ENG: Manual - Conflict Due Diligence (CDD)

Danzer Action Plan for Congo Basin (in particular, IFO, Rep. Congo)

V.3, 18 Nov. 2014

Updates in blue/ p. 9 new!

This action plan shows the implementation of the Manual - Conflict Due Diligence, a requirement for re-association with FSC. The action plan is applicable to activities of Danzer in the Congo Basin, in particular to IFO in the Rep. of Congo and relevant Danzer Head-Quarter activities. It will be used by affected personnel in order to assure proper implementation of the Manual & updated each quarter or semester.

Abbreviations:

ADHUC: Association pour les Droits de l'homme et l'Univers Carcéral (NGO from Rep. Congo)

CDD: Conflict Due Diligence

CDHD: Cercle des droits de l'Homme et de développement (NGO from Rep. Congo)

FPIC: Free, Prior and Informed Consent

FPP: Forest People Program

OCDH: Organisation Congolaise pour les Droits de l'homme (NGO from Rep. Congo)

ILO: International Labour Organisation WCS: Wildlife Conservation Society

Ref. MoU		Requirement (ENG)	Progress and actions	Progress	2013	2014	trim.	2015
FSC	Man.				4	1 2	3 4	4
V.2.	4.1	Commitment to CDD in policy, including the procedures and mechanisms how CDD will be applied, sign commitment and make public	Include in Code of Conduct and refer to the CDD manual, formally adopt the Code of Conduct, translate, and publish on the website	ОК				
-"-		Strategic partnerships on CDD	Support by local Human Rights NGOs in Rep. Congo: - OCDH since 2008 for communities' rights (last mission may/june 13; new planned Q1 2014); - ADHUC: formations sur la sensibilité au conflits/ Droits de l'homme (end 2013)	ОК				
"	4.2	CDD taken into account in formulation of all company policies	Modify "Code of Conduct", "ABC Policy" and "Risk analysis for the Rights of People." to include CDD	ОК				
-"-		Determine allocation of adequate competences and responsibilities (report to Exec Board)	Responsibilities definded in the 'Responsibility Matrix' and site procedures.	ОК				
"		Introduced in the company:						
"		- management level capacity building:	Distribute manual to all management levels and have written confirmation of commitment & implementation	ОК				
-"-		- awareness among employees	Awareness creation among workers at IFO has been done (all Staff of IFO).	OK				
-"-		- capacity building with people working on and in high-risk and conflict-affected areas;	Training has been done for all Staff at IFO. Other employees that are concerned will be trained during the action plan implementation. Training of the applicable security services in Rep. Congo (Ngombé & Ouesso) has been done.	OK, continuous				
"		- inform stakeholders regarding changes as a result of CDD	This aspect has been covered by the publication of the action plan and manual on the FSC website (https://ic.fsc.org/newsroom.9.633.htm) and the swisspeace website (http://www.swisspeace.ch/topics/business-peace.html)	ОК				
-"-	4.3	Context Assessment (Annex 4 questions)	The conflict sensitivity analysis has been done by swisspeace. This analysis will be updated for new projects or activities.	ОК				
"		CDD key questions included in risk managment procedures	The key questions of CDD have been included in the risk management procedures and impact assessments. Analysis tables have been done and finalised.	ОК				
-"-		Develop and implement risk and impact mitigation plan	Risk analysis has been done for Rep. Congo (incl. IFO). The current table includes all actions.	ОК				
"		Regularly monitor and evaluate effectiveness	 Internal audits are done. Audits by local NGO's (ADHUC, CDHD) are done. Yearly audits by the certification body are done. 	OK, continuous	1)	1) 2)	2)	
_"-		Annual progress report based on key questions to management and board	Progress on implemented actions will be done based on ths gap analysis 1) make a report/action plan for FSC and update each trimester 2) make a sustainability report (COP - Communication on Progress)	OK, continuous	1)	1) 1)	1) 1	1) 2)

Ref. MoU FSC	Ref. Man.	Requirement (ENG)	Progress and actions	Progress	2013	4 trim.	2015
	Guidanc	e Notes			4	 	,
		Hiring practices and management of staff relations					
	Prevent -	Mitigate:					
V.2. (11)		Commit to key worker's rights issues: ILO requirements for decent work, core conventions on child labor, forced labor, freedom of association, and elimination of discrimination	Included in FO's Recruitment procedure, the Policy for responsible forestry (commitment to FSC Values) and the Danzer Code of Conduct.	ОК			
		Employ local staff at different skill levels.	Compliant with IFO's recruitment procedure.	ОК			
		Develop staff recruitment guidelines which foster local employment.	Monitoring on ratio of people from different communities in the hiring practices is ongoing.	ОК			
		Develop a non-discriminatory hiring policy and be transparent about the hiring process. Take into account the ratio of peoples from different communities in the company's hiring practices.	Danzer's Code of Conduct has been translated and published on www.danzer.com. Develop employee handbooks for each location using corporate template	OK ongoing			
		Create collaborative frameworks (professional exchange, sport, topics specific to sub-region, trade barriers, etc.) between the workers from different backgrounds.	Football and handball tournaments, Dzango dance for women, petanque, Currently, all ethnic groups are participating in the activities, inlcuding youn people, woment and indigenous people.	OK, continuous			
		Strengthen social dialogue and negotiation forums or meetings with workers representatives	Procedures are implemented in IFO: Union and Workers' representatives are in place and meet regularly with Management.	ОК			
V.2. (3)		Promote multistakeholders forums inclusive of community representatives	For the management of the Forest Management Unit (FMU) "UFA Ngombé", a consultation plateform is in place ('Plateforme de concertation" since 2008. This plateform consistst of about 50 persons: community representatives (26 persons, including 1/3 women and indigenous people), local NGOs, the administration, IFO, WCS etc. In order to continously improve the participation of the communities (including Indig. people & women), following measures are ongoing: - the re-election of the representatives has been requested by letter to the President of the plateformelace for more than 5 years; - a demand is ongoing to create statutes and define more in detail the participation and rotation (re-election) of the representatives, and to define more in detail the aspects to be included in the meetings, the agenda, of the plateform. At the level of Ngombé, a camp comittee organises internal meetings and with IFO to promote activities at the Ngombé site.	OK, continuous			
	Account	for:					
		Publicize open posts widely. Communicate hiring practices among local staff as well as throughout the company.	Qualified positions are published and for non-qualified posts, the recruitment procedure is transparant. Continous communication is required.	ОК			
	GN 2	Contracting					
	Prevent-	Mitigate:					
		Develop a non-discriminatory and transparent contracting policy.	Currently no new contracts are foreseen, but to be evaluated for new contracts in 2014. A specific procedure will be developped.	ОК			
		Inform and discuss minimal standards of the company with the contractors. Ensure the commitment of contractors to the same minimal standards of the company.	The commitment for the respect of FSC standards et sociales & environm. standards has been signed by subcontractors; This commitment has been updated in order to include the all minimal standards and signed by contractors in Rep. Congo.	ОК			
	Account	for: Publicize contracting possibilities. Communicate contracting practices in the company & among local staff.	The subcontracting possibilities are known. The subcontracting procedure is going to re-inforce communication and transparency. Contracting requirements will be communicated more broadly internally.	OK			
	GN 3	Security					
	Prevent -	Mitigate:					
V.2. (7, 9, 10)		Implement measures like those outlined in the Voluntary Principles on Security and Human Rights, in particular:					
V.2. (7, 9, 10)		Regularly consult with the government and local communities about the impact of security arrangements on those communities	Follow up is done by the social team and by a local Human Rights NGO (OCDH); Human rights aspects are included in the regular meetings with the wildlife protection project between the Forest administration, WCS and IFO.	OK, continuous			
V.2. (7, 9, 10)		Hold structured meetings with public security on a regular basis (possibly as a collective action with other forest companies)	Structured meetings are going to be organised regularly (in the same way as the existing meetings for the wildlife protection project).	OK, continuous			

Ref. MoU FSC	Ref. Man.	Requirement (ENG)	Progress and actions	Progress	2013	2014		2015
V.2. (7, 9,		Report cases of physical force by public security to the appropriate authorities and to the company Head Quarter	This aspect has been included in the conflict prevention and resolution procedure and will be implemented if an incidence is occuring.	ОК	4	1 2	3 4	
V.2. (7, 9, 10)		If you provide equipment for public security, take appropriate and lawfull measures to mitigate negative consequences (monitor use).	Equipment is provided to the wildlife protection project (eco-guards). Measures are taken to prevent violation of Human Rights by training and regular meetings. The same measures (conflict resolution procedure, trainings and meetings) are applicable if provision of equipment to public security services would be provided.	OK, continuous				
V.2. (7, 9, 10)		Provide human rights training and education for the public security	A training regarding respect of human rights has been provided in 2013. This training will be repeated if necessary or annually.	OK, continuous				
V.2. (7, 9, 10)		Establish 'rules of engagement'for private security. Monitor, investigate and report on these rules.	Rules of engagement are not applicable for the private security (guards) as they have no arms. No incidence has taken place ever since the creation of IFO, with the private security service.	ОК				
	Account	for:						
V.2. (7,9, 10)		Make policies and operational guidance on relations with public security forces.	The conflict prevention and resolution procedure includes this aspect. This procedure has been updated and discussed with the stakeholders.	ОК				
V.2. (7,9, 10)		Condemn excessive violence of public forces in an open letter to the responsible person within the local administration.	If an incidence occurs, a letter will be prepared with the aid of a local NGO if necessary (ADHUC ou OCDH), as requested by the CDD Manual. This aspect was ncluded in the updated conflict prevention and resolution procedure and is implemented.	ОК				
V.2. (7,9, 10)		Publicly condemn violence against civilians and the level of insecurity in the region where the company operates.	ldem.	ОК				
		Eco-guards Eco-guards						
	Prevent-l	Mitigate:						
		Enter into a dialogue with the other parties involved in funding the eco-guards. Establish clear guidelines on responsibilities of the different stakeholders.	The current Wildlife protection protocole already mentions clearly the responsibilities. IFO is donor. Implementation of the wildlife protection project is done by the Forest Administration with technical assistance of WCS. A new protocole is in discussion and will include again he responsibilities.	ОК				
		Request that a complaints mechanism for misconduct of eco-guards is established and that they are trained in human rights and anti-corruption.	Has been developed by the Wildlife protection project (PROGEPP): mechanism for grievances and in case of misconduct. No incidences recorded with the eco-guards of the wildlife management project supported by IFO. Independent, monthly, follow up by a Human Rights consultant is done to assure implementation.	ОК				
			Organise a training of the eco-guards on Hum. Rights	ОК				
	Account	for:						
		Provide outreach among local communities about the responsibilities and mission of eco- guards.	Effectuated by WCS continously. Awareness creation will also be done during the meetings with the communities which summarize the result of the Consultation Platform (semi-annual or annual). The 2nd day of the consultation plateform meetings concerns in particular wildlife protection.	OK, continuous				
		Good governance and corruption						
	Prevent-l	Mitigate:						
			Anti Corruption and Bribery Policy is exsiting for Danzer and this aspect is included in the Code of Conduct.	ОК				
		Develop & implement an anti-corruption standard for all relevant business operations (with government agencies and other contractors).	Make a gap analysis and start working on high risk countries and activities	ОК				
		Organize periodic trainings for all employees for capacity building on the ABC (Anti Corruption and Bribery) standard.	Training of concerned personnel is ongoing: - a first training has been done end 2013; - new trainings are foreseen in 2014 (research for experts to assist is ongoing).	OK, continuous				

Gap an	alysis-AC	TION Plan	Danze	er Action Plan_C	DD Manı	ıal V3- 1	.8 Nov	2014.xlsx
Ref. MoU FSC	Ref. Man.	Requirement (ENG)	Progress and actions	Progress	2013	2014 t		2015
		Undertake a regular fraud and corruption risk assessment	Analysis has been done for Danzer. The annual Accounting audits include as well a fraud risk analysis.	OK	-	1 2	J 4	
		Promote transparency in econ. relations with the state	Tax payments are included in the annual monitoring report. The promotion of transparency has been discussed with the Congolese administration (Ministry of Forest Economy, Anti-corruption organisation of the State), AFD in Brazzaville, certain forest companies and ATIBT. A common strategy is preferred. Danzer has made taxes paid for IFO available to all interested parties before already (under Legal Documentation IFO) and decided to publish the tax payments in 2015.	ОК				
	Account	for:						
		Develop a communication strategy on issues related to corruption and transparency	Certain data are already included in the annual monitoring report. A communication strategy is being developped, if possible en partnership with other stakeholders in the forest sector. Danzer is preparing a Sustainability Report, following GRI requirements, which will include this aspect, foreseen to be published July 2015	ongoing				
		Inclusive and periodic Consultation						
	Prevent-	Mitigate:						
V.2. (2-3)		For the management plan, as well as for all developpement projects, conduct an elaborated actors-mapping including the power relations among the different stakeholders (pay special attention to women and indigenous peoples)	This is applicable in particular for new projects or the Local Development Fund. It will be evaluated if a new coordinator can effectuate this task, which will help to better identify the projects. The enforcement of capacities for the management of the Local Development Fund is ongoing: a coordinator should be recruited and the support bya a project of (EFI-REDD) is under evaluation. The recruitement of an additional personne (woman) in the social team is ongoing, which will allow to better identify the needs of women in the development projects. A cartography of actors has been done for the management of fauna by a Ph.D. student in the Forest Management Unit (UFA) Ngombé.	OK, continuous				
		Conduct an in-depth risk analysis including cleavages between the different stakeholders as well as potential entry points for mitigation.	The risk analysis coud be done by the Coordinator of the local development fund or by the social team of IFO, with the assistance of local NGO's (OCDH, ADHUC).	ongoing				
V.2. (4)		Use FPIC as a useful tool to facilitate genuine stakeholder engagement and participation.	FPIC is already implemented at IFO, but continual improvement is possible for ex. for the identification of projects for the Development Fund. FPIC has taken place for approval of the forest management plan and each year before harvest, meetings are done to receive consent of the communities affected by the harvest area (sites and trees important for the communities are protected and impacts explained by means of pictures and extend meetings. The social team has been trained to include vulnerable groups and to take into account illiteracy.	ОК				
V.2. (11)		Create a safe space of exchange between different stakeholders where information and expectations are shared and where existing local cultures and practices are respected.	The Consultation Platform ("Plateforme de concertation") in IFO assures this aspect. The Plateform includes representatives of all the communities, including vulnerable groups like Indigenous people and women. Meetings take place 1 or 2 times per year, with a consultation and restitution in all the villages (about 80 villages).	I ()K				
V.2. (11- 12)		Do community capacity building to enable people to understand their rights, and to use the range of tools that can help them defend their rights (including forest codes and certification systems)	This has been done at IFO for example on the perception towards eco-guards, the law 5-2011 on Indigenous People, the forest management plan and the use and other rights. Nevertheless, this aspect is a continous process. Before harvest, all sites and trees with a particular importance for the local communities are identified by the communities and protected. Local communities are informed about the impacts of forest harvest and impact mitigation measures are taken (for example re-establishment of the forest tracks that the communities use after harvest).	OK, continuous				
		Respect local customs in the agreement process (for example, a ritual celebration).	Local customs are respected in the agreement process (for example by ritualisation).	ОК				
	Account	for:						

Ref. MoU	Ref. Man.	Requirement (ENG)	Progress and actions	Progress	2013		14 trim.	
FSC /.2.(2)		Adapt transparent, reciprocal and open communication channels that reach out to all concerned stakeholders on a regular basis	Radio is used for communication at IFO, like the consultation plateform and meetings with the communities.	ОК	4	1	2 3	1
		Ensure that non-literate or non-francophone people have access to and understand the information (e.g. reading out, local languages).	Meeting rules are known by the social team and implemented: specific meetings with Indigenous People and women to assure that the meeting is not dominated by one group. The meetings take into account illiteracy by means of oral explanations or didactical support like pictures.	ОК				
		Include communication channels for example exchange visits, workshops, school-based materials, and various communication media, including theatre, music and radio.	This is done at IFO through Radio-emissions, installing of a library, tournaments of women (Dzango) and play tournaments in the library (knitting, artisinal work). The radio does not reach the whole FMU. It will be evaluated if other communication channels can be added in the villages. The Journal 'News from the forest', designated to workers and forest management activities, will also be distributed in the villages.	OK				
V.2. (2)		Inform and communicate to the relevant stakeholders about the forest management plan through regular and periodical means.	Conslutation about the Forest Manag. Plan has been done very intensively during the approval process (2007). Consultation takes place each year before harvest, for example to protect sites with a particular importance for local communities or to remediate impacts.	OK, continuous				
	GN7	Providing Basic Services						
	Prevent-	Mitigate:						
		Analysis of the needs and the impact of the social services on local communities with a focus on conflict mitigation (during planning as well as monitoring and evaluation).	This has been done, for example for the cahier de charges from IFO. The needs are adapted if there are changes in the meantime, for example in Attention. This aspect can be improved for the development fund. A proposal for monitoring has been prepared (EFI project in development.). A coordinator is being searched in order to improve this aspect.	OK, continuous				
		Discuss the different roles of the state and the company in building, providing and maintaining basic services and inform the beneficiaries in the local community about it.	This has been done, for example for the social contract (cahier de charges) from IFO: in the presence of the local authorities, the obligations of IFO and the state have been clearly indicated. As well, for the local development fund, this aspect is indicated in the project proposal of the communities. Nevertheless, it is important to continue the awareness creation and capacity building.	OK, continuous				
		Ensure that all communities and groups (especially indigenous peoples and women) finally profit from the impact of social investments.	Specific aspects have been taken into account, for example the construction of a school for the indigenous people's children in Ngombe, the free of charge threatment and provision of medicins in the hospital of IFO to Indigenous people. For the local development fund, this aspect should be more clearly indicated in the selection criteria, the statutes of the consultation plateform, and/or the identification of projects in order to assure that all groups of the communities benefit from the social investments.	OK, continuous				
		Diversify NGO partners that are involved in supporting social investments and communicate that you will change partners over years.	The partner NGO should be changed over time for the Development Fund. A letter has been sent to the President of the local council. A meeting has been done with the Minister concerning micro-projects, a proposal to change the Act and a plateform specific for this aspect is organised in Dec.2014, in order to improve effeciency for the development fund.	ongoing				
		Transparent and robust monitoring and evaluation processes are crucial to ensure that such arrangements are effective.	Monitoring of the projects is done. A re-inforcement is going to be done for the Development Fund by the recruitment of a coordinator and if necessary by a technical assistant. The international and national consultants for the FDL (EFI-REDD project) is analysing the development fund and will assist to make the fund more effective. A new accountant and NGO will be appointed to improve efficiency.	ongoing				
	Account	for:						
		Adapt a communication strategy on informing the communities in detail about the provision of public services by the company (expectation management)	Communication is done for example for the social contracts ('cahier de charges') from IFO: in the presence of the local authorities, the obligations of IFO and the state have been clearly indicated. For the Development Fund, this is not problematic as project proposal are come directly from the communities. The communication concerning provision of services, the management of expectations, should be adapted as these questions come back in meetings.	OK, continuous				

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Man.	Requirement (ENG)	Progress and actions	Progress				2015
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Prevent-I	wiitigate:				+	\vdash	+
	Analyze the impact of the company on the local economy and establish ways to mitigate negative impact (rising prices; poaching, prostitution).	The impact has been analysed during the socio-economic study (2004) and the social impact assessment (2007). The impacts have been taken into account. Concerning the cost of goods in Ngombé (IFO's site) compared to Ouesso (the nearby city), due to price differences, a new 'economat' has been installed with lower prices, comparable with Ouesso. Regarding hunting & poaching, surveillance is done by eco-guards in the wildlife management project, with a current coordinator that is efficient. Regarding other aspects (prostitution), it will be analysed what is feasible.	ОК				
	Develop a strategy for collaboration with local businesses for those economic activities that are directly linked to the presence of the company and forest products (see also Guidance Note 7: Contractors and Wood Residues Management).	Different companies profit currently from the economic activities that are linked to IFO, for example the production of charcoal and recuperation of wood for construction and carpentry in the Ngombé site and for the local population. The charcoal production has been given to two small enterprises.	OK, continuous				
GN 9	Conflict management process						
Prevent-I	Mitigate:						
			OK				
	Try to identify the underlying interests and needs of the company and the other party in order not to get caught in positions. Understand the reality and the political issues around 'traditional land claims' in order not to get become mired in unexamined or unjustified positions.	Training on the requirements of the manual is ongoing, but no specific problems have taken place during the existence of IFO.	ОК				
	Generate options on how to resolve the conflict, then pick the most feasible and acceptable one (e.g. community gatherings, ombudsperson, mediation through accepted elder, multi-stakeholder forms of consensus building, legal conflict management).	The procedure for conflict prevention and resolution has been adapted in order to include all possible mechanisms.	ОК				
	Respect dialogue and traditional conflict approaches in the Congo Basin. Owe up to being at fault and accept blame.	Dialogue and traditional conflict approaches are the options in the procedure to prevent and mitigate conflicts.	ОК				
	Integrate the company team that specializes on conflict management well into the rest of operations. Ways of addressing conflicts needs to be embedded into normal practice and need to be the responsibility of operational managers.	The social team is well integrated in the company and is part of the responsible forest management team ("Cellule d'aménagement").	ОК				
	Establish clear guidelines within the company on reporting on conflicts on the site but also with headquarter.	The conflict prevention and resolution procedure has been updated in order to include this aspect.	ОК				
Account	for:						
	If required by customs, ritualize agreements to ensure communal acceptance of the resolution.	Customs and ritualisation are respected: if applicable, agreements are ritualized.	ОК				
	Make sure that agreements on collective bargaining/mediation are reported back to members/ the outcome of the process is publized.	All meeting minutes are posted and distributed to the concerned people.	ОК				
	GN 9 Prevent-	Man. GN 8 Local Economy & Benefit sharing Prevent-Mitigate: Analyze the impact of the company on the local economy and establish ways to mitigate negative impact (rising prices; poaching, prostitution). Develop a strategy for collaboration with local businesses for those economic activities that are directly linked to the presence of the company and forest products (see also Guidance Note 7: Contractors and Wood Residues Management). GN 9 Conflict management process Prevent-Mitigate: Maintain regular contact and a continuous dialogue with all stakeholders in order to prevent disputes turning into conflicts (see Guidance Note 5.4). Employ a local person as main contact that will also be approached by neglected actors (indigenous peoples and women). Try to identify the underlying interests and needs of the company and the other party in order not to get caught in positions. Understand the reality and the political issues around 'traditional land claims' in order not to get become mired in unexamined or unjustified positions. Generate options on how to resolve the conflict, then pick the most feasible and acceptable one (e.g. community gatherings, ombudsperson, mediation through accepted elder, multi-stakeholder forms of consensus building, legal conflict management). Respect dialogue and traditional conflict approaches in the Congo Basin. Owe up to being at fault and accept blame. Integrate the company team that specializes on conflict management well into the rest of operations. Ways of addressing conflicts needs to be embedded into normal practice and need to be the responsibility of operational managers. Establish clear guidelines within the company on reporting on conflicts on the site but also with headquarter. Account for: If required by customs, ritualize agreements to ensure communal acceptance of the resolution.	Make ### Analyte: the impact of the company on the local economy and establish ways to mitigate regative impact (froit grincs) proubling, prostitution). ### Develop a strategy for collaboration with local businesses for those economic activities that are directly linked to the presence of the company and forest products (see also Guidance Note 2-). ### Analyte: the impact of the company on the local economy and establish ways to mitigate regative impact (froit grincs) proubling, prostitution). #### Develop a strategy for collaboration with local businesses for those economic activities that are directly linked to the presence of the company and forest products (see also Guidance Note 2-). #### Analyte: the impact of the company and forest products (see also Guidance Note 2-). #### Contractors and Wonth Residues Management). #### Analyte: the impact of the company and forest products (see also Guidance Note 2-). #### Analyte: the impact of the company and forest products (see also Guidance Note 2-). #### Analyte: the impact of the company and forest products (see also Guidance Note 2-). #### Contractors and Wonth Residues Management). #### Analyte: the impact of the company and forest products (see also Guidance Note 2-). #### Analyte: the impact has been mailable on the wildlife management process. #### Analyte: the impact of the company and forest products (see also Guidance Note 2-). #### Contractors and Wonth Residues Management process. #### Analyte: the impact of the company and forest products (see also Guidance Note 2-). #### Analyte: the impact has been mailable on the analyte administ packagement; the surface of the company in the analyte administ packagement; the surface of the company in the control of the company in the control of the decrease of the forest of the decrease of the management process. #### Analyte: the impact has been analyted during the social comminists is assured by the social management and the control of the surface of the analyte and the social team are in direc	Main Coal Economy & Senefit sharing Main Coal Economy & Senefit sharing	Analyse the impact of the company on the local economy and establish ways to miligate megative impact frising price; practing, prostlution). 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Ref. MoU FSC	Ref. Man.	Requirement (ENG)	Progress and actions	Progress	2013	14 trim	
		Grievance Mechanism					
	Prevent-	Mitigate:					
		General issues:					
		Engage with stakeholders about the design of the grievance mechanism.	The procedure has been discussed in the consultation plateform. The internal grievance mechanism has been discussed with the Workers' delegates and Unions.	ОК			
		Establish a position within the company that is responsible for the coordination of registering complaints, conducting investigation, and evaluating grievances, making the decision and informing parties throughout the process.	These posts are available at IFO: the Chief of the social team, the forest manager, and the Personnel Officer are responsible to follow up on external and internal grievances.	ОК			
		Establish culturally appropriate access points for grievances (e.g. collect verbally, conduct community meetings, telephone numbers).	All grievances have been easily collected up to now, in particular by the social team and the workers' and Unions' representatives. A suggestion box will be added as well.	ОК			
		Provide guidelines on escalation, with the possibility that serious issues are dealt with at headquarter level.	This aspect has been included in the procedure to prevent and resolve conflicts.	ОК			
		Provide periodic training on aspects of the mechanism and make information about the functioning of the grievance mechanisms public.	For the communities, the procedure has been approved in the consultation plateforme at IFO, restitution done in the villages. Recycling training should be done during the next consultation meetings. Also for the workers, training has been done.	ОК			
		Internal Grievance mechanism:					
		Establish Grievance mechanism on Group level and monitor the process	A Group Grievance mechanism has been developped. A mechanism in the Congo Basin exists, in particular, the grievance procedure that include for example the workers' grievance register, kept by the workers' delegates and union representatives. A consultation towards experts is ongoing in order to adpat the mechanism to IFO.	OK, continuous			
		Establish or identify reference documents for employee concerns (Local and national law, Code of Conduct, HR policy (e.g. discrimination, forced labour, child labour, wages and hours, working conditions, housing, and freedom of association).	Documents have been evaluated in preparation of FSC audits and internal audits.	ОК			
		Establish a mechanism on the site in the Congo Basin with a possible escalation to headquarter.	An internal grievance mechanism exists. The mechanism with a possible escalation to the headquarter has been included in the conflict prevention and resolutation mechanism. The Group mechanism should also be adapted to the Congo Basin.	OK, continuous			
		Guarantee the integrity of the complainant, for example, design the mechanism in a way that addresses fear and reprisal (e.g. by giving the possibility to submit complaints confidentially)	In the current local IFO procedure, this aspect is not clearly indicated yet. With the implementation of a Group grievance mechanism, this aspect will be taken into account.	OK, continuous			
		Include clear timelines in the design of the mechanism.	Deadlines are included in the grievance procedures.	ОК			
		Promote information on the mechanism (e.g. through training for management, posters at workplace, workers gatherings).	An awareness creation campaign has been done in 2012 at IFO. If the group mechanism requests changes to the IFO procedure, a new awareness creation and training will be done.	ОК			
		Keep the information on the complaints and monitor the results, integrate key lessons learnt.	The results of complaints are maintained and the results are followed up, compliant with the grievance mechanism.	ОК			
		Provide assistance for the complainant (e.g. unions or other organizations that support the individual).	This requirement is prescribed by law and implemented at IFO.	ОК			

Ref. MoU	Ref. Man.	Requirement (ENG)	Progress and actions	Progress	2013	2014		2015
FSC	iviaii.				4	1 2	3 4	
		Strengthen avenues or mechanisms for Conciliation, Mediation and Arbitration (CMA) as part of dispute and conflict solving especially when dealing with workplace issues.	This requirement is prescribed by law and implemented at IFO.	ОК				
		Strengthen negotiation process among social partners as inbuilt mechanism to mitigate grievances	The workers' delegates and unions keep regular meetings with the IFO management in order to attenuate the grievances.	ОК				
		Grievance mechanism with communities						
		Establish or identify reference documents for complaints (e.g. provisions of domestic law, voluntary standards adopted by the company (Code of Conduct, VPs, FSC) or standards required by financing organizations.	Documents have been evaluated in preparation of FSC audits and internal audits.	ОК				
		Establish a centralized way of receiving grievances in order to allow the company to identify the most appropriate process to handle the complaint, for example a 'Community Relations Officer' that collects grievances verbally or at local community meetings.	The social team receives the Grievances of communities. During different meetings with the communities, grievances are expressed and recorded by the social team. The procedure is well established and training has taken place, for example at Brazzaville ("Centre d'Excellence Social")	ОК				
		Inform about the mechanism at community meetings and establish community materials in local language or through engagement with local organization.	Meetings are done in local language, with supporting pictures at IFO.	ОК				
		Ensure that the community members who wish to present a complaint are provided with the necessary information on the process to follow in their own language. For example, if complainants are illiterate, write down their complaint, read it back to them for accuracy and let them sign.	People can file their complaint orally, will be registered by the social team or written in a letter by a literate person in the village.	ОК				
		Identify traditional and religious structures of dispute resolution that are respected by the people and engage with them on healing and resolution of conflicts with staff (see Guidance Note 5.4). If you include a facilitator in an escalation phase, ensure that the individual is known, respected and has an excellent standing in the region.	Direct consultation with the communities was succesfull and includes also the elderly ("Comité des sages"). To be evaluated if other mechanisms are needed. The procedure to prevent and resolve grievances and conflicts includes the use of traditional or religious structures if appropriate. It is continously evaluated if all possibilities are included in order to prevent or resolve conflicts	OK, continuous				

٨	1oU	Ref. Man.	Requirement (ENG)	Progress and actions	Progress	2013	2014 trim.	2015
	SC	iviaii.				4	1 2 3 4	
E	NG:	Man	ual - Conflict Due Diligence (CDD)	Danzer Action Plan for Congo Basin (in particular, IFO, Rep. Congo)		V.3, 1	L8 Nov. 20	14

This action plan shows the implementation of the Manual - Conflict Due Diligence, a requirement for re-association with FSC. The action plan is applicable to activities of Danzer in the Congo Basin, in particular to IFO in the Rep. of Congo and relevant Danzer Head-Quarter activities. It will be used by affected personnel in order to assure proper implementation of the Manual & updated each quarter or semester.

11 Land-, territory- and natural ressource use rights			_	+-	\blacksquare	┢
Capacity building through the forest company				₩		H
Has community understood the potential benefits and impacts of the proposed logging?	This is explained in a specific explanation sheet to the communities	OK		₩	-	4
Does the community believes it is sufficiently trained and informed (capacity readiness) to enter into		ОК				
negotiations with the company?	the methodology by Rainforest Foundation (2011, Participatory Cartography)			++		Ļ
Do members of the community, selected for mapping and participatory evaluation, agree that they are adequately trained and paid to do it?	Yes, specific training and communities are paid for their work. No negative comments received.	ОК				
Does the communities agree, that their concerns have been recorded appropriately (for ex, in	Yes, participatory cartography shows communities exactly land- and ressource use rights.	ОК				
writing, signed cards, videos), published & incorporated into the management plans.	Implemented at IFO.		4	++		Ļ
Decision-making process between the company and local communities				₩	\blacksquare	L
Has the community decided to start negotiations with the company, and has a model of decision making clearly been defined between the parties?	Yes, meetings in the villages have been done since long time and are in line with the cultural values and traditions, including all identified groups.					
Has a process of decision making been agreed within the community that ensures that decisions are made without excluding the community groups (women, indigenous peoples, ethno-linguistic minorities)?	The process of decision making is default in the region and has been agreed within the communities. Decisions are made with participating of all villages and all groups within the villages.	OK				
If desired by the communities, is there a consultation platform and an independent observer (NGOs or other representative of the communities) exist?	Yes, concertation plateform is present with representatives of communities, indigenous people and other groups. NGO's are present, including a local Human Rights NGO.	Ok				
Do the community members fully understand their rights, including their right to say no to the proposal? And did the communities have the time to vote on the proposal?	The procedure includes a clear explanation of the right to say no, which contributed to interesting discussions.	Ok		\prod		
Was the decision taken without any constraint and in accordance with the management model agreed decision?	Yes, communities are interested in the benefits of logging, but also understand the national legislation in the country.	Ok		\prod		
Is the consent published in the languages that are locally and nationally relevant? Structure within the company	Yes, french is the written language and documents are read before the communities.	Ok		井		F
Is there a social structure and a team fully trained in the company, able to create and maintain good relations with the affected communities?	Yes, a team is present. Additionnally, a woman has been recruted and a human rights expert is providing technical assistance and monitoring every month.	Ok		$\dagger \dagger$		
Is there a strategy of communication and information, which can communicate in a culturally appropriate and effectively with all members of the affected communities?	Yes, implemented since many years.	Ok		\prod		
Is there a program and a flexible budget, that meet the needs of the communities for the implementation of the FPIC process?	Yes, implemented since many years.	Ok				
Grievance mechanism in the company		1		П		Γ
Are there complaints about the implementation of the consent agreement? Is there a clear structure to take charge of complaints?	Yes, grievance mechism was in place since many years, has again been updated and distributed to all communities. A grievance mechanism for eco-gardes was added.	ОК				
ex 1: Development process of the Guidance Note 11, update of procedures at IFO and impleme						r
Procedures & Guidance note 11 development			1	П		T
Feb. 14: FPP visit to IFO with recommendations for additionnal procedure on land & ressource use ri	ights	OK			77	T
Apr. 14: Adaption of IFO procedures to include more in detail the new FPIC requirements: procedure	e, awareness creation sheets, stepwise approach to reach FPIC	ОК				
May. 14: contracting of Human Rights NGO expert (CDHD) to assist in development of new local pro-	cedures	ОК				
May 14: First Draft of new Guidance Note circulated for consultaion		ОК				
June 14: Update and finalisation of IFO procedures to include the Guidance note requirements: FPIC	on land & ressource use rights	ОК				ı
July/August 14: 2nd version of the Guidance note developped (by swisspeace and based on commer		ОК				ı
Sep. 14: 3rd version of Guidance note received by swisspeace	its from stakeholders)	OK				ı
Oct. 14/ Nov. 14: FSC Audit at IFO & FSC pilot field test on FPIC guidelines at IFO		OK				ı
			A			1
Dec. 14: approval of the last version of the Guidance note by FPP & finalising updated CDD manual		ongoing		╁┼┼	+	╄
Implementation of the Guidance note & procedures to assure FPIC & protection of land & ressourc		OK			\dashv	H
Training of IFO personnel, social team on Partipatory Cartography & FPIC Guidelines	Done by local Human Rights expert and participatory cartography/ GIS expert					l
Particip. Cartography & FPIC implementation, training of communities	Community meetings and mapping in the village finalised (by social team & local expert)	OK	A			L
Particip. Cartography field work for the 2016 logging area (and years after)	Fieldwork & GIS mapping ongoing (to be finalised march 2015	ongoing	A			
Change of the contribution of the LDF to be linked with harvest area.	Done & approved by local communities and consultation plateform	OK	4			L
Improvement of Loc. Dev. Fund projects	Ongoing (change of accountant and new local NGO to be elected)	ongoing	4			
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