

Sustainability Action Plan August 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 2018 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 Aug 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.
				A.1.1.2	Establish role function, job description, and authority level																				Completed. Under implementation, with Quaterly KPI stetting
				A.1.1.3	Resource audit and hiring of relevant people to fill in any gaps in the structure																				Completed.
				A.1.1.4	Socialization and implementation of new organization structure																				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																				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.
				A.2.1.2	Establish sustainability steering committee and its regular meeting																				On-going.
		A.2.2	Establish sustainability related Key Performance Indicators	A.2.2.1	Establish clear KPIs for sustainability team																				Completed
				A.2.2.2	Establish additional sustainability related KPIs for non-sustainability teams																				Temporarily suspended due to redundancy exercise in response to economic challenges. To resume later in the year.
				A.2.2.3	Evaluation of KPIs																				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 Build	A.3.1.1	Conduct training needs assessment to create sustainability training plan for relevant people																				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																				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																				Completed.
				A.4.1.2	Establish SOP and system to track legal requirement																				Completed. Under implementation
				A.4.1.3	Establish SOP for boundary demarcation and its maintenance																				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.

		A.4.1.18	Establish policy on forced trafficked labor																		Completed.
		A.4.1.19	Establish SOP for waste management that cover all of the waste produced by operational including domestic waste.																		Completed.
		A.4.1.20	Establish policy to circumvent instigated violence to maintain peace and order																		Completed.
		A.4.1.21	Establish SOP for third party FFB sourcing																		Completed.
		A.4.1.22	Establish SOP for pollution and GHG emission mitigation or reduction																		Completed.
A.4.2	Data and document man	A.4.2.1	- Establish clear filing system for data and documents - Ensure that documents and records are protected and retrieval (clarify the responsibilities and authorities for back up and the medium to be used) - Establish systematic endorsement of documents shared with the communities (meeting minutes, maps, etc.)																		Completed. In operation.
		A.4.2.2	Establish a clear hand over procedure and induction for new personnels on sustainability																		Completed.
		A.4.2.3	Strengthen the sustainability team in the documentation and filing system (hard and soft copy). Need to be enforced through KPIs																		Done. In operation.
		A.4.2.4	Strengthen the capacity of the sustainability team to ensure rigorous data record (meeting minute, evidences, endorsements, ...) for every meeting with communities/ complaints.																		Done. In operation.
		A.4.2.5	Evaluation of data and document management																		On-going. Target adjusted to Dec 2020.

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	B.1.1.1	Explore opportunity for HCS training with HCSA Africa and attend training when available												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												Commenced. EF field assessment planned Sep 2020 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												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)												
		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.	
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											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.
				B.2.1.3	Conduct field inspections conducted regularly to ensure implementation of mitigation plan												
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.											Completed.	
				B.3.1.2	Having well documented IPM implementation records including records of training to IPM workers												

		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.																							Completed.
				B.3.2.2	Tarjuwon North (TNRE) estate/TRJM needs to record how much the total POME application, replace broken flowmeter																							Completed.
				B.3.2.3	Building of additional POME pond																							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 .																							Completed.
				B.4.1.2	Establish action plan to mitigate or reduce the pollution and GHG emission.																							Completed.
				B.4.1.3	Calculate the operational GHG emission using RSPO GHG calculator ver.3.1 and report it to RSPO.																							Done. Iterative 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. Iterative 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.
				B.5.1.3	Stored and disposed used chemicals and their containers responsibly according to GVL Procedure, EMPL and best practices.																							Done. Iterative process.
				B.5.1.4	Have well documented waste management and disposal plan to avoid or reduce pollution.																							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.
				B.5.1.6	Develop the implementation of 3R (Reduce, Reuse, Recycle) and separation of domestic waste into organic and inorganic waste to simplify the management.																							Completed.
B.6	Energy efficiency	B.6.1	Improve energy efficiency	B.6.1.1	Improve efficiency of the use of fossil fuel and optimization of renewable energy.																							Yet to commence. Background data available and being updated. Target date re-adjusted to Dec 2020.
				B.6.1.2	GVL should calculate how much renewable energy use per ton CPO or palm product, estimated fuel use by on-site contract workers and transport and machinery operations and electricity use in operations.																							Yet to commence. Background data available and being updated. Target date Dec 2020.

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												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 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.	
				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. 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.	C.1.2.1													On-going . Target completion July 2019 for Sinoe yet to be realized, to accommodate further time required by community for consultaion with 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.
					C.1.2.1.2	Tarjuowon												Already Permanent. Annual review each end of year.
					C.1.2.1.3	Others												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.
					C.1.2.3	Prepare the budget needed to fill the implementation gaps as per the agreed timeframe of each MOUs signed												Done.
C.1.2.4	Improve joint monitoring (GVL and communities) of MoU implementation and release an annual report												Completed. Reports under review with communities and NBC.					

			<p>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.)</p>																				On-going
			<p>C.1.2.6 Review development maps (from the base maps including the version shared with local communities) and conduct the reconciliation process</p>																			On-going. Some communities seeking third party support for verification of boundaries and acreages.	

D.1. 3	Ensure provision of prop	D.1.3.1	Identify the worker who have not signed a contract	■	■	■												Completed for existing employees.	
		D.1.3.2	Make sure the worker keep the copy of the contract																Done.
		D.1.3.3	Consider the workers who do not speak english, and arrange the contract with their language						■	■									Done.
		D.1.3.4	Revise the contract format, and add on the other relevant information i.e. working hours, union membership and the membership fee																Revision done. Ammendments incorporated into tcompleted CBA review; will be concluded when organizational restructuring is finalized.
D.1. 4	Ensure proper salary administration and on time payment	D.1.4.1	The deduction of salary should have an agreement from the relevant workers. So, for current workers who have had a contract so company needs to arrange the power of attorney to company to deduct their salary for NASSCORP, union, etc	■	■	■												On-going.	
		D.1.4.2	Consider to implement the regulation that stated in the HR manual to review the basic salary annually							■	■								On-going.
		D.1.4.3	Propose to initiate a living wage study for the workers															■	Yet to commence. Awaiting national DLW benchmark, with RSPO support.
D.1. 5	Ensure compliance of wd	D.1.5.1	Conduct the SOP of finger printing	■	■													On-going. Target Dec 2020.	
		D.1.5.2	Conduct the procedure/policy of break time of worker that need to stand by i.e. security, machine operator in mill, etc	■	■														On-going. Part of completed CBA review and company restructuring.
		D.1.5.3	Working hour procedure in CBA needs to adjust to the regulation stated in HR and Employment refference Manual	■	■														On-going. Part of completed CBA review and company restructuring.
		D.1.5.4	Procedure to conduct the over time working (overtime agreement letter, detail payment).	■	■														On-going. Part of completed CBA review and company restructuring.
		D.1.5.5	Manage the working and overtime hour for FFB driver at the certain condition. i.e ffb truck driver stuck due to bad road condition.	■	■														On-going. Part of completed CBA review and company restructuring.
D.1. 6	Implementation of Child Labor and forced labour policy	D.1.6.1	Ensure proper working permit for all expat staff	■	■													On-going. Updated for all relevant staff.	
		D.1.6.2	Increase the socialization on No Child Labor and no forced labour through poster or directly in the morning muster.								■	■							On-going (iterative).
		D.1.6.3	Socialization to the community about No child labor.									■	■						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 spnsored school needs to set up (Please see CBA page 12)	█	█	█																				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. Infarstructure and furnishing work completed. Teaching and learning materials, and stipend support to volunteer teachers to commence with 2020-21 acedemic year in Sep 2020.		
		D.1.7.2	Engange 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 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.	
		D.1.7.4	Propose sufficient transportation to reach the school for worker children as weel as community near the site.							█	█																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 assesment.							█	█																On-going	
		D.1.7.6	Communicate to the national and internal stakeholder on education plan and progress in GVL.																		█	█	█	█				On-going
		D.1.7.7	GVL can propose the spesific 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 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 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 awareens training as requested in the CBA	█	█	█																			On-going. To be intensified.			
		D.1.8.2	Develop learning center commiittee (LCC) to handle the training																							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 adjusted to Q4 2020.			
		D.1.9.2	Form a gender commiittee																							Yet to commence. Target adjusted to Q4 2020.		
		D.1.9.3	Socialization on sexual harrasment persecution and the way to report the case based on SOP made before																							Yet to commence. Target adjusted to Q4 2020.		

