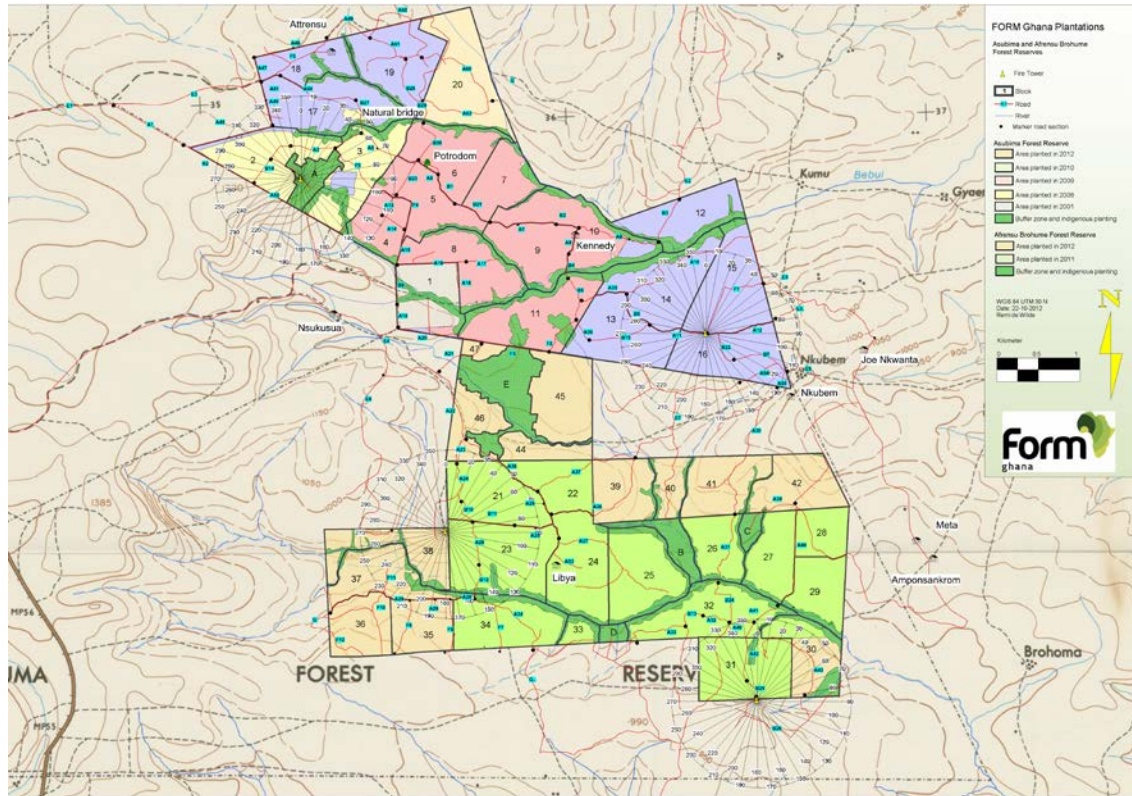


Figure 5: Detailed map of planting blocks in the Akumadan plantations.

2.6. Description of company planting activities during the reporting period

Form Ghana has committed to the achievement of the planting of 11700 hectares in total with the AfDB loan. This year (2019) the total planted area has come to 11478 hectares. Of this 1528 is indigenous. These areas are distributed over the Akumadan plantations and the Tain II reserve.

In 2019 total area of 1283 hectares was planted. This area consists of 878 hectares of Teak and 363 hectares of mixed indigenous. One of the indigenous species is an endemic in Ghana (*Talbotiella gentii*) which was planted by Form Ghana as an ex-situ conservation effort in cooperation with FORIG.

Table 3: Indigenous species planted in 2019

Species' name	Scientific name
Akyei	<i>Blighia sapida</i>
Asanfena	<i>Aningeria robusta</i>
Awiemfosamina	<i>Albizia ferruginea</i>
Baobab	<i>Adansonia digitata</i>
Bush mango	<i>Irvingia gabonensis</i>
Dawadawa	<i>Parkia biglobosa</i>
Ebony	<i>Diospyros mespiliformis.</i>
Emire	<i>Terminalia ivorensis</i>
Kokrodua	<i>Pericopsis elata</i>

Species' name	Scientific name
Mahogany	Khaya anthoteca / grandifoliola
Odum	Milicia excelsa
Ofram	Terminalia superba
Okum	Rodognaphalon buonopozenze
Onyina	Ceiba pentandra
Oprono	Mansonia altissima
Paopao	Azelia africana
Potrodom	Erythrophleum ivorensis
Rosewood	Pterocarpus errinaceus
Shea	Vitellaria paradoxa
Takowa duaa	Talbotiella gentii
Tweneboa	Cordia senegalensis
Watapuo	Cola gigantea
Wawa	Triplochiton scleroxylon

Table 4: Planting progress Form Ghana

RESERVE	LEASE AREA (ha)	YEAR (ha)	TOTAL AREA (ha)	INDIGENOUS (ha)	TEAK (ha)	UNPRO-DUCTIVE (ha)	AREA PER RE-SERVE (ha)
ASUBIMA	1776,5	2001	66.1	11.6	53.8	0.8	1,667.5
		2006	107.5	15,0	91.4	1.0	
		2008	171.5	22.4	148.2	1.0	
		2009	609,0	92.3	512.6	4.2	
		2010	713.4	88.5	612.5	12.4	
AFRENSU BROHUMA	1778,1	2011	986.4	132.8	844.3	9.3	1,779.9
		2012	793.5	127.8	663.1	2.6	
Tain II	14576	2013	637.1	19.06	582.3	35.7	1,4576
		2014	2,098.9	194.7	1,886.9	17.3	
		2015	1,245.3	72.1	1,042.9	130.3	
		2016	125.7	-	92.6	33.1	
		2017	707.8	82.9	559.0	65.9	
		2018	1,941.7	306.5	1,610.2	25.0	
		2019	1,283.4	363.0	878.3	42.0	
Total			11,487.2	1,509.6	9,578.2	380.6	

Other activities taking place in Tain were weeding and clearing, thinning, singling and pruning. In Akumadan the thinning of the 2010 area has started. Other activities are pruning and surveillance.

3. Background of the AfDB's involvement

Form Ghana and the AfDB (the Bank) engaged in a process leading up to the loan to Form Ghana's operations in 2014 and the process was completed by 2016. During this process intensive work was done on the companies Impacts Assessments, Environmental and Social

Management Plans and on a Resettlement Action Plan. The current reporting is the Environmental and Social Reporting as part of the obligations of Form Ghana to the Bank.

4. Reporting on compliance to Operational safeguards

Previously a reporting format as required by Ghana's Environmental Protection Agency was used for reporting on E&S performance to the bank. This format was not much appreciated because it was rather stuffy and did not completely cover the Operational Safeguard. With this new format Form Ghana hopes to cover the required subjects better and also have a report that is easier to read. The current report covers both the Akumadan and the Tain II plantations.

4.1. Operational safeguard 1: Environmental and social assessment

Several Environmental Impact Assessments were prepared for Form Ghana. For each of the Forest Reserves a separate Environmental Impact Assessment was prepared. The following documents were updated in 2015 and posted online;

- Social and Environmental Impact Assessment of the Form Agroforestry Project in Asubima Forest Reserve, Ghana 10-06-2008
- Social and Environmental Impact Assessment of the Form Ghana reforestation of Afrensu Brohuma Forest Reserve, Ghana 15-11-2012
- Social and Environmental Impact Assessment Form Ghana reforestation project in Tain Tributaries Block II Forest Reserve, Ghana 24-2-2015
- Social and Environmental Mitigation Action Plan (RAP) for the whole of Form Ghana, 28-5-2015
- Community Development Plan, Akumadan Plantations, 3-3-2015
- Community Development Plan, Tain II Plantations, 18-2-2015
- Stakeholder Engagement Plan, Akumadan Plantations, 6-5-2015
- Stakeholder Engagement Plan, Tain II Plantations, 17-02-2015
- HCV Analysis Asubima FR, 21-12-2011
- HCV Analysis Afrenso Brohuma FR, 16-05-2013
- HCV analysis Tain II FR, 8-12-2014
- Grievance and Redress Mechanism, 14-9-2016

The Environmental Impact assessments and their linked ESMP's were validated by the EPA.

For this purpose the reports for Asubima and Afrenso Brohuma were taken together in what is known as the Akumadan plantations. The Akumadan documents were first validated with a permit dated 14th of September 2015 and valid until March 13th 2017. A new permit was issued on August 15th 2018 which is valid until August 14th 2021.

The report for the Berekum plantation was first validated with a permit dated February 26th 2016 and valid until August 24th 2017. A new permit was issued on August 15th 2018 which is valid until August 14th 2021.

The Impact Assessments have been integrated into an Environmental and Social Management Plan (ESMP). In the case of Form Ghana this consists of several separate documents which are all linked. It is a whole of background documents, assessments and plans and protocols.

In order to find out if an area is suitable for project development back ground studies such as a soil study, a social study and a flora and fauna study are done. The start-up of the project was done with Reforestation plans which were submitted to the forestry commission and validated in 2007 (Asubima), 2012 (Afrenso Brohuma) and 2013 (Tain II).

Based on the documents various assessments have been done such as the Social and Environmental Impact Assessment and the High Conservation Value Assessment. The information gathered in the studies is used to make forest management plans. The latest version of these plans are a version of October 2018 for Akumadan and 2016 for Tain II.

The information presented in these assessments and the subjects that need to be addressed and monitored are presented in various plans such as the stakeholder engagement plan, the community development plan and the Resettlement Action plan.

In many cases the work instructions that are based on the plans and the assessments are translated into protocols. Form Ghana has 29 protocols:

- P 01 Follow-up of legislation and conventions AB 09112018
- P 02 Prevention of illegal activities - AB 19092016
- P 03 Periodical review of documentation - AB 19092016
- P 04 Waste management - B 29092016
- P 05 Responsible use of chemicals - AB 19092016
- P 06 Stakeholder Engagement Plan - B 05112018
- P 07 Grievance Redress Mechanism - AB 17082018
- P 08 First Aid Procedures & Emergency Evacuation - B 21092016
- P 09 Transport of personnel - AB new 09102018
- P 10 Personal protection - B 28092016
- P 11 Training of personnel -AB 28092016
- P 12 Internal audits - AB 19092016
- P 13 Monitoring - AB 29092016
- P 14 Technical performance in the nursery - B 28092016
- P 15 Technical performance in the plantation - AB 08032018
- P 16 Storage of fuel, lubricants and toxins - B 28092016
- P 17 Management requirement and responsibility AB – 05112018
- P 18 Machine maintenance - AB 19092016
- P 19 FSC Trademark usage - AB 19092016
- P 20 Meeting schedule - AB 28092016
- P 21 Fire prevention and firefighting - B 28092016
- P 22 Chain of custody - AB 09112018
- P 23 First aid for envenomation and rabies - AB 19092016
- P 24 Road construction and maintenance - AB 19092016
- P 25 Harvesting 09112018
- P 26 Propagation of Allanblackia 19092016
- P 27 Information on contagious diseases - AB 19092016
- P 28 Community Development Plan - B 10112016
- P 29 Integrated Pest Management 21092016

Annually a monitoring plan is developed which covers all important subjects that need to be reported upon. The management system is based on the FSC Principles and Criteria. The systematics between the various documents is described in the schedule below.

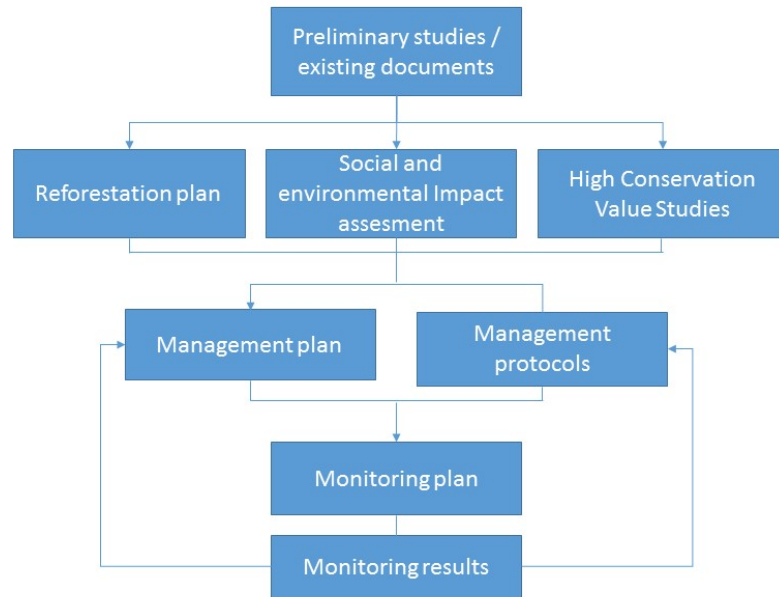


Figure 6. Links between various documents constituting the ESMP

The environmental and social management of Form Ghana addresses the recommendations and mitigation measures proposed in the impact assessments of the Forest Reserves.

4.1.1. Developments on the E&S and ESMP during the last report

During the reporting period internal audits were held on FSC compliance and work was done on updating various protocols in the light of compliance to FSC. During internal audits some of the protocols were found to be outdated. The protocols changed were:

- P01 Follow-up of legislation and conventions
- P02 Prevention of illegal activities
- P03 Periodical review of documentation
- P05 Responsible use of chemicals
- P08A First Aid procedures & Emergency Evacuation – Akumadan
- P08B First Aid procedures & Emergency Evacuation – Berekum
- P10 Personal Protection
- P12 Internal audits
- P15 Technical performance in the plantation
- P16A Storage of fuel, lubricants and toxins – Akumadan
- P18 Machine maintenance
- P19 FSC Trademark usage

- P20 Meeting schedule
- P21B Fire prevention and firefighting – Berekum
- P22 Chain of custody
- P23 First aid for envenomation and rabies
- P24 Road construction and maintenance
- P25 Harvesting
- P27 Information on contagious diseases
- P28 Community Development
- P29 Integrated Pest Management

4.1.2. Third party verification on management in place

Form Ghana carries out internal audits as per protocol 12. The implementation of all protocols is verified in the field and in offices. This internal auditing is supplemented by annual external audits.

Form Ghana's management system in Akumadan is checked annually by an independent auditor according to the principles and criteria of the FSC. Management in Berekum is done along the same P&C. These audits are conducted by Control Union Ghana. In 2019 the audit was accompanied by an independent reviewer named ASI which audits the auditing company. During the 2019 audit three non-conformities were raised. NC 2019-01 concerned the risk assessment in protocol P10 which the auditor judged outdated and in need of an update. NC 2019-02 which requires the company to formalize a policy on casual workers. The observer ASI added another NC concerning the need to update the HCV study for the Akumadan plantations. Form Ghana has to address these Non-Conformities before the next audit in January 2020. The audit report is available via:

<http://fsc.force.com/servlet/servlet.FileDownload?file=00Pf300000wH8UYEA0>

4.1.3. Conclusion on compliance with OS-1

Based on the information presented it can be concluded that Form Ghana is compliant with the national level requirements concerning environmental and social assessment and can also carry away the approval of the independent auditors. It is also clear that for Form Ghana the environmental and social assessments are not static. Based on the assessments dynamic management system has been developed.

4.2. Operational safeguard 2: Involuntary resettlement, land acquisition, population displacement and compensation

In 2015 Form Ghana worked on the elaboration of a Socio-Economic Impact Mitigation Action Plan (SEIMAP) to ensure no project affected people would suffer negative effects of project implementation. As a basis for this plan served a large social study that was conducted and reported upon in the first version of the SEIMAP produced in 2015.

The original approved version of the document consisted of the following chapters providing information:

- Introduction
- Institutional & Legal Framework
- Socio-economic survey and asset inventory
- Eligibility
- Livelihood support packages
- Stakeholder consultation
- Grievance procedures
- Monitoring and evaluation
- Organization and budget

All this information can be looked up in the first officially approved version of the SEIMAP (2015). In order to ensure a simple overview and to the point structure for the update of the SEIMAP all historical descriptions were chosen to be left out in a new version, which was completed in 2019.

4.2.1. Summary of involuntary resettlement and compensation plans

Form Ghana identified the following categories of people that perform (illegal) activities within the area managed by Form Ghana and are therefore affected by the project:

- 1) Farmers: People that farm (partially) within but live outside the project area
- 2) Settlers: People that live and farm within the project area (some are vulnerable)
- 3) Cattle herders: People that herd cattle within but live outside the project area
- 4) Occupants of the resettlement area: People farming on the land in Kotaa earmarked for settlement by people from Akumadan

For these various groups of people, packages were developed to cover the losses these people would incur when the project would go ahead as planned. These packages and the number of people initially involved are presented in the entitlement matrix presented below:

Table 5: Categories of PAP and their packages

Category of PAP	Category of loss	Package	Previous number of people concerned
Farmer households	Crops (Cash & Food)	Intercropping agreement Legal status Job opportunity	420 (5 Akumadan and 415 Tain)

Category of PAP	Category of loss	Package	Previous number of people concerned
Settler households	Crops (Cash & Food)	Water facility near farm Intercropping agreement Legal status Job opportunity Water facility near farm	27 in Akumadan (3 of which were deemed vulnerable)
	Houses (Primary Residences)	Legal housing site in host community Connection to road network Access to host community facilities	
	Cost of moving	Transportation assistance	
Settler households that have moved and declined the any assistance by Form Ghana	No loss	No package	All 27 households had agreed to move to Kotaa.
Cattle herder households	Pasture land	No facilitation; sufficient land for grazing available.	12 herder and households were identified in the first final RAP
	Access to water points for cattle	No facilitation; water points can still be accessed after company establishment.	
Vulnerable households	Crops (Cash & Food)	Intercropping agreement Legal status Job opportunity Water facility near farm	3 households were deemed vulnerable in the original RAP
	Houses (Primary Residences)	Legal housing site in host community Connection to road network Access to host community facilities Assistance with construction of housing in host community	
	Cost of moving	Transportation assistance	
Farmers on resettlement plot	Crops (Cash & Food) Land	Payment for land and for crops	0

Concretely this means that the following packages were agreed:

- 1) **Farmers:** People that farm (partially) within but live outside the project area. These people are guaranteed access to new farm land in Tain II, possible employment by Form Ghana and assistance with access to water nearer to the farm sites.
- 2) **Settlers:** People that live and farm within the project area (some are deemed vulnerable). For these people Form Ghana has negotiated a site in the village of Kotaa to build houses. Form Ghana has made sure that their insertion into the Kotaa community was well guided by the village's chief and elders. Form Ghana has had a house built for temporary accommodation while the people built their own houses. Form Ghana also constructed a borehole and ablution facilities. The people were given traditional title deeds to the land. The people and their possessions were moved toward the end of February 2019.
- 3) **Cattle herders:** People that herd cattle within but live outside the project area. It was decided that the cattle herders do not suffer direct consequences from plantation development and that the most important to them is the continued access to water in the Tain river and access to grazing. Since Form Ghana will develop only part of the land the access to the river and to grazing is not affected by Form Ghana's activities.
- 4) **Occupants of the resettlement area:** People farming on the land in Kotaa earmarked for settlement by people from Akumadan. These people were farming the land reserved for the settlement of the people from Akumadan. As such they needed to be compensated for the land and for the crops on the land. Form Ghana has compensated for both in a monetary way and also supplied cashew seedling for cashew farm establishment.

4.2.2. Update of the current resettlement situation

Since the initial elaboration of the SEIMAP in 2015 some changes have occurred. Due to the passing of time until the first disbursement by the bank and the first start of activities, part of the settlers have moved out of the project areas. On the other hand due to pressure (Operation Cowleg) on cattle herds all over Ghana more herds have moved in to the surroundings of Tain.

The table below describes the number of Project Affected People still available and therefore entitled to support packages. The cut-off date for the registry of original PAP was 2nd of April 2015.

Table 6: Categories of PAP updated

Category of PAP	Category of loss	Package	Previous number of people concerned	Current number of people concerned
Farmer households	Crops (Cash & Food)	Intercropping agreement Legal status Job opportunity Water facility near farm	420 (5 Akumadan and 415 Tain)	410 farmers now have an intercropping agreement in Tain. 0 in Akumadan
Settler households	Crops (Cash & Food)	Intercropping agreement Legal status Job opportunity Water facility near	27 in Akumadan (3 of which were deemed vulnerable)	7 households have received the package None are deemed

Category of PAP	Category of loss	Package	Previous number of people concerned	Current number of people concerned
	Houses (Primary Residences) Cost of moving	farm Legal housing site in host community Connection to road network Access to host community facilities Transportation assistance		vulnerable. 4 families have signed a letter indicating they are not moving FG has actively searched for the 16 missing families (radio and newspaper advertisement)
Settler households that have moved and declined the any assistance by Form Ghana	No loss	No package	All 27 households had agreed to move to Kotaa.	4 households have decided to stay in Akumadan. They had stopped farming in the FG lands and are now engaged in trade or farming other land. They have voluntarily declined the assistance package and waived their entitlement.
Cattle herder households	Pasture land Access to water points for cattle	No facilitation; sufficient land for grazing available. No facilitation; water points can still be accessed after company establishment.	12 herder and households were identified in the first final RAP (cut-off date 2-4-2015)	20 herders and their households have been identified during last meeting (February 2018). This number was confirmed in October 2019.
Vulnerable households	Crops (Cash & Food) Houses (Primary Residences)	Intercropping agreement Legal status Job opportunity Water facility near farm Legal housing site in host community Connection to road network Access to host community facilities Assistance with construction of housing in host	3 households were deemed vulnerable in the original RAP	No more vulnerable households will be part of the move.

Category of PAP	Category of loss	Package	Previous number of people concerned	Current number of people concerned
	Cost of moving	community Transportation assistance		
Farmers on resettlement plot	Crops (Cash & Food) Land	Payment for land and for crops	0	3 farmers and the queen mother

Form Ghana has launched a radio and newspaper campaign in October 2019 to find the people that accepted the package initially but that have disappeared before it could be implemented and they could be assisted with the move to Kotaa. No-one has come forward until the end of the year 2019. The search is now closed.

Table 7: Sources of information presenting the wrap up with various PAP.

Type of PAP	Original number	Current number	Support documentation
Settler households	27	7	Proof of transfer of land title, proof of moving, letters signed
Settler households declining offer		4	Letters signed
Settler household disappeared (including Vulnerable households)		16	Radio broad cast and newspaper article calling out for these people to get into contact with Form Ghana. No response in 2019. Action closed now.
Cattle herder households	12	20	Reports
Farmers on resettlement plot	4	4	Financial compensation

As part of the preparation for a loan agreement Form Ghana had developed a Social and Environmental Impact Mitigation Action Plan, (a RAP as per AfDB requirements).

The resettlement of Akumadan farmers to Kotaa was done in October 2018.

Farmers were all provided with all benefits as promised which were:

- a land piece of 0.2 ha each with land tenure agreement letters,
- housing built by Form Ghana to house them temporarily,
- social facilities of KVIP, Solar borehole were installed to support their stay in Kotaa community
- Assistance with the move to Kotaa
- Land for intercropping.

In addition to this , they were given the opportunity to participate in the land scape project (fertilizer and improved maize seed increasing potential yield from 1 tonne to 3,5 tonnes per

hectare as well as technical assistance) in the plantation (see for number of participating farmers paragraph 4.2.3 which shows that 152 farmers did participate in this program. The Grievance redress mechanism is in place to address any issues that might emanate in their stay in the community.

In view of this the chief of Kotaa and the village elders and the E&S officer selected some members to ensure this mechanism was put in place and implemented as well.

The new settlers moved back to Akumadan in the month of May 2019. A follow up monitoring was done to find out why all moved back on 29th August 2019.

The following information was collected:

Q: Why have you left Kotaa community after the company has given farming opportunities of (a contract in the TS1 farming area of Form Ghana), which other farmers participated fully and happily.

A: We found the farming prescriptions difficult and different from their old ways of farming.

-Form Ghana explained that, the objective of the TS1 project was for every farmer to harvest more yields from small piece of land size and that that was also a good opportunity for them as well.

- The settlers indicated the distance from plantation to house of stay was far and therefore they will rather farm in the Akumadan area which they know.

In early December 2019, the Afdb on their mission team visited the project affected people in Akumadan. The main issues that the paps mentioned as being the reason of their movement back to Akumadan is the far distance of the Tain II plantation to their staying community. Management of Form Ghana still made them aware that they own each a land parcel of 0.2ha as one of Form Ghana’s package to them.

4.2.3. Livelihood restoration / improvement

Form Ghana actively encourages farmers to intercrop in the plantation. During the main season of 2019 this concerned 410 farmers in the Tain II reserve and none in Akumadan (see 4.2.5). Form Ghana has also worked hard with Form International in obtaining funding to do more for the people in the communities surrounding the Form Ghana lease in Tain II. Through a grant provided by DOB ecology in the Netherlands see; <http://www.dobecology.nl/ecology/programmes/landscape-restoration-ghana/> Form Ghana is able to assist the farming communities to improve their success with crops and to improve their environment. The program focuses on fire management, improved cropping systems and environmental restoration in the lands around Tain II. The P4F program has also awarded funding to Form Ghana for activities in the Tain II Forest Reserve. See: <https://partnershipsforforests.com/2017/12/11/mou-signed-restore-tain-ii-forest-reserve-ghana/>

Table 8: Achievements of the landscape project on intercropping.

Land use system	# Farmers	New Ha	Existing Ha	Total Ha
TS1	152	297.2	-	297.2
Admitted farms (new established and Existing cashew farms including maize)	32	62.06	80.95	143.01

Off-reserve (new established and Existing cashew farms including maize)	15	22.75	16.92	41.68
Cashew Scion bank	NA	1.63		1.63
Demo farm	NA	8		8
Trial Plot	NA	7		7
TOTAL	199	398.64	97.87	498.52

The support program is also available to the settler farmers coming from Akumadan.

4.2.4. Distribution of benefit sharing

Form Ghana has started harvesting in the Akumadan plantations (thinnings). 2% of the Benefit sharing is to be distributed to the District Council by the Forestry Commission after it is paid by Form Ghana. The DC is to use this money for the implementation of development activities for the communities.

Form Ghana has no control over the funds after payment to FC. All FG can do is make all partners aware of the funds paid out.

The following benefit sharing amounts have been made available to FC of which a quota should be available to the communities.

- 2018 \$ 2,415.72
- 2019 \$ 14,321.29

4.2.5. Community project development activities

In the Community Development Projects for Tain and Akumadan the following activities are presented:

Table 9: Status of projects presented in the Community Development Plan.

Project T= Tain II, A = Akumadan	Estimated budget	Estimated time line	Status
T: Rehabilitation 30 km public roads Berekum, benefitting 21 communities	79 060 GHC	2013	Complete
T: Maintenance, 30 km public roads Berekum, benefitting 21 communities	50,331.02 GHC	2015	Complete
T: Bore hole, poly tank and pump in Kotaa	6,416.72 GHC	2014	Complete
T: Rehabilitation chief palace Kotaa, temporarily used as office space and handed back to community	25,000 GHC	2013	Complete
T: Maintenance Women's movement building Kotaa	25,000 GHC	2013-2014	Complete
T: Stakeholder engagement	0 *	Every year	Ongoing

Project T= Tain II, A = Akumadan	Estimated budget	Estimated time line	Status
T: Inter-cropping	0 *	Every year	Ongoing
T: Fire fighting	0 *	Every year	Ongoing
T: Generated employment	0 *	Ever year	Ongoing
T: Training to workers	0 *	Every year	Ongoing
T: Road safety awareness	0*	Every year	Ongoing
T: Form Ghana Ladies Club	3000 GHS	Every year	Ongoing
T: Bore hole, poly tank and pump Kotaa (area new settlers)	45,000 GHS	End 2016	Complete
T: Bore holes poly tanks and pumps in Tain plantation for inter-croppers	108,000 GHS	End 2016	Complete
T: Maintenance bore holes, poly tanks and pumps in Tain Reserve	6000 GHS	Every year	Complete for 2019
T: Training of intercroppers and fringe communities on alternative livelihood possibilities	100000 GHS	2018-2020	Complete for 2019
A: Road rehabilitation & maintenance Akumadan	20000 GHS	Every year	Complete for 2019
A: Stakeholder engagement	0 *	Every year	Ongoing
A: Inter-cropping	0 *	Every year	Not relevant van Akumadan any more.
A: Fire fighting	0 *	Every year	Ongoing
A: Generated employment	0 *	Ever year	Ongoing
A: Training to workers *	0 *	Every year	Ongoing
A: Road safety awareness	0 *	Every year	Ongoing
A: Form Ghana Ladies Club	3000 GHS	Every year	Ongoing
A: Ablution facilities at Akumadan	45,000 GHS	End 2015	replaced
A: School rehabilitation for Akumadan DA Faith primary school (new activity not in the original plan (was ablution facilities)	Quote requested	Start 2020	Not started
<i>Amounts marked with * are not budgeted separately as they are either part of company costs or budgeted as a separate activity.</i>			

Form Ghana has completed a good deal of them and has most of the others ongoing. The ablution facilities for Akumadan have been replaced as a project with a new project to rehabilitate a school in Akumadan.

4.2.6. Consultation, sensitization and grievance redress mechanism

The Grievance and redress system has been in place for a number of years now and it works. So far it is most often the Form Ghana work force that makes use of it. From time to time also members of the communities use it. No cases have been put forward during the last quarter.

Form Ghana has regular interaction with stakeholders see chapter 4.6.

4.2.7. Intercropping

Of the intercroppers information is collected concerning their intercropping agreement, the area and location farmed. Below is a table of intercropping registered for Q4 of the year 2019. There were no intercroppers on Form Ghana land in Akumadan.

Table 12: Intercroppers in Tain II

Community	Number registered in 2019 (Q4)	Male farmers	Female farmers
Kotaa	29	0	29
Ampenkrom	17	17	0
Domeabra	3	3	0
Namasua	39	22	17
Oforikrom	7	6	1
Tainso	51	44	7
Arkokrom	133	116	17
Kwadwoarko	44	44	0
Asantekrom	51	47	4
Yawtwenekrom	38	36	2
Meremano	120	112	8
Abuokrom	13	13	0
Jenjemireja	10	9	1
TOTAL	555	469	86

Form Ghana and Form International works with local communities in a DOB Foundation and P4F funded program to make the landscape in and around Tain II more sustainable and productive. This landscape program helps the farmers in the use of modern cropping techniques and improves crop varieties of maize and cashew.

4.2.8. Conclusion on compliance with OS-2

Form Ghana needs to have an ex-post evaluation done by an independent consultant. The TOR for this activity will be elaborated during January 2020 and a request for proposals sent to selected specialists in February. The evaluations should start in March 2020.

4.3. Operational safeguard 3: Biodiversity, renewable resources and ecosystem services

4.3.1. Impacts on biological diversity and ecosystem services

The activities of Form Ghana are to intend to restore the ecological and productive ecosystem services of the Forest Reserve. The productive function is restored through the planting of Teak. The ecological functions through the protection of remaining forest vegetation and the establishment of new indigenous vegetation. The restoration of biological diversity is a long term process. Form Ghana is actively sourcing seed of trees species that should be present in the forest reserve but can't be found anymore such as Kokrodua (*Pericopsis elata*), *Detarium senegalense* and Emeri (*Terminalia ivorensis*) which have been planted already. More missing tree species are in the nursery now and will be planted in 2020. A Fauna and Flora inventory executed end of 2018 indicated that the biodiversity situation is still roughly as it was at the start of work in 2013.

In terms of ecosystem services to communities it can be indicated that the High Conservation Value assessment conducted for Tain II reserve identified no important uses by the communities which can be threatened by plantation development. The planting of indigenous trees may in future present the local population with more fruits and other ecosystem services. These can be made use off as long as the laws concerning Forest Reserves are respected.

Form Ghana has been able to avoid fire damage and even to keep fire out of the plantation completely in 2019-2020 fire season in spite of high fire pressure.

Table 13: Fires reported in and around the plantations

	Berekum		Akumadan	
	Inside plantation	Outside plantation	Inside plantation	Outside plantation
January	0	75	0	131
February	0	10	0	183
March	0	58	0	488
April	0	98	0	120
May	0	109	0	0
June	0	59	0	0
July	0	139	0	0
August	0	254	0	51
September	0	122	0	12
October	0	26	0	8
November	0	34	0	44
December	0	98	0	113
Total	0	1082	0	1150

4.3.2. Carbon sequestration

In 2019 the Form Ghana plantations have sequestered around 115,100 MtCO₂e. This excludes the plantation areas that were not planted by Form Ghana, although it is part of the Form Ghana plantations under active management of Form Ghana. Of the total sequestered volume around 365,638 MtCO₂e were sequestered in the years 2016-2019. It is expected that an additional 2,073,441 MtCO₂e will be sequestered in the years 2020-2035.

In 2019, 346,332 MtCO₂e was verified and issued as carbon credit for sale in the voluntary carbon market. The difference between total sequestration volume and carbon credit volume is because of the following reasons:

- in accordance with the VCS rules a 10% deduction is applied as a non-permanence risk buffer
- areas planted after 2016 were not verified in the carbon verification audits yet
- in the carbon calculations for the carbon verification audits uncertainty deductions are applied
- riparian zones and remnant forest are excluded in the VCS audits.

The graph below shows the trend of carbon sequestration over the period 2008-2030 in the Form Ghana plantations. It also shows the carbon volumes excluding the non-permanence risk buffer, and the volume that was issued as carbon credit.

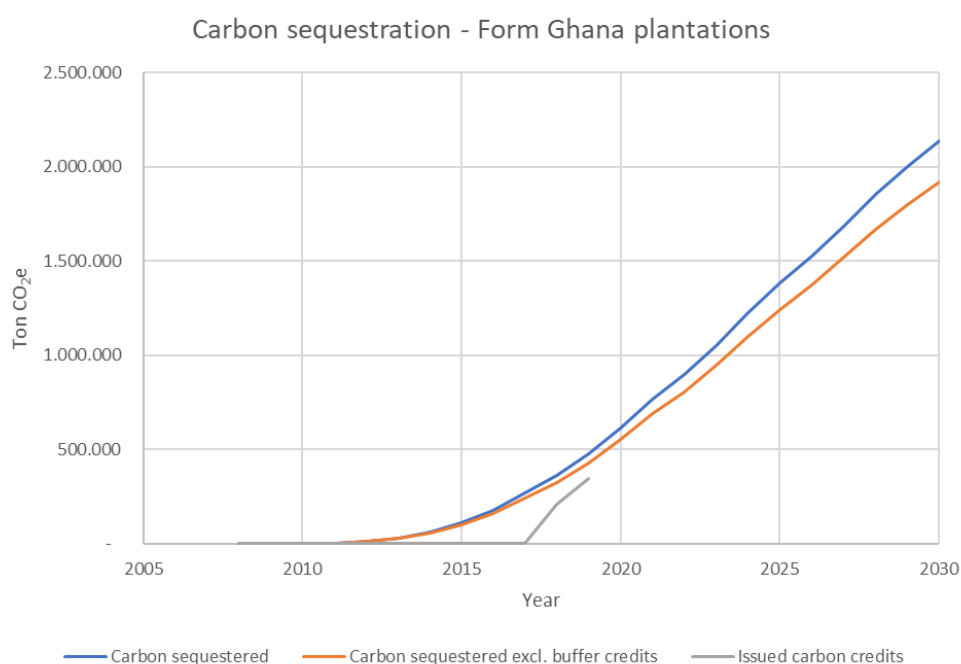


Figure 7: Carbon sequestration in the FG plantations

4.3.3. Conservation of habitats and biodiversity

- Documentation any presence related to any IUCN red-list animal (species, numbers, location, date, etc) (OS3);

Form Ghana has indicated several zones in which the remnants of the original forest are protected as they currently are. The policy is not to interfere with these forests. One of them is

also the only finding location of the shrew *Crocidua grandiceps* in the Form Ghana lease. Another reason to keep it well protected. The shrew is listed as Near Threatened on the IUCN Red List of Threatened Species. This species was specifically studied in 2018 to confirm its continued presence in the Forest Reserve. The species is confined to a piece of remnant natural forest situated between blocks A73 and A74. It was confirmed to continue its presence in this piece of forest. The map below shows the pieces of remnant forest protected in light green and the pieces of riparian forest actively restored in dark green. The orange arrow indicates the only known habitat of the near threatened shrew.

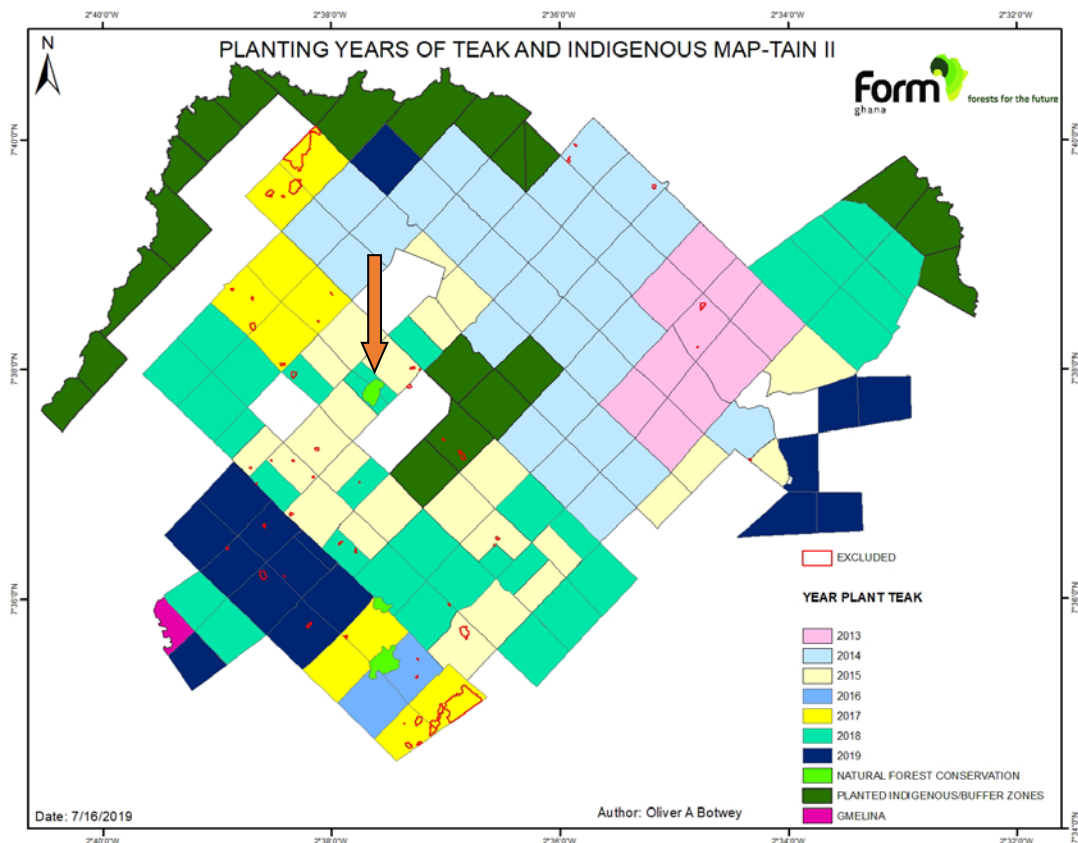


Figure 8: planting progress map indicating the remnant forest housing the shrew.

In Akumadan none of the recorded species were of serious conservation interest on the IUCN Red List of Threatened Species (2017) or CITES schedules. However, the straw-coloured fruit bat (*Eidolon helvum*) is assessed as Near Threatened. Also, members of the Family Accipitridae (birds of prey) and Falconidae (falcons) are of special conservation importance in Ghana and are listed in Schedule 1 of the Ghana Wildlife Conservation Regulations (1995). The African civet, common genet, cusimanse mongoose, bushbuck, Maxwell’s duiker and members of the Family Columbidae (pigeons and doves) are of some conservation importance locally in Ghana and are listed as Schedule II species (Ghana Wildlife Conservation Regulations of 1995). Compared to previous surveys, there seems to be a decline of about 40% in number of mammalian species confirmed in the area. This could be due to the sampling moment (dry season as opposed to wet season in 2011). Most species were recorded in the forest buffers.

- Documenting progress on buffer zone restorations / protection activities (OS3):

Indigenous planting has reached 1,509.6 hectares in total of which 363 hectares were established in 2019. The following species have mainly been used for planting.

Table 14: Indigenous trees planted in Tain II

Species' name	Scientific name
Akyei	Blighia sapida
Asanfena	Aningeria robusta
Awiefosamina	Albizia ferruginea
Baobab	Adansonia digitata
Bush mango	Irvingia gabonensis
Dawadawa	Parkia biglobosa
Bronyadua	Hildegardia barteri
Ebony	Diospyros mespiliformis.
Emire	Terminalia ivorensis
Kokrodua	Pericopsis elata
Mahogany	Khaya anthoteca / grandifoliola
Odum	Milicia excelsa
Ofram	Terminalia superba
Okum	Bombax buonopozenze
Onyina	Ceiba pentandra
Oprono	Mansonia altissima
Paopao	Azelia africana
Potrodom	Erythrophleum ivorensis
Rosewood	Pterocarpus errinaceus
Shea	Vitellaria paradoxa
Takowa duaa	Talbotiella gentii
Tweneboa	Cordia senegalensis
Watapuo	Cola gigantea
Wawa	Triplochiton scleroxylon

- Documenting changes in floral diversity in the buffer zones (OS3)

No new inventory was undertaken in Q4 of 2019.

In Tain, flora representing 21 Families, 49 Genera, and 57 Species were confirmed in the study area during the survey in 2018. The 2018 inventory showed that four of the recorded flora are species of conservation interest on the IUCN Red List of Threatened Species (2018) namely Rosewood, Pterocarpus erinaceus (Endangered; EN), Albizia ferruginea (Vulnerable; VU), Azelia africana (Vulnerable; VU) and Pterygota bequaertii (Vulnerable; VU). Most of these species are frequently planted by Form Ghana except for the Pterygota sp. for which no seed could so far be sourced.

In Akumadan the last monitoring dates from 2015. This monitoring showed that the protection measures are having a positive effect. Results from that study showed that in the buffer zones:

- The forest in the buffer zones of Asubima FR has shown development over the past 5 years to a more mature forest, with larger average height and DBH.
- The buffer zones in Afrensu Brohuma show typical characteristics of a disturbed forest that is now rejuvenating, with a large number of small trees and a small number of large, mature trees.
- A number of species identified in the buffer zones is classified as 'vulnerable' by the IUCN Red List: *Nesogordonia papaverifera*, *Entandrophragma cylindricum*, *Khaya anthotheca*, *Coffea togoensis*, *Hallea ledermannii*.
- The Genetic Heat Index of Asubima FR has increased since 2010, emphasizing the need for conservation of the buffer zones.

In Akumadan a new flora monitoring activity has taken place in Q4 of 2019.

- Documenting changes in bird diversity (OS3)

In Tain II a 2018 survey sixty-two (62) bird species were confirmed in the current 2018 biological survey compared to the sixty (60) in the 2012 survey (Table 10). Out of the 60 species recorded in 2012, only 23 species (38%) were common species in the 2018 biological survey. This is due among others to seasonal changes in bird composition as show by the fact that 40 new species (67% of the 2012 survey) were identified in the 2018 survey.

Generally, the mammal population seem to be faring quite well within then study area and their species dynamics did not change significantly between the 2012 and current 2018 biological surveys.

In Akumadan during the 2017 survey, forty-eight (48) Species, belonging to 41 Genera and 24 Families were recorded on transects (Figure 4; Appendix 3). Fifty-two percent (52%) of the species recorded belong to the Families Accipitridae, Columbidae, Pycnonotidae, Capitonida and Nectariniidae. The Common Bulbul, *Pycnonotus barbatus* (relative abundance of 18.0%), Red-eyed Dove, *Streptopelia semitorquata* (16.5%) and White-throated Bee-eater, *Merops albicollis* (14.7%) were the most recorded and widespread bird species in the Asubima portion of the plantation. The Red-eyed Dove (13.2%) and Common Bulbul (relative abundance of 10.3%) were also most abundant in the Afrenso Brohuma portion of the plantation.

4.3.4. Renewable resources

Indicate the type of renewable resources consumed or reused during the reporting period. The power for the Tain II site was generated by the sites own solar cell system since 2014: 54919 KW have been generated in total so far. In Akumadan the use of power is 5068 kilowatts at the Akumadan site for Q4 of 2019. This power was purchased from VRA. Total solar power generated in Akumadan is 115,625 kilowatts. This is the total since the start of recording. Monthly power generation is about 3000 watts.

4.3.5. Conclusion on compliance with OS-3

Form Ghana's continued efforts on restoration are resulting in increased forest cover and forest productivity. The biodiversity in the plantation is increased with the planting and conservation efforts. Form Ghana is compliant with the requirements of OS 3.

4.4. Operational safeguard 4: Pollution prevention and control, hazardous materials and resource efficiency

Form Ghana has an intensive management system geared toward the control and prevention of pollution. Form Ghana has signed a contract with the Zoomlion company in Ghana to dispose of the waste produced.

4.4.1. Pollution prevention and control, and resource efficiency

The first step in pollution prevention and control is to make sure that as little as possible waste is generated. Reuse is not possible for the waste generated by Form Ghana. Form Ghana has taken several steps to minimize the waste generation:

- GPS followers on vehicles to reduce unnecessary vehicle movements
- Creation of administrative sites close to the forest resource to avoid unnecessary long distances to work.
- Preference for working with manual instead of machine labour to avoid fuel use, reduce chemical use and create employment.
- Buying round-up (glyphosate) in bulk dry form to avoid generation of unnecessary packaging
- Production of teak plants as stumps instead of potted plants to avoid transport costs and plastic bag generation
- Installation of solar generation system on Tain II site to avoid use of diesel generators (also needed for down time of the national grid)

The action all contribute to keeping the resource use and the generation of waste to a minimum.

4.4.2. Generation of pollutants.

The operation of a forestry company does generate a certain quantity of waste and some of it is more dangerous than others. In order to have a good few of the types of waste Form Ghana uses the following classification and means of disposal for waste. The contract with Zoomlion has already resulted in a waste separation system separation plastics from organic waste. Other waste is also kept separate as can be seen in the table below:

Table 15: Waste classification system

Origin	Type	Reduction	Hazard	Disposal	Tracing	Tracing
Classification						
Workshop	Tyres	Less kilometres	Hazardous	Zoomlion	keep waybills	Zoomlion
	Batteries (dry cell)	Use rechargeable batteries.	Hazardous	Zoomlion	keep waybills	Zoomlion
	Batteries (vehicle) (lead-acid)	Less kilometres	Hazardous	Zoomlion	keep waybills	Zoomlion
	Used oil	Less kilo-	Hazardous /	Total filling	keep	Total

		metres	potential for recycling	station	waybills	
	Oil filters	Les kilometres	hazardous / partial potential for recycling	Zoomlion	keep waybills	Zoomlion
	Used cables, wreckage and other metal waste (scrap)	Les kilometres	inert / recyclable	Zoomlion	keep waybills	Zoomlion
Stores, nursery, plantation	Non-hazardous waste (plastics planting bags)	Work with stumps	Non-hazardous / potential for recycling	Zoomlion	keep waybills	Zoomlion
	Hazardous waste (paint, thinner)		Hazardous	Zoomlion	keep waybills	Zoomlion
	Hazardous waste (pesticide package)	Buy in bulk	Hazardous	Zoomlion	keep waybills	Zoomlion
	Waste from harvest operation	Harvesting technique	no danger	Left in field to decompose		
Office buildings	Fluorescent Light Bulbs	Best possible quality.	Hazardous	Zoomlion	keep waybills	Zoomlion
Stores (containers), nursery (bags, trays)	Plastic waste	Reusing containers, trays	Not hazardous / potential for recycling	Zoomlion	keep waybills	Zoomlion

Form Ghana uses fuel for the vehicles, power saws and for emergency operation of diesel generators. For Q4 of year 2019 the use of fuels so far has been is presented in the table below:

Table 16: Fuel consumption in Q4 2019

Fuel Type	Diesel (litres)		Petrol (litres)	
	Akumadan	Berekum	Akumadan	Berekum
Total	6266	12668	1363	1657

The use of fuel produces exhaust fumes which are not further managed, but are not classified as harmful / hazardous. In the table below the further waste generated by Form Ghana is presented:

Table 17: Q4 Waste produced in Q4 2019

Waste produced per category	Quantity produced Tain II	Quantity produced Akumadan
a) solid	<ul style="list-style-type: none"> 17 kg Plastic bags/ plastic bottles 	<ul style="list-style-type: none"> 20 kg of plastic bags
b) liquid	<p>Liquid waste concerns mostly used engine oil</p> <p>Volume produced for Q4 of 2019 is 340 litres</p>	<p>Liquid waste concerns mostly used engine oil</p> <p>Volume produced in 2019 is 1179 litres</p>
Hazardous waste produced	<ul style="list-style-type: none"> 7 car batteries 7 used tires 25 kg of chemical containers 	<ul style="list-style-type: none"> 1 car batteries 0 used tires 9kg chemical containers
Medical waste	<p>10 kg of medical waste</p> <p>There is an agreement with pharmacy, 3 months drugs before expiry are exchanged.</p>	<p>14 kg of medical waste</p> <p>There is an agreement with pharmacy, 3 months drugs before expiry are exchanged.</p>

4.4.3. Prevention of discharge of pollutants

No burning and liquid disposal is taking place. All waste material is disposed of by Zoomlion. Except for the used oil which is disposed of by the supplier of the fuels and lubricants.

4.4.4. Plan and implement an integrated pest management

Form Ghana separates the pest management in two categories; weed control and pest management. Form Ghana does this because weed control involves the uses of specific toxins which will not otherwise appear in the reporting. Weed control is actually not pest management.

Weedicide / pesticide used:

Table 18: Pesticide used in 2019

Type	Quantity / Annum	Final disposal site	Qty of unused or expired product
1 Kalach (Glyphosate) Tain II	7,436kg	Containers removed by Zoomlion	None

	Type	Quantity / Annum	Final disposal site	Qty of unused or expired product
2	Glyphosate (Kalach) Akumadan	130 kg	Zoomlion	None
3	Clethodium (Select EC 120)	300 litres	Containers removed by Zoomlion	None
4	Triclopyr(Triclon)	0 litres		None
5	Ema Star	37 litres	Containers removed by Zoomlion	
6	Bypel	40 kg	Containers removed by Zoomlion	
7	Rainlambda Plus	100 litres	Containers removed by Zoomlion	

Pest management

Form Ghana works according to its protocol 29 on integrated pest management. The best pest management is prevention. Strong, healthy trees are generally more resistant to pests, so prevention of pests is for a large part done through improving tree health and vigour. A number of generic measures is listed below:

- Proper species selection and composition. Species growing under good site conditions are healthier and consequently more resistant to pests. This applies in particular to recently harvested sites with a certain level of disease pressure.
- Weeding of young planting, since a high weed pressure competes with young trees reducing their vigour and pest resistance. Additionally, weeds and other undergrowth may attract pests.
- Activities which damage the trees (e.g. thinning, pruning) are performed in the dry season to prevent infestation with fungi.
- Fertilization might be a viable way to improve tree vigour and pest resistance, whereas the fertilization regime depends on a site's initial soil composition (nutrients and pH).
- Proper thinning improves tree growth, positively affecting vigour and pest resistance of the trees.

If a pest is identified, specific preventive measures will be developed to prevent spreading of that pest, based on collected information. These measures are then incorporated in company management procedures. The very nature of unknown pests makes it impossible to have tailor made solutions ready before the occurrence. This is why Form Ghana has an intensive monitoring and follow-up response system. The occurrence of the pest is monitored in order to determine the severance (level of damage, abundance), the dispersion (location(s)) and the pest population development. Based on monitoring results, and on severity of the pest (level of damage, dispersion, abundance), the company decides upon management action.

It consists of the following steps:

- Identification of a problem
- Identification of the cause (with help of expertise institutions)
- Identification of possible environmentally friendly pest control
- Application
- Success monitoring

Records are kept of the monitoring activities. These records are used to (1) evaluate the efficacy of prevention and control methods; (2) identify areas vulnerable to pests; and (3) monitor pest population development.

Agriculture

This protocol applies to the forestry operation. In the intercropping we were confronted with the Fall Army Worm (*Spodoptera frugiperda*) see <http://www.fao.org/fall-armyworm/en/> which was creating enormous damage in the maize. FG initially applied a biological control method containing **Bacillus thuringiensis + Pieris rapae granulosis** but this proved difficult to apply on short notice and would therefore be ineffective. The team then decided to save the crop with two other pesticides which both occur on the FSC list, and of which one is not allowed while the other for the moment still is. For future use phytosanitary products are banned for the intercropping at Form Ghana. They will not be used again.

Table 19: Pesticide used in to treat against fall army worm 2019

Product	Active Ingredient	Quantity	FSC opinion	
Ema Star	Emamectin benzoate + Acetamipride	37litres	Emamectin benzoate on FSC list no derogation required. Acetamiprin on list but no derogation required for use.	FSC ID:31 CAS No 155569–91–8 FSC ID: 8 CAS No 135410–20–7
Bypel	Bacillus thuringiensis + Pieris rapae granulosis	40 kg	Biological control	
Rainlambda Plus	Lambda-cyhalothrin + Dimethoate	100 litres	Lambda-cyhalothrin on FSC list – <u>not allowed</u> Dimehtoate on FSC list – <u>not allowed</u>	FSC ID: 214 CAS No 91465–08–6 FSC ID:

Product	Active Ingredient	Quantity	FSC opinion
			116 CAS No 60– 51–5

4.4.5. Low-toxicity pesticide for pest control

In addition to preventive measures, it may be necessary to develop ways to further control the pest, or even to eradicate it completely. This depends on the severity of the pest, the rate of dispersion, and the efficacy of the preventive measures.

For all pest control, non-chemical methods are preferred. The use of chemicals (e.g. pesticides, fungicides) is considered only if non-chemical methods are not available or not effective. Equipment used for chemical application is well-maintained and regularly calibrated to minimize excessive application and waste of chemicals. No chemicals are used that are classified as ‘hazardous’ by WHO and FSC, unless no other option is feasible. In that case, Form Ghana will apply for a derogation.

So far the only problem identified in the teak is a fungal problem which is monitored, but not treated. It is known to so far not affect more than 1% of the trees in a discreet area and therefor classified as needing no action other than monitoring.

4.4.6. Disposal of pesticides in accordance with good international industry practice.

Form Ghana will only use pesticides allowed by FSC and AfDB. Form Ghana will only acquire the quantity needed. If quantities are left over they will be supplied back to the supplier or to Zoomlion for disposal. This has so far not been necessary.

4.4.7. Operational risk assessment

Form Ghana has performed an operational risk assessment covering all operations including pesticide use. This is also covered in protocol P10 on personal protection equipment.

Table 20: Risk assessment for chemicals

Activity / site	Risks	Preventive measures	ILO prescribed PPE ²	Deviations (if any)
Chemical weeding	People that work with chemicals may get the chemicals on their skin or on their own clothes.	Cotton overall buttoned to the neck and wrist for all applicators of weedicides and pesticides except Mankar operators. Mankar operators must wear long sleeves, long pants, socks, boots and gloves (optional: goggles and nose mask).	To comply with those specified for the particular substance and application technique	
	People that work with chemicals may inhale the toxic agents.	Face mask for all applicators of chemicals, except Mankar operators.		

² ILO code of practice Safety and health in forestry work (1998) Table 1 Personal protective equipment (PPE) appropriate for forestry operations

Activity / site	Risks	Preventive measures	ILO prescribed PPE ²	Deviations (if any)
	People mixing the chemicals may get the chemicals on their hands.	People mixing chemicals must wear impermeable gloves, in addition to PPE for chemical operators.		

4.4.8. Environmental health and safety of staff

Form Ghana has a great focus on health and safety. A good portion of the workers is annually trained to apply first aid techniques and vehicles are on standby in the plantation for emergency evacuation. For such circumstances there is a specific protocol P 08 First Aid Procedures & Emergency Evacuation - B 21092016. Each team in the field has a first aid kit and a trained first aider. All vehicles have first aid kits.

The spraying team are under close medical observation. Workers are insured through the National Health Insurance Scheme of Ghana.

Form Ghana has sufficient ablution facilities on site to maintain hygienic circumstances.

4.4.9. Training action plan.

Training need is established based on a list of training that needs to be recycled annually and completed with training needs identified based on results from monitoring (see also 4.5.4).

Several trainings are needed to maintain health and safety at work. Trainings must therefore be regularly refreshed. The following health and safety trainings are given to the designated employees: First Aid, Snake bite, Malaria, Personal Hygiene, Diarrhoea, Fire prevention, Safe use of the chainsaw and brush cutter, Safe use and storage of chemicals, Waste management.

4.4.10. Conclusion on compliance with OS-4

The use of two pesticides in combating fall army worm in the intercropper maize causes the OS4 not to be fully observed. For the future the use of pesticides on intercropping is banned completely. When pesticides are to be used in the framework of IPOM on the tree crops substances must be used that are not hazardous to the health of the ecosystem and the operators as listed by WHO.

4.5. Operational safeguard 5 : Labour conditions, health and safety

4.5.1. Human resources policies, procedures and labour relations.

The Form Ghana HR department has developed a number of policies and procedures in addition to the protocols which are part of the ESMP. These are:

- **Absenteeism Management Policy** which serves as a guidance to implement rules and regulation governing the company to maximize employee attendance at work.
- **FG Visitor's Emergency form** (linked to Protocol 27) which informs visitors of necessary medical precautions and collects emergency information.
- **HEALTHCARE POLICY 1 update** sets out principles and procedures so as to create and promote best service of healthcare to all employees.

- **HIV Aids Policy** is to ensure a consistent and equitable approach to the prevention of HIV Aids among employees and their families, and to the management of the consequences of HIV Aids, including the care and support of employees living with HIV Aids.
- **Industrial Attachment Policy** is a training program designed to enable students/graduates placed with the company to acquire practical technical skills and knowledge through on-the-job training under the mentorship of company supervisors with vast experiences in forest rehabilitation for development.
- **Internal Rules and Regulations FMGH** presents the general rules relating to Employment, Discipline, Sanctions, Provisions as to the rights and defence of the workers
- **LEAVE POLICY** indicates the organisation which is to allow flexibility for employees to meet personal, family, work and community commitments without compromising the achievements of business objectives.
- **LETTERHEAD USE POLICY** describes officially the rules and regulations governing the use of company's letterhead, logo and stamp.
- **RECRUITMENT POLICY AND PROCEDURES** aims at enabling the company find and recruit people with the necessary qualifications, skills, and expertise to deliver on its strategic objectives and goals.
- **SHORT TERM- Workers** policy seeks to reach and promote decent work irrespective of employment arrangement, Form Ghana has formulated principles and procedures. These principles and procedures, in conjunction with Form Ghana's internal rules and regulations, grievance protocol and disciplinary action policy, will ensure good labour standards and protection of workers employed by Form Ghana.
- **TRAINING AND DEVT POLICY** is to notify Form Ghana employees of the ways and means of training and developing workers that have the skills needed or career path.
- **Company Procedure Appendix 2019** informs on phone numbers and allowances
- **Procedure Manual Update 2019** describes part of the company's procedures.
- **Section 3 – Finance** explains financial rules
- **Section 4 – Accommodation & Car Policy** describes some of the benefits of FG workers
- **Section 5- Communication** lays out the rules for communication efforts by the company
- **Section 6 - IT Policy** regulates the use of the company's IT equipment and services
- **Section 7- Human Resource Management** describes the HR management of Form Ghana
- **Section 8 - Gender Policy** formulates principles and procedures that address the need for gender equality, rights, responsibilities and opportunities for all employees of the company.

Form Ghana is still to establish a policy on the screening of workers starting or ending employment.

4.5.2. Workforce composition and Employment contracts

Table 21: FG workforce in Q4 of 2019

Division	General Workers			Management			Total
	Male	Female	Total	Male	Female	Total	
Sunyani(HQ)	4	2	6	8	1	9	15
Sunyani(HQ) C							
Akumadan P	123	50	173	9	2	11	184
Akumadan C	22	25	47				47

Berekum P	189	44	233	23	7	30	263
Berekum C	248	104	352	0	0	0	352
G.T	586	225	811	40	10	50	861
M/F ratio	68%	26%	94%	8%	1%	6%	100%
Permanent staff (P)							
Casual Staff (C)							

The content of employment contracts is spelled out in the recruitment policy

4.5.3. Collective Bargaining Agreement and unions

The newest Collective Bargaining Agreement entered into force on the 1st of January 2019 between Form Ghana Limited (FGL), registered by the Registrar General Department under the company Code 1963 and the Timber and Workers' Union of Ghana Trades Union Congress (TWU/GTUC) registered under PART XI OF THE NEW LABOUR ACT (ACT 2003) being parties to the Agreement and pursuit of the new interest of the timber trade and industry, the parties do hereby agree to do all in their power to promote stability of employment and ensure increased productivity in the timber trade and industry to the mutual benefit of both the Employer and the Employees who are members of the Union.

4.5.4. Training and development (including for contracted workers)

Form Ghana has a matrix of training register that indicates when workers are to be trained. There is also provision for both local/ international experts to train the staff permanent/casuals. We also have policies that allow workers to be able to further their studies and their personal development. Training during Q4 is provided in the table below:

Table 22: FG training provided in Tain II in Q4 2019.

DATE	TOPICS	PARTICIPANTS
1-10-19	Grievance Redress Mechanism(Protocol 7)	15 permanent
1-10-19	First Aid Procedures and Emergency Evacuation (Protocol 8)	17 casuals
1-10-19	First Aid for Envenomation and Rabies (protocol 23)	19 casuals
3-10-19	Transport of personnel(protocol 9)	22 Permanent
3-10-19	Training of personnel (protocol 11)	22 permanent
3-10-19	Management requirement and responsibilities of Senior staff(protocol 17)	22 permanent
4-10-19	Technical performance in the plantation	13 permanent

	(protocol 15)	
8-10-19	Storage of fuel, lubricants and toxins(protocol 16)	5 permanent
9-10-19	Fire prevention and fire fighting (protocol 21)	11 permanent
14-10-19	Waste management (protocol 4)	61 permanent
14-10-19	Grievance Redress Mechanism(protocol 7)	61 permanent
14-10-19	Responsible use of chemical(protocol 7)	61 permanent
18-10-19	First Aid training	19 permanent
24-26/10/19	Value chain management	25 permanent
28-30/10/19	Conservation and buffer zone management	7 permanent
31-10-19	HIV/AIDS Refresher training	182 permanent
14-11-19	Education on meningitis	294 permanent
25-30/11-19	Stakeholder engagement training	14 permanent
25-26/11-19	Forest fire fighting	33 permanent
27-28/11-19	Forest fire fighting	65 permanent
2-6/12-19	Stakeholders engagement training	11 permanent
18-12-19	Fire training	31 permanent, 9 casuals
19-12-19	Fire training (domestic fires)	15 permanent, 3 casuals

Table 23: FG training provided in Akumadan in Q4 2019.

DATE	TOPIC	PARTICIPANTS
2-10-19	Waste management(protocol 4)	9 permanent
2-10-19	Responsible use of chemicals(protocol 5)	9 permanent
2-10-19	Harvesting (protocol 25)	9 permanent
2-10-19	Prevention of illegal activities(protocol 2)	9 permanent
8-10-19	Grievances Redress Mechanism (protocol 16)	9 permanent

DATE	TOPIC	PARTICIPANTS
8-10-19	First aid procedures and Emergency evacuation(protocol 8)	9 permanent
8-10-19	Storage of fuel, lubricants and toxins(protocol 16)	9 permanent
8-10-19	First aid for envenomation and rabies protocol 23	9 permanent
8-10-19	Information on contagious diseases(protocol 27)	9 permanent
21-23/10-19	Value chain management	11 permanent
4-11-19	Chemical weeding	13 permanent
8-11-19	Toyota Ghana fleet user training for drivers, rider and mechanics.	19 permanent
21-11-19	Healthcare policy implementation	10 permanent
25-11-19	Fire fighting	20 permanent
26-27/11-19	Fire fighting	56 permanent
28-29/11-19	Fire fighting	188 permanent
18 -12-19	Domestic fire	23 permanent

4.5.5. Equal rights and pay for migrant workers

Currently Form Ghana does not have migrant workers, however, equal rights, however, all workers are treated with equity a per the labour laws and FG internal HR policy.

4.5.6. Accommodation and working conditions

Form Ghana provides accommodation for its senior management staff, all other management members are given monthly rent allowance which is added to the monthly salary. General workers rent their own accommodation. Other working conditions like health insurance, management workers use a private health insurance whiles general workers use the national health insurance together with health arrangement that has been made with the Holy Family Hospital in Berekum as well as hospitals in Akumadan and Techiman.

4.5.7. Local employment and community employment

About 99% of Form Ghana workers are locals with only 3 workers being expats. Also, general workers are recruited from within the local communities where we work. For recruitment of key workers, advertisement are placed through Daily Graphic publications, online recruitment agency and also notices are sent to various stakeholder institutions for qualified persons to apply with priority given to qualified candidates who live within our fringe communities.

4.5.8. Status of in-migration strategy

About 99% of Form Ghana workers are locals with only 3 workers being expats.

4.5.9. Workers representatives

Workers are represented by the union. This is formed by the workers themselves and they select their own executives.

Table 24: Union membership in Q4 of 2019

No. of Males	No. of Females	Total No. of workers
286	77	363

4.5.10. Non-discrimination and equal opportunity.

There is no discrimination to workers. Equal opportunities are given to both male / female workers, able/disable workers according to their capacity and competences. This is strictly according to the labour act.

4.5.11. Addressing harassment

As per the labour act, Form Ghana uses the current HR policy together with the labor act to address any harassment issue that may arise. The Form Ghana HR Policy states as follows;

Form Ghana Limited provides employees with equal employment opportunity to all qualified persons without discrimination on the basis of age, sex, race, disability, marital status or religion in accordance with applicable local, state and national laws and regulations.

Employees have the right to work in an environment free from any form of harassment or direct or indirect discrimination on one or more grounds, including race, gender, sex, pregnancy, marital status, family responsibility, ethnic or social origin, sexual orientation, age, disability, religion, HIV status, conscience, belief, political opinion, culture, language and birth. Employees are encouraged to report immediately any form of discrimination or harassment, whether real or alleged.

4.5.12. Child labor / Forced labour / trafficked persons.

No person under 18 of years is allowed to work at Form Ghana. No forced labour is used (also no work with prisoners). No trafficked persons are employed by Form Ghana.

4.5.13. Prevention accident, injury or disease in the work place

Form Ghana places great emphasis on injury and accident prevention. To this end workers are trained and provided with personal protection equipment. Cases that do arise will visit the company nurse for help or further referral.

Table 25: Q 4 medical cases in 2020 in Tain II

Year	Q4 2019
Workers	263
Medical Attention	530
Hospital Intervention	29
<p>During Q4 of 2019 medical attention was issued 530 times. The most frequent ailment was headache (134 times).The second most frequent ailment was musculoskeletal that occurred (133 times). URTI occurred and stomach pain occurred (70 and 48 times) respectively. During Q4, of 2019, 29 cases were referred to hospital for more detailed diagnosis or further treatment. There were no accidents.</p>	

Table 26: Q4 medical cases in 2019 in Akumadan

Year	Q4 2019
Workers	231
Medical attention	254
Hospital intervention	40
<p>During Q4, of 2019 medical attention was issued 254 times. The most frequent ailment was URTI (60 times). The two second most frequent ailment was musculoskeletal (30 times), body pain (24 times) and headache occurred (18 times). During this (Q4) 40 cases were referred to hospital for more detailed diagnosis or further treatment.</p>	

4.5.14. Occupational health and safety.

Form Ghana places great emphasis on injury and accident prevention. To this end workers are trained and provided with personal protection equipment. Cases that do arise will visit the company nurse for help or further referral.

4.5.15. Grievance and redress

The table below shows grievance cases resolved in the third quarter (highlighted in red colour) and grievance case in the fourth quarter in black colour.

Table 27: Grievance and redress cases in Tain II

Case number	Date filed	Relation to FG (e.g. Worker, stakeholder, etc.)	Topic	Level	Reaction FG complainant	Date reaction	outcome / proposed solution	Status (ongoing / resolved)
BER 2019 – 001	29-03-2019	Worker	A driver pleaded with management to ask the grader operator to make available a turning point at least after every 200 meters drive as there is no turning point in case of emergency except the driver drives 800 meters or to the end of the block	2	Sent to Management for response		It will not be possible to make a turning point every 200m, but we will look at possibilities by end of July 2020	Will be resolved completely by July 2020
			Chainsaw operators asked for feedback on their request for two (2) safety boots each year	2	Forest Manager, HR Manager and HR Officer discussed and proposed a solution		Operators would be given 2 safety boots each year and 1 wellington boot every other year	Resolved
			Workers pleaded with management to start deducting their loans a month after their loan is given to them. They said sometimes the loan is given to them on the 19th day of a month and when they go for their salaries, the loan has been deducted from their salaries that same month.	2	Sent to Management for response		Memo has been sent to the administrative accountant not to deduct loan on the same month of it being received.	Resolved
			Drivers plead with management to give them money for feeding when they are to travel early in the morning without going to site. They also plead that they are given extra money for emergency situations. They suggest that a fixed amount be allocated for every place to cater for breakfast/lunch and emergencies	2	Sent to Management for response		Management will meet drivers in January 2020 to finalise their request	Partly resolved

Case number	Date filed	Relation to FG (e.g. Worker, stakeholder, etc.)	Topic	Level	Reaction FG complainant	->	Date reaction	outcome / pro- posed solution	Status (ongoing / re- solved)
			A driver said drivers in the company are law abiding but for the past two years they have not been given employers excellence award and asked if management is not pleased with their work.	2	Sent to Management for response			Excellence award is given in recognition of outstanding performing employee in the company.	Resolved
BER 2019 - 002		Worker(contract)	He requested for a salary raise as his salary was not increased in 2019	2	Was sent to Forest Manager		05-04-2019	Comparing the rate of other acting Team Leaders who are permanent workers and have acted for 3 years, his rate was higher than them in 2018. Management has decided to maintain his daily wage	Resolved
BER 2019 - 003		Worker	He requested for an permanent worker to assist him in performing his duties.	2	Was sent to Forest Manager		13-04-2019	Forest Manager and HR Officer discussed it. Appiah would have Kuntole Eric to assist him and when the work load increases, Kyere Fredrick would also assist (if Fredrick's work load is minimal). Saani his supervisor is aware of this arrangement and would ensure this is done when needed.	Resolved

Case number	Date filed	Relation to FG (e.g. Worker, stakeholder, etc.)	Topic	Level	Reaction FG complainant	->	Date reaction	outcome / pro- posed solution	Status (ongoing / re- solved)
BER 2019 – 004	11-04-2019	Worker	The spraying workers request for an increase in their daily wage. They want it to be raised to GHS 20.00 per day.	2	Immediate response was given but they said they were not satisfied so it was sent to HR Manager and MD.		17-04-2019	Salaries would not be increased again this year. Salaries were negotiated with union.	Resolved
BER 2019 – 001	20-12-2019	Worker	A worker pleaded for increment of staff loan amount and also extend the loan repayment period.	2	There are conditions attached to the loan by Form Ghana investors including the maximum amount of money that can be given out as loan and its payment duration. Company cannot go contrary to its conditions		20-12-2019	Resolved	Resolved

Case number	Date filed	Relation to FG (e.g. Worker, stakeholder, etc.)	Topic	Level	Reaction FG -> complainant	Date reaction	outcome / proposed solution	Status (ongoing / resolved)
BER 2019 – 002	20-12-2019	Worker	A casual worker who is part of a fire team asked for the end of year bonus.	2	Bonus is given per management as stated in the CBA.	20-12-2019	Resolved	Resolved
BER 2019 – 003	20-12-2019	Worker	A worker requested that all workers should undergo medical screening as there could be some hidden illness.	2	Forest Manager responded that medical screening is a legal requirement and is to be done for all workers. He added that the spraying team underwent the extensive screening because of their exposure to chemicals and similar screenings could be based on the level of exposure to hazards.	20-12-2019	Resolved	Resolved

Table 11: Grievance and redress cases in Akumadan

Case number	Date filed	Relation to FG (e.g. Worker, stakeholder, etc.)	Topic	Level	Reaction FG -> complainant	Date reaction	outcome / proposed solution	Status (ongoing / resolved)
AKU 2019 - 001	3-6-2019 Union meeting, point 1	Worker	Workers are pleading to management to kindly review May Day feeding fees as it has not been reviewed since 2012 to date. Workers propose review from GHC 15.00 to GHC 20.00 per worker	3	To be sent for response (June Union Monthly meeting)	28-06-2019	Management can not review this for now.	Resolved

Case number	Date filed	Relation to FG (e.g. Worker, stakeholder, etc.)	Topic	Le vel	Reaction FG -> complainant	Date reaction	outcome / proposed solution	Status (ongoing / resolved)
AKU 2019 - 002	02-08-2019	Worker	Workers who do not have children below 18 years registered as their dependents in the company are appealing to management to consider their grandchildren as their dependents	3	To be sent for response (HR Office)	05-08-2019	Management enforces what is in the workers procedures.	Resolved
AKU 2019 - 003	28-08-2019	RRT Workers	RRT members complaint that their team leaders do refuse to take innovative ideas from them, anytime suggestions are being made.	2	Date was scheduled for the complain to be resolved.	28-08-2019	The plantation manager responded that fire suppress and management training will be conducted for both RRT team leaders and members. He added that he will meet all of them and address that.	Resolved
AKU 2019 - 004	28-8-2019	Worker	The log scalers complaint that no additional salary was given to them when they were moved from plantation workers to their new position (log scaler position)	2	Site HR Personnel Responded	28-08-2019	The Site HR and Plantation managers explained that the log scalers salary was not reviewed because, their salary was already above the minimum salary for the new position per Form Ghana Job Grading and salary structure.	Resolved
AKU 2019 -005	28-08-2019	Worker	Opoku Kwame (Chainsaw mechanic at Akumadan) is appealing to management that he needs a worker to train him as his assistant so that anytime he goes on leave or sick, such person would continue to repair chainsaw machines	3	Forest Manager Responded	04-09-2019	Forest Manager asked Plantation manager and HR personnel to look for multi skilled chainsaw operator and implement this.	Resolved

Case number	Date filed	Relation to FG (e.g. Worker, stakeholder, etc.)	Topic	Level	Reaction FG -> complainant	Date reaction	outcome / proposed solution	Status (ongoing / resolved)
AKU 2019- 006	28-08-2019	Worker	Workers plea if management could add one pharmacy (Fodjour pharmacy in Techiman where they buy the company drugs) to that of Akumadan in the company healthcare policy like the case of Berekum and HQ (Sunyani) .	3	Forest Manager to discuss with HR Manager	28-08-2019	This is implemented and Mr. Sark pharmacy has been added.	Resolved
AKU 2019- 007	28-08-2019	Worker	A worker appealed to management to kindly support her financially to care for her sick daughter (mental illness). She also appealed to management to support her dependants financially to pay his school fees.	2	Site HR and Plantation Manager Responded	28-08-2019	HR and plantation manager explained that per the company's CBA, the company do not support workers dependants financially to pay their schools fees. Neither do the company support workers dependants with cash to pay hospital bills	Resolved
AKU 2019- 001	2-10-2019	Fire team leaders	Acting Team leaders who also work as RRT leaders are appealing to management to move them from Job grade A2 to the appropriate team leader's job grade	3	Sent for response	04-10-2019	The Grading team will meet in January ending and attend to this.	Will be resolved in January ending
AKU 2019 -002	2-10-2019	Monitoring team	Monitoring workers request for review of their responsibilities and possibly move from job grade A2 to A3 . Additional responsibilities to the monitoring workers workers include : 1. R& D data collection .	3	Sent for response		Roles stated are part of monitoring job roles for the normal 8 working hours.	Resolved

4.5.16. Conclusion on compliance with OS-5
Form Ghana is compliant with OS 5.

4.6. Stakeholder engagement

Stakeholder engagement is a continuous process for Form Ghana. The following types of stakeholder engagement were planned and executed.

Table 28: Stakeholder engagement activities in 2020

SEP activity planned	Activity realised	Plan for rest of the year
6.1 In depth sharing: provision of reports and meetings with individuals	Report to FC (01-2020) Report to EPA (01-2020) Report to AfDB (01-2020) Report to FIP (01-2020) Report to AfDB (04-2020) Report to AfDB (07-2020) Report to FIP (07-2020)	Quarterly reports to AfDB
6.2 Active engagement: community representatives	Several meetings were held (see chapter 6 for details)	Meetings will continue
6.3 Active engagement: central stakeholder meetings	Two meeting in 2019	Hold stakeholder meetings
6.3 Active engagement: inter-cropper meetings	Meetings were held (see chapter 6 for details)	Meetings planned in preparation of the fire season
6.4 Active engagement: school visits	Schools were engaged in community fire education and management	Visit the largest schools surrounding the plantation, (ie Akumadan senior high and Wiafe Akenten senior schools).
6.5 Information sharing: company website and newsletters	Company website is up to date / newsletter was last sent October (Newsletter #8)	Keep website updated / continue publishing newsletters
6.6 Grievance and redress mechanism	Grievance and redress system is functional and reported upon in this report	Keep system functioning and report quarterly
6.7 Capacity building	Capacity building was pro-	The landscape activities

company	vided to farmers in the TS1 and Admitted farm project areas for maize and cashew planting.	foreseen further capacity building in September for the Field extension Supervisors on several relevant subjects.
----------------	--	---

Form Ghana has regular interaction with stakeholders.

Table 29: social meetings held in Q4 in 2019 in Tain II

Date	Location	Type of meeting	# of people present	Topics (Agenda) discussed
8-10-19	Fringe community	Community durbar	150	Integrated community fire management
15-18/10-19	Berekum	Consultancy meeting	6	Community fire management – self-sustaining entity workshop.
22-10-19	Fringe community	Community durbar	200	Integrated community fire management.
9-12-19	Fringe community	Community meeting	23	Community fire management – self-sustaining entity workshop. Introducing community liaison officer
12-12-19	Fringe community	Community meeting	42	Community fire management education. Introduction of community liaison officer.
13-12-19	Berekum	Stakeholders meeting	27	To update of current happenings and take on their contributions and concerns.
13-12-19	Fringe community	Community meeting	33	Community fire management education. Introduction of community liaison officer.

Date	Location	Type of meeting	# of people present	Topics (Agenda) discussed
8-10-19	Fringe community	Community durbar	150	Integrated community fire management
9-13/12/12	Berekum	AFDB mission monitoring		To monitor the activities and operations of Form Ghana's in regards to its operational safeguard.
16-12-19	Fringe community	Community training	28	Community fire management training. Introduction of community liaison officer.
18-12-19	Fringe community	Community meeting	28	Community fire management training. Introduction of community liaison officer.

Table 30: social meetings held in Q4 in 2019 in Akumadan

Date	Location	Type of meeting	# of people present	Topics (Agenda) discussed
15-10-19	Akumadan	Stakeholder engagement(Ghana national fire service)	4	Domestic fire training and fire extinguisher training.
18-10-19	Akumadan	Stakeholder engagement(traditional council)	6	To discuss on the change of priority of social project from construction of toilet facility to habitation of a school.
6-11-19	Akumadan	Stakeholder engagement (police commander)	6	To discuss on illegal issues especially, poaching and illegal chain saw operation.

11-11-19	Akumadan	Stakeholders engagement (labour office)	4	To discuss on workers compensation and training the workers on their compensation.
9-12-19	Akumadan	Stakeholders engagement	35	To update stakeholders on the current of Form Ghana's activities. Also to listen to the contributions and concerns of stakeholders.
16-21/12-19	Akumadan	Social community monitoring	35	To undertake annual social monitoring of fringe communities.

5. Conclusion and recommendations

Form Ghana's management is mostly compliant with most the operational safeguards as presented by the bank. Form Ghana has annual third party verifications to monitor compliance to the principles and criteria of the Forest Stewardship Council (FSC™), which also covers most of the Operational safeguards. At local governance level, Form Ghana is compliant with the regulations as set out by EPA and WRC.

An end report for the Rap has been shared with the bank. And an evaluation by an independent consultant still needs to be done.

In terms of pesticides, Form Ghana needs to promulgate the new rules excluding the use of pesticides in any intercropping or other agricultural activity on FG land.

6. Annex 1: Results Based Logical Framework

RESULTS CHAIN		PERFORMANCE INDICATORS			MEANS OF VERIFICATION	RISKS / MITIGATION MEASURES	
		Indicator (including CSI)	Baseline 2007	Target			
IMPACT	Climate change mitigation and economic growth	Increased net GHG emissions reduction potential Contribution to GDP	0	Climate change potential of around 2.8 million tCO ₂ over 40 years = USD 1.7 million / year on average	Ghana statistics		
	OUTCOMES	Outcome 1: Reduced pressure on forest ecosystem	Number of hectare restored degraded forest land	0 ha	11.700 ha	Form Ghana planting reports Paragraph 2.6: table 4 of this report Now: 11,487.2 ha	R: Insufficient land MM: Land lease of over 140000 ha has been secured for 50 years. Ongoing negotiations to expand to 20000 ha in future
		Outcome 2: Restoration of plantations with local species	Number of hectares of assisted natural regeneration or local plantation	0 ha	10% of plantation to be local tree species	Form Ghana reports Paragraph 2.6: table 4 of this report. Now: 1,509.6 ha which is 13%	R: Spread of teak over 100% of the degraded forest land. M: Buffer strips and fire breaks to inhibit unintentional spread. New planting at 90-10 proportion for Teak – Local trees
		Outcome 3: Community development	3.1: Number of employees 3.2: No of jobs to women 3.3: Number of hectares available to intercroppers 3.4: Community development activities Benefitted from revenues (BSA) 3.5: Gender sensitive progress reports are developed	3.1: 0 3.2: 0 3.3: 0 3.4: 0 3.5: 0	3.1: 860 by 2020 3.2: 40% of jobs 3.3: ≥ 6000 ha (of which at least 25% is allocated to female farmers) 3.4: 2% of revenues allocated to community development as per BSA 3.5: Gender disaggregated data is made	Form Ghana reports and AfDB supervision monitoring reports. See paragraph 2.4.1: 710 workers of which 25.7% female. Intercroppers in 2019 are 410 of which 9 % are farmers. Intercropping has taken place over the whole teak	R: insufficient labour supply MM: Detailed pre-project evaluation of site and region by sponsor, extensive capacity building & on the job training.

RESULTS CHAIN		PERFORMANCE INDICATORS			MEANS OF VERIFICATION	RISKS / MITIGATION MEASURES
		Indicator (including CSI)	Baseline 2007	Target		
				available in progress report	area which covers 9578 hectares since 2007 Local government progress reports on their community development programs.	
	Outcome 4: Increased carbon sequestration	Annual units of CER or VCU or S/teCO2	0	≥ 2.3 MtCO2e by 2035 based on 230 tCO2e per hectare	VCS/ FSC reports Form Ghana reports and AfDB projects supervision monitoring reports See Paragraph 4.3.2: to date 365,638 MtCO2e have been sequestered. Up to 2035 an additional 2,073,441 MtCO2e will be sequestered. The total up to 2035 is then 2,439,079 MtCO2e	R: Lack of validation of the plantation for carbon sequestration. MM: Validation under VCS for existing and future plantations.
OUTPUTS	Output 1: Reforestation of degraded Forest Reserves (FR)	No of ha of Planted Area 1.1: Asubima FR 1.2: Afrenso Brohuma FR 1.3: Tain II FR	1.1: 0 ha 1.2: 0ha 1.3: 0 ha	1.1: ≥ 1500 ha 1.2: ≥ 1500 ha 1.3: ≥ 7000 ha	Form Ghana reports and AfDB project supervision monitoring reports. Paragraph 2.6: table 4 of this report. Asubima 1667,5 ha to date, Afrenso Brohuma 1779,9 ha to date and TainII 8039,9 to date	R: Fire damage, drought and land disputes MM: Implementation of best Silvicultural standards
	Output 2: Best practise in Forest Management and enhanced local forest management capacity	2.1: FSC – Forest Management Certification 2.2: Forest management trainings undertaken by FG	1: 0 2: no trainings	1: Maintain FSC certification throughout the project life – 2030 2: AT least 100% of the intercropper and FG staff farmers trained on fire prevention and on	Forest stewardship Council Reports and FSC annual audits available at FG and FSC website. See paragraph 4.1.2 FSC is maintained. Training of the workers is	

RESULTS CHAIN		PERFORMANCE INDICATORS			MEANS OF VERIFICATION	RISKS / MITIGATION MEASURES
		Indicator (including CSI)	Baseline 2007	Target		
				health and safety	partially reported upon in paragraph 4.5.4 and in the annual social report.	
	Output 3: Mitigation of social and environmental impacts and enhanced community development	3.1 Resettlement Action Plan and Social and Environmental Management Plans successfully implemented 3.2: Small crop farmers have legal access to land for farming in the Forest Reserve. 3.3: Activities identified in the SEP/CDP implemented 3.4: Gender specific grievances / concerns have been identified and addressed	3.1: 0 3.2: 0 3.3: 0 3.4: 0	3.1: Complete implementation of RAP and ESMP with regular reports to the Bank and final audit report. 3.2: Number of intercropping agreements signed and number of hectare intercropped by farmers 3.3: At least 80-% of activities implemented / achieved annually 3.4: Gender specific grievances are reported in the progress reports	Form Ghana reports or / and AfDB project supervision monitoring reports 3.1: Report available 3.2: Intercropping agreements available at offices. Intercropping has taken place over the whole teak area which covers 9578 hectares since 2007. 3.3: 25 out of 26 activities implemented (96%) 3.4: See paragraph 4.2.4. all grievances are reported in a gender neutral way but may concern gender specific topics.	R: Lack of community buy-in MM: Implementation of SEP/CDP, Community sensitisation and training and implementing the intercropping policy.
KEY ACTIVITIES	1: Forest Plantation: Establishment of 11700 ha of forest plantation				INPUTS: Equity: USD 19.4 million Cash flow from operations: USD 3 million Debt: USD 24 million (incl. USD 14 million from AfDB) Total USD 46.4 million	