

Sustainability Action Plan

June 2020 Update

The Sustainability Action Plan (SAP) aims to strengthen the company's sustainability processes and practices, implement RSPO Complaints Panel Directives and address identified issues.

Implementation of the SAP officially commenced in September 2019 with the advisory support of Earthworm Foundation (EF).

Implementation continues with most process changes already made and documented in revised Standard Operating Procedures (SOPs). Resolution of grievances with some communities, suspended in 2019 due to an RSPO directive to select an independent mediator, resumed in March this year with the first on-site engagement by ProForest. ProForest reported progress in the process of resolution. The RSPO has advised that the Complaints Panel is deliberating on the report by the mediators.

No	Area	Activity	Sub-activity	6 months						12 months						18 months						Update 31st October 2019	Update 31st Jan 2020	Update 31st May 2020
				1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18			
A GOVERNANCE																								
A.1	Structure	A.1.1	Review and strengthen organization structure (especially the sustainability team and GIS team) to allow clear role and collaboration between teams.	A.1.1.1	Review and finalization of organization structure																Completed.	Completed.	Completed.	
				A.1.1.2	Establish role function, job description, and authority level																Drafts completed. Awaiting Management review as part of company-wide restructuring. Target completion Dec 2019.	Completed. Under implementation, with Quarterly KPI setting	Completed. Under implementation, with Quarterly KPI setting	
				A.1.1.3	Resource audit and hiring of relevant people to fill in any gaps in the structure																Audit completed. Will initially focus on internal recruitment/realignment as a result of involuntary down-sizing. Completion Jan 2020.	Completed.	Completed.	
				A.1.1.4	Socialization and implementation of new organization structure																Yet to commence. Target shifted to possible restructuring. Adjusted target date Mar 2020.	Commenced. Target date Mar 2020 on course.	Commenced. But process temporarily suspended due to redundancy exercise in response to economic challenges. To resume later in the year.	
				A.1.1.5	Evaluation of organization structure																On-going. Adjusted target Mar. 2020.	On-going. Target date Mar. 2020 on course	Commenced. But process temporarily suspended due to redundancy exercise in response to economic challenges. To resume later in the year.	
A.2	Coordination and Oversight	A.2.1	Establish regular meetings on sustainability issues	A.2.1.1	Establish regular meeting on mill/plantation level and regional level																On-going.	On-going.	On-going.	
				A.2.1.2	Establish sustainability steering committee and its regular meeting																On-going.	On-going.	On-going.	
		A.2.2	Establish sustainability related Key Performance Indicators	A.2.2.1	Establish clear KPIs for sustainability team																Done.	Done.	Done.	
				A.2.2.2	Establish additional sustainability related KPIs for non-sustainability teams																On-going.	On-going.	Temporarily suspended due to redundancy exercise in response to economic challenges. To resume later in the year.	
				A.2.2.3	Evaluation of KPIs																First assessment targeted Apr. 2020.	First assessment targeted Apr. 2020.	Temporarily suspended due to redundancy exercise in response to economic challenges. To resume later in the year.	
A.3	Talent and Culture	A.3.1	Training / Capacity Building	A.3.1.1	Conduct training needs assessment to create sustainability training plan for relevant people																On-going. Target Dec 2019.	On-going. Adjusted target Mar. 2020.	Temporarily suspended due to redundancy exercise in response to economic challenges. To resume later in the year.	
				A.3.1.2	Implement and establish a training record																On-going.	On-going.	Temporarily suspended due to redundancy exercise in response to economic challenges. To resume later in the year.	
A.4	Infrastructure and logistics	A.4.1	Establish relevant policies and SOPs	A.4.1.1	Establish SOP on stakeholder management																On-going. Target Dec 2019.	Completed.	Completed.	
				A.4.1.2	Establish SOP and system to track legal requirement																On-going. Target Dec 2019.	Completed. Under implementation	Completed. Under implementation	
				A.4.1.3	Establish SOP for boundary demarcation and its maintenance																On-going. Target Dec 2019.	Completed. To be tested in Q2 2020.	Completed. Testing deferred to Q4 in view of COVID-19 challenges.	
				A.4.1.4	Review and update FPIC and PM SOP according to: Module 2 – Social requirements (version 2.0 May 2017) Module 3 – Integration of HCV HCS Forest and FPIC (version 2.0 May 2018) FPIC guide for RSPO members																Completed and being implemented. Awaiting official management approval. Target Dec 2019.	Completed and being implemented. Approved by Mgt.	Completed and being implemented.	
				A.4.1.5	Establish SOP for participatory mapping for disputed areas																On-going. Adjusted target Dec 2019.	Draft completed. Awaiting testing under Blogbo dispute in Mar-Apr 2020.	Draft completed. Awaiting testing under after resolution of Blogbo dispute, which is still awaiting RSPO decision after site visit by Independent Facilitator in March 2020.	
				A.4.1.6	Establish SOPs for mill operations in appropriate languages																SOP done; language translation yet to commence. Target Mar 2020.	SOP done; language translation yet to commence. Target Mar 2020.	SOP done; language translation yet to commence. Target adjusted to Sep 2020, or as soon as COVID-19 situation permits physical consultation in the translation process.	
				A.4.1.7	Establish SOP for monitoring of environmental management plan, implementation, and reporting																Draft almost completed. Adjusted target Dec 2019.	Completed. Under test.	Completed. Under test.	
				A.4.1.8	Establish SOP for HCV HCS Peat management and monitoring																Draft almost completed. Adjusted target Dec 2019.	Draft completed. Awaiting testing under EF assessment Q2 2020.	Draft completed. Awaiting testing under EF assessment later in the year, subject to improvement in the COVID-19 situation.	
				A.4.1.9	Establish SOP and system for grievance handling for both external and internal stakeholders. Also add mediation step before legal option.																Draft almost completed. Adjusted target Dec 2019.	Completed. In use.	Completed. In use.	
				A.4.1.10	Establish SOP to describe the process of information sharing and dissemination																Draft almost completed. Adjusted target Dec 2019.	Completed.	Completed.	
				A.4.1.11	Review the recently announced Human Rights Defender Protection protocol by the RSPO and develop policy on human rights																On-going. Adjusted target Dec 2019.	On-going. Adjusted target Apr. 2020.	On-going. Target adjusted to as soon as COVID-19 situation permits physical consultation in the process.	
				A.4.1.12	Review Greenbook SOP to be clearer on pest attack intensity and IPM																On-going. Adjusted target Dec 2019.	Completed.	Completed.	
				A.4.1.13	Revise Greenbook SOP section 6.5.3 on empty pesticide package disposal																On-going. Adjusted target Dec 2019.	Completed.	Completed.	
				A.4.1.14	Review recruitment policy to include a statement on no recruitment of workers under 18 years old																On-going. Adjusted target Dec 2019.	Completed.	Completed.	
				A.4.1.15	Review recruitment policy to include non discrimination based on sexual orientation, union membership, and political affiliation																On-going. Adjusted target Dec 2019.	Completed.	Completed.	
				A.4.1.16	Update policy of promotion to include non-discrimination promotion																On-going. Adjusted target Dec 2019.	Completed.	Completed.	

B ENVIRONMENTAL MANAGEMENT																	
B.1	No development of and conservation of HCS areas	B.1.1 Organize a training on the new HCS Approach especially on: oModule 2 – Social requirements (version 2.0 May 2017) oModule 3 – Integration of HCV HCS Forest and FPIC (version 2.0 May 2018)	B.1.1.1	Explore opportunity for HCS training with HCSA Africa and attend training when available										Internal training adjusted to Jan 2020. Exploring appropriate training opportunities in Africa for 2020.	Internal training re-adjusted to Apr 2020. Exploring appropriate training opportunities in Africa for 2020.	Internal training re-adjusted indefinitely to later in 2020, due to travel restriction under COVID-19 . Exploring appropriate training opportunities in Africa for 2020.	
			B.1.1.2	Obtain approval from HCSA on the reports and maps										Yet to commence. Adjusted target Jan 2020 to allow for on-going consultation with HCSA.	Commenced. Awaiting outcome of on-going consultation with HCSA.	Commenced. Awaiting outcome of on-going consultation with HCSA.	
		B.1.2 Review the previous HCS work (Grand Kru & Sinoe) in alignment with the new HCS Approach toolkit (Integration of the community livelihoods programme (COPP perspective and alternative livelihoods)	B.1.2.1	Review all HCS work (Grand Kru and Sinoe) and produce new updated HCS reports and maps to be submitted to HCSA											On-going. Target completion Oct 2019	Done.	Done.
			B.1.2.2	Ground check of HCS clearance claim and develop remediation action. Develop and implement the ICLUP (Integrated Conservation and Land Use Planning)											On-going. Target completion adjusted to Dec 2019 due to sever constraints on mobility (road condition).	On-going. Target completion re-adjusted to Apr 2020 as part of EF assessment. Target completion Apr 2020.	On-going. Target completion re-adjusted again to later in 2020 as part of EF assessment, due to COVID-19 travel restrictions.
			B.1.2.3	Define a prospective land acquisition plan for all the new development (Example: Barclayville, Juazon, etc.)											Yet to commence. Subject to further consideration on the proposed new areas. Expansion drive suspended indefinitely.	Yet to commence. Subject to further consideration on the proposed new areas. Expansion drive suspended indefinitely.	Yet to commence. Subject to further consideration on the proposed new areas. Expansion drive suspended indefinitely.
B.2	No development of and conservation of HCV areas	B.2.1 Develop management and monitoring plan as well as implementation for protecting the HCV area.	B.2.1.1	Development of management and monitoring plan according to established HCV maps									On-going. Adjusted target Mar 2020, subject to completion of HCV-HCS re-assessment.	On-going. Re-adjusted target Jun 2020, subject to completion of HCV-HCS re-assessment.	Subject to completion of HCV-HCS re-assessment.		
			B.2.1.2	Conduct socialization to Operations, workers and community to increase awareness and protection of HCV and HCS areas									On-going as part of community and employee engagement.	On-going as part of community and employee engagement.	On-going as part of community and employee engagement.		
			B.2.1.3	Conduct field inspections conducted regularly to ensure implementation of mitigation plan										Inspection on-going routine. To be reviewed and consolidated subject to completion of HCV-HCS re-assessment by Mar 2020.	Inspection on-going routine. To be reviewed and consolidated subject to completion of HCV-HCS re-assessment by Jun 2020.	Inspection on-going routine. To be reviewed and consolidated subject to completion of HCV-HCS re-assessment.	
B.3	Yield improvement without intensification of use of chemical pesticides and fertilizers	B.3.1 Establishment of integrated pest management	B.3.1.1	Establishment of IPM Plan, which contain identification of potential pests and thresholds, technic use to control (cultural, biological, mechanical and physical methods) pest attacking, identify and plant native species used as part of biological control method refer to SOP and Concession Agreement.									Draft 70% completed . Target date Jan 2020.	Completed.	Completed.		
			B.3.1.2	Having well documented IPM implementation records including records of training to IPM workers										On-going. Target date Dec 2020.	Completed.	Completed.	
		B.3.2 Proper usage of POME for	B.3.2.1	Conduct study of the optimum area for POME application for effluent mill with capacity 40 mt FFB/hour and for new pond capacity.										On-going. Draft report awaiting Management review and adoption.	Draft report under Management review.	Completed.	
			B.3.2.2	Tarjuowon North (TNRE) estate/TRIM needs to record how much the total POME application, replace broken flowmeter										On-going. Under analysis.	Completed.	Completed.	
			B.3.2.3	Building of additional POME pond										Yet to commence. Subject to on-going research	Yet to commence. Subject to on-going research	Yet to commence. Subject to on-going research.	
B.4	Greenhouse gas emissions	B.4.1 Report and reduce greenhouse gas emissions	B.4.1.1	Conduct assesment of pollution and GHG emission resource from the entire operational aspect .									On-going. Target completion Oct 2019	Completed.	Completed.		
			B.4.1.2	Establish action plan to mitigate or reduce the pollution and GHG emission.										On-going. Awaiting Management review. Target Dec 2019.	Completed.	Completed.	
			B.4.1.3	Calculate the operational GHG emission using RSPO GHG calculator ver.3.1 and report it to RSPO.										Done. Iterrative process.	Done. Iterrative process.	Done. Iterrative process.	
B.5	Waste management	B.5.1 Improve waste management	B.5.1.1	Check BOD and other parameter in POME discharge to plantation refer to regulation.									Done. Iterrative process.	Done. Iterrative process.	Done. Iterrative process.		
			B.5.1.2	Engage the government about the license/permit for the hazardous warehouse base on the EMPL Regulation Section 64.									Engagement done. Licencing process under periodic review.	Engagement done. Licencing process under periodic review.	Engagement done. Licencing process under periodic review.		
			B.5.1.3	Stored and disposed used chemicals and their containers responsibly according to GVL Procedure, EMPL and best practices.										Done. Iterrative process.	Done. Iterrative process.	Done. Iterrative process.	
			B.5.1.4	Have well documented waste management and disposal plan to avoid or reduce pollution.										On-going. Updated plan to be reviewed with EPA for adoption. Target completion Jan 2020.	Completed.	Completed.	
			B.5.1.5	Arrange logbook for hazardous warehouse. Some of the amount must refer to the logbook of general warehouse. For example amount of ex-pesticide bin in to the hazardous warehouse must be consider to the amount of pesticide bin put from chemical warehouse.										On-going.	On-going.	On-going.	

C SOCIAL AND COMMUNITY ENGAGEMENT																		
C.1	FPIC Process	C.1.1 Review all FPIC process to fulfill any process and documentation gaps	C.1.1.1	Review and update the FPIC documentation process in alignment with the SOP that will be updated. This include improvement of scoping process and identification of community's self chosen representatives											Done. Awaiting Management adoption.	Completed	Completed.	
			C.1.1.2	Conduct the boundary demarcation based on FPIC procedure with clear markers and maintain them regularly.												In collaboration with Liberia Lands Authority (LLA) . Implementation target dered to 2020, due to review of funding mechanism.	In collaboration with Liberia Lands Authority (LLA) . Implementation target deferred to 2020, due to review of funding mechanism.	In collaboration with Liberia Lands Authority (LLA) . Implementation target deferred to later in 2020, due to review of funding mechanism.
			C.1.1.3	Improve ESIA report by conducting participatory SIA assessment . Develop plans for avoidance or mitigation of negative impacts and promotion of the positive and monitoring of impacts												New ESIA yet to be undertaken. Subject to permit renewal schedule. Will incorporate.	New ESIA yet to be undertaken. Subject to permit renewal schedule. Will incorporate.	New ESIA yet to be undertaken. Subject to permit renewal schedule. Will incorporate.
			C.1.1.4	Develop a monitoring system with regular reporting to outline the plan on mitigation, implementation and monitoring according to the SIA report.												Yet to commence.	Yet to commence.	Yet to commence. Subject to implementation of ESIA.
	C.1.2	Review all MOUs to fulfill any process, documentation gaps and the implementation level of each MOUs signed	C.1.2.1	Converting provisional MOUs to permanent MOUs, whether to include maintenance and refurbishment schedules (for specified period) in updated Social Agreements.												On-going . Target completion July for Sinoe yet to be realized, to allow further time for community consultaion of their diaspora. Realistic target Mar 2020. Target for Grand Kru adjusted to Mar 2020, to allow for mobility, and adequate community consultation.	On-going . Target completion July for Sinoe yet to be realized, to allow further time for community consultaion of their diaspora. Realistic target Mar 2020. Target for Grand Kru adjusted to Mar 2020, to allow for mobility, and adequate community consultation.	On-going . Target completion July 2019 for Sinoe yet to be realized, to allow further time for community consultaion of their diaspora. Target completion depends on COVID-19 situation and responsiveness of communities in securing legal advise and making their input.
			C.1.2.1.1	Butaw												Already Permanent. Annual review each end of year.	Already Permanent. Annual review each end of year.	Already Permanent. Annual review each end of year.
			C.1.2.1.2	Tarjuowon												Already Permanent. Annual review each end of year.	Already Permanent. Annual review each end of year.	Already Permanent. Annual review each end of year.
			C.1.2.1.3	Others												Yet to commence. Adjusted target Marc 2020.	Yet to commence. Adjusted target Mar 2020.	Yet to commence. Adjusted target subject to COVID-19 situation and responsiveness of communities in securing legal advise and making their input.
			C.1.2.2	Define a company standard (quality, type, budget, ...) for each type of infrastructure to be constructed or rehabilitated												Done.	Done.	Done.
			C.1.2.3	Prepare the budget needed to fill the implementation gaps as per the agreed timeframe of each MOUs signed												Done.	Done.	Done.
			C.1.2.4	Improve joint monitoring (GVL and communities) of MoU implementation and release an annual report												On-going. Report target Dec 2019. may be delayed by mobility constarints (roads).	Completed. Reports under review with communities and NBC.	Completed. Reports under review with communities and NBC.
			C.1.2.5	Clarify to the communities the following concept: areas developed/planted, areas developed non planted (infrastructure, conservation, etc.) areas non developed non planted (conservation areas) and the implication on communities benefits (CDF, employment, taxes, etc.)												On-going	On-going	On-going
			C.1.2.6	Review development maps (from the base maps including the version shared with local communities) and conduct the reconciliation process												On-going. Target Dec 2020 to account for mobility constraints.	On-going. Target re-adjusted to Apr 2020.	On-going. Target re-adjusted to Apr 2020.
			C.2	Responsible handling of conflict and grievances, and resolution of conflict	C.2.1 Improve the system to ensure that complaints or grievances including land claims are addressed or resolved in an effective, timely and appropriate manner (internal and external)	C.2.1.1	Socialize SOP on grievance and conflict handling and have a proper documentation and resolution process. Deeper training for social team including use of complaint management table and assign a team member per estate to be in charge of the complaint management table											On-going. Target Dec 2020 to account for mobility constraints.
C.2.1.2	Establish internal grievance committee including Operation & Sustainability.														Done. On-going.	Done. On-going.	Done. On-going.	
C.2.1.3	Ensure that all documents related to grievance resolution are properly stored and access to the document															Done. On-going.	Done. On-going.	Done. On-going.
C.2.1.4	Conduct monthly review and summary of grievances and complaint in each Estate and feed the Top Management dashboard to support decision making in term of improvement (stakeholder engagement, etc.)															On-going.	On-going.	On-going.
C.2.1.5	Create awareness to communities on GVL grievance management system															Started in May 2019. On-going.	Started in May 2019. On-going.	Started in May 2019. On-going (iterative).

D.1.7	Provide education access for all children	D.1.7.1	Conduct the education need assessment to analyse the infrastructure requirement for education implementation in the farm. This is to ensure the which public government school that available and which public company's sponsored school needs to set up (Please see CBA page 12)																			Commenced . An Education Support Program under implementation from 2019-20 academic year. Includes support to additional 22 public schools in operational areas. Adjustment currently under discussion for anticipated delays.	On-going . An Education Support Program under implementation from 2020-21 academic year. Includes support to additional 22 public schools in operational areas. Adjustment compensated for by payment of education allowance for eligible employees for 2019-2020 academic year.	On-going . An Education Support Program under implementation from 2020-21 academic year. Includes support to additional 22 public schools in operational areas. Adjustment compensated for by payment of education allowance for eligible employees for 2019-2020 academic year. Infrastructure and furnishing work on-going, to be completed Aug 2020. Teach and learning materials, and stoend support to volunteer teachers to commence with 2020-21 academic year in Sep 2020.				
		D.1.7.2	Engage CRC and relevant parties to arrange the planning for education facilities as promised in the CA																				Commenced . Communities part of the Education Support Program under implementation from 2019-20 academic year. Includes support to additional 22 public schools in operational areas.	Commenced . Communities part of the Education Support Program under implementation from adjusted 2020-21 academic year. Includes support to additional 22 public schools in operational areas.	Commenced . Communities part of the Education Support Program under implementation from adjusted 2020-21 academic year. Includes support to additional 22 public schools in operational areas.			
		D.1.7.3	Engage the government (MOE) to set up "Free and Compulsory Early Childhood Education" base on national Liberia program 2017 in the farm for all of the children in the farm and the community within age 3 to 5 (Please see CBA page 12).																					Commenced . MOU arrangement with MoE under the Education Support Program	Commenced . MOU arrangement with MoE under the Education Support Program	Commenced . MOU arrangement with MoE under the Education Support Program		
		D.1.7.4	Propose sufficient transportation to reach the school for worker children as well as community near the site.																					On-going. To be upgraded as part of the Education Support Program .	On-going. To be upgraded as part of the Education Support Program .	On-going. To be upgraded as part of the Education Support Program .		
		D.1.7.5	Propose to build the company sponsored school base on the assessment.																					On-going	On-going	On-going		
		D.1.7.6	Communicate to the national and internal stakeholder on education plan and progress in GVL.																					On-going	On-going	On-going		
		D.1.7.7	GVL can propose the specific class for palm oil lesson to enhance the education of local people about palm oil so later the community might be join to GVL as employee.																					Yet to commence. Target Apr 2020	Yet to commence. Target Apr 2020	Yet to commence. Target adjusted to Q4 2020.		
		D.1.7.8	Involve the GVL staff as the teacher in the school and LCC can set up the curriculum for that.																					Yet to commence. Target Apr 2020	Yet to commence. Target Apr 2020	Yet to commence. Target adjusted to Q4 2020.		
	D.1.8	Develop the capacity building for all of the worker	D.1.8.1	Conduct HIV Aids, Ebola, and Malaria awareness training as requested in the CBA																			On-going. To be intensified.	On-going. To be intensified.	On-going. To be intensified.			
			D.1.8.2	Develop learning center committee (LCC) to handle the training																				Yet to commence. Target date Oct 2019	Yet to commence. Target date adjusted Apr 2020	Yet to commence. Target adjusted to Q4 2020.		
	D.1.9	Establish system to prevent and handle sexual harrasment	D.1.9.1	Arrange the procedure to handle the sexual harrasment and persecution case																			Yet to commence. Target date Aug 2020	Yet to commence. Target date adjusted Apr 2020	Yet to commence. Target adjusted to Q4 2020.			
			D.1.9.2	Form a gender committee																				Yet to commence. Target date Aug 2020	Yet to commence. Target date adjusted Apr 2020	Yet to commence. Target adjusted to Q4 2020.		
			D.1.9.3	Socialization on sexual harrasement persecution and the way to report the case base on SOP made before																				Yet to commence. Target date Aug 2020	Yet to commence. Target date adjusted Apr 2020	Yet to commence. Target adjusted to Q4 2020.		
	D.2	Respect the right of association and collective bargaining	D.2.1	Ensure proper engagement with union	D.2.1.1	Evaluate about the membership of union. It suppose to be voluntary however the current situation indicate that all new worker are automaticly become a member																		Part of on-going CBA review and company restructuring.	Part of on-going CBA review and company restructuring.	Completed. Part of CBA review and on-going company restructuring.		
D.2.1.2					Engage the union to arrange the financial report of membership fee and report to the member																				On-going.	On-going.	On-going.	
D.2.1.3					Arrange the program of capacity building for union organizer																					Yet to commence. Subject to on-going CBA review and company restructuring.	Yet to commence. Subject to on-going CBA review and company restructuring.	Yet to commence. Part of consultation process with Union, after the completed CBA review and on-going company restructuring.
D.2.1.4					Set up in collaboration with worker's union a social clause which prioritize consultation and brainstorming with the management around issues																					Part of on-going CBA review and company restructuring.	Part of on-going CBA review and company restructuring.	Yet to commence. Part of consultation process with Union, after the completed CBA review and on-going company restructuring.
D.2.1.5					Raise awareness/socialize workers and union on the corporate mindset and culture																					Part of on-going CBA review and company restructuring.	Part of on-going CBA review and company restructuring.	Yet to commence. Part of consultation process with Union, after the completed CBA review and on-going company
D.3	Health and Safety	D.3.1	Conduct risk analysis of safety and health and implementing action plan	D.3.1.1	Conduct hazard identification and risk assessment of all part of workplace in the mill and estate. Arrange the action plant to determine the control of the risk base on the risk management hierarchy																		Assessment on-going.	Assessment on-going. Target Apr 2020.	Done.			
				D.3.1.2	Socialization the HIRADC to the worker																				Yet to commemnce. Adjusted target Dec 2019.	Yet to commemnce. Adjusted target Jun 2020.	Yet to commemnce. Adjusted target Jun 2020.	
				D.3.1.3	Put the first aid kit in the certain location base on identification (mill)																					Done.	Done.	Done.
				D.3.1.4	Select the PIC for emergency coordination and train them for the accident emergency action (mill)																					PIC identified. Training commenced. Target date Nov 2020.	PIC identified. Training commenced. Target date Nov 2020.	PIC identified. Training commenced. Target date Nov 2020.
				D.3.1.5	Arrange JSHC in every site that consist of management and worker/union																					Not yet commenced with union	Not yet commenced with union	Not yet commenced. Consultation with Union on-going. Target Sep 2020.
				D.3.1.6	Install more signboard and poster related to OSH implementation																					On-going.	On-going.	On-going.

D.3.1.7	Select the PIC for emergency condition and train them for the accident emergency action (farm)																									PIC identified. Training on-going. Target Dec 2019.	PIC identified. Training on-going. Target Dec 2019.	PIC identified. Training on-going. Target Dec 2020.
D.3.1.8	Socialize to the emergency handling to the high risk workplace workers																									Yet to commence. Target date Jan 2020	Done. Periodic review on-going	Done. Periodic review on-going
D.3.1.9	Review annually the HIRADC base on the operational evaluation or accident happen during a year																									Yet to commence. Target date Aug 2020	Yet to commence. Target date Aug 2020	Yet to commence. Target date Aug 2020
D.3.1.10	Emergency socialization for all of the worker																									Yet to commence. Target date Aug 2020	Yet to commence. Target date Aug 2020	Yet to commence. Target date Aug 2020

