

Monthly Report

July 2024

RMG Sustainability Council (RSC)



Empowering all our customers with a comprehensive safety and compliance system driven by a customer-centric and solution-oriented approach, remaining relevant in an ever-evolving landscape through continuous improvement, transparency, and integrity.

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We value your feedback on this document.

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RSC in brief

The RMG Sustainability Council (RSC) is a safety monitoring body in the RMG sector of Bangladesh. It is a private initiative of the Bangladesh Industry, global brands, and global and local trade unions. The operations of the Bangladesh Accord were transitioned to the RSC. Our vision is to empower all our customers with a comprehensive safety and compliance system driven by a customer-centric and solution-oriented approach, remaining relevant in an ever-evolving landscape through continuous improvement, transparency, and integrity. Our expertise lies in:

- Fire, Electrical, Structural, and Boiler associated hazards identification by local & international standards.
- Advise remediation plans to mitigate safety risks.
- Communication & follow-up on the identified issues and implement a firm warning procedure to ensure the production facilities do not fall behind on remediation.
- Ensuring enough training and capacity development of the safety committee members in the production facilities to identify and manage workplace safety risks.
- Ensure an independent complaints mechanism that ensures the anonymity of the complainant and follows up on their right to a safe workplace. Going forward we will also have a wing where environmental sustainability will be monitored and assessed.



MONTHLY UPDATE ON THE INSPECTION PROGRAMME

STATUS OF INSPECTION PROGRAMME (As of July 2024)

The RSC inspection programme consists of Structural, Electrical, Fire, and Boiler safety inspections. This section of the report represents the total number of inspections conducted by RSC since its inception¹. The RSC carried out **18,089** inspections from June 2020 to July 2024 (among a total of **63,916** inspections by the safety initiative since 2014).

- RSC engineers conducted **1,724 (covered and non-covered factory)** initial inspections in the RSC period among the total of **8,120** initial inspections.
- RSC engineers conducted **16,365** follow-ups and other safety inspections in the RSC period, among the **55,796** follow-up and other safety inspections.

Following the initial inspections, the factory and the brands are tasked to develop a Corrective Action Plan (CAP) that details the time-bound remedial action(s) for completion which is based on the severity of the findings. RSC regularly coordinates with the factories to ensure that the outstanding CAPs are being completed and conducts follow-up inspections to monitor that the remediation processes are duly implemented. Other safety inspections include post-incident inspections, OSH complaints initial inspections, fire safety inspections, OSH complaints verification inspections, unannounced OSH complaint inspections, and inspections based on the Safety Committee Walk Through. Factories are now being inspected within 4 – 5 months' interval which was 8 months before.

¹ RSC commenced its inspection and remediation programme in July 2020.



FACTORY COVERAGE (As of July 2024)

- Covered factory account number: 1805
- **13** new "Independent factories" were listed through the industry (BGMEA, BKMEA) for participating in the RSC's inspection and remediation programme.
- As of July 2024, **81** factories were waiting for initial inspection.

The following graph shows the total factories being covered by RSC from November 2023 to July 2024.

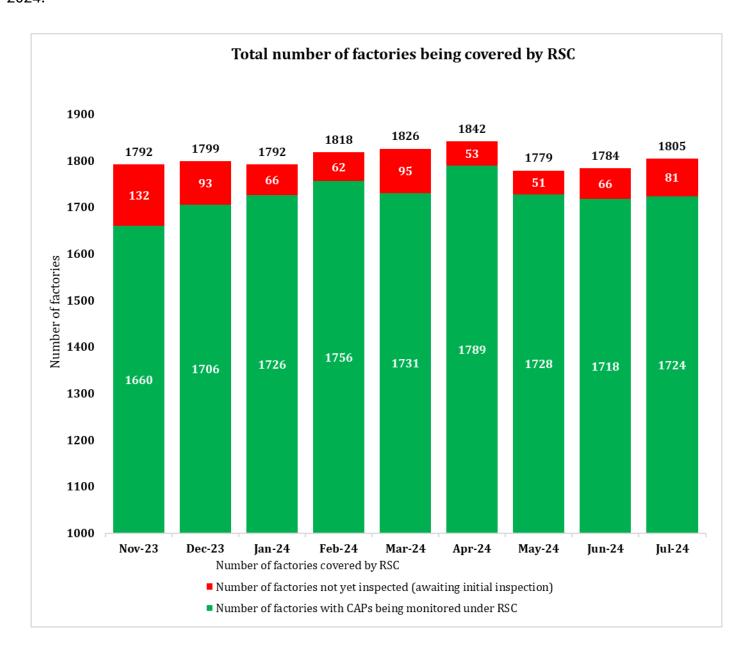


Figure 1: Number of factories covered by RSC



INSPECTIONS HIGHLIGHTS

- Total number of inspections: 383 in July.
- Number of unique factories inspected: **284** in July.
- The total inspection number is **1.34** more than the number of unique factories covered, indicating multiple inspections conducted simultaneously.
- In July the total Initial and Follow-up Inspections decreased from last month due to nationwide unrest.

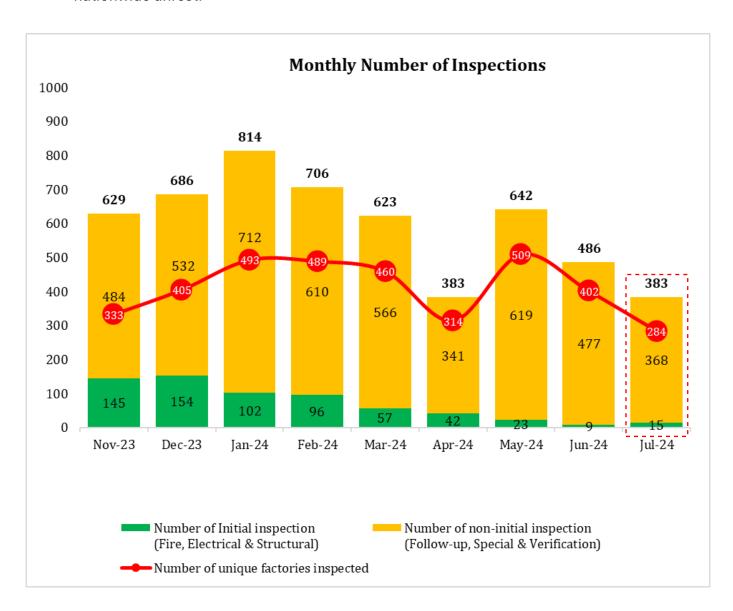


Figure 2: Number of Inspection conducted by the RSC



MONTHLY UPDATE ON SAFETY REMEDIATION

REMEDIATION PROGRESS ON INITIAL FINDINGS (As of July 2024)

- Out of 1805 covered factories, 585 received Letter of Recognition (LOR) for 100% completion of Initial findings).
- Complete remediation of CAP items by the factories (100% completion) is often slow because of the initial fire safety items (Fire Alarm and Detection System-FADS & Suppression System-SUPS) which is a challenge for the factories.
- To address this challenge, RSC updated the T&CVI² process that includes a logical sequence of activities with the allocation of responsibilities at each stage.

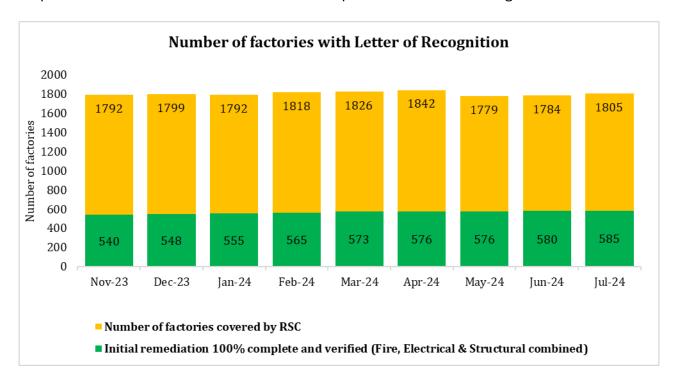


Figure 3: Number of Initial 100% remediate factories (combinedly recognized)

² T&C VI: Testing and Commissioning Verification Inspection



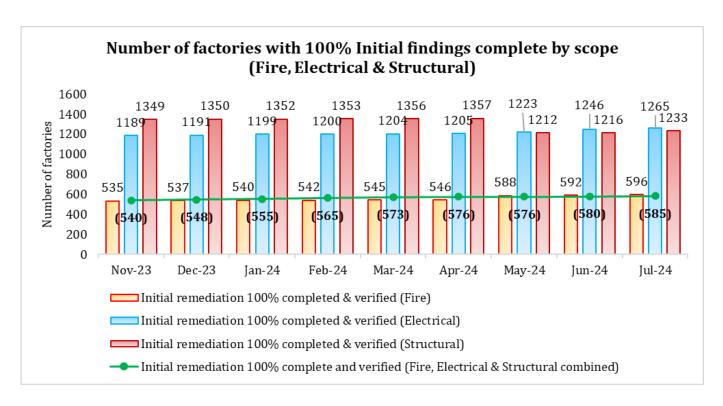


Figure 4: Number of Initial 100% remediate factories by scope (Fire, Electrical & Structural)



PROGRESS WITH REMEDIATION OF INITIAL FINDINGS (As of July 2024)

Progress with remediation is recorded following the three stages as mentioned below:

- **In progress**: This is the default status for an inspection finding. It means that remediation of the inspection finding is underway.
- **Pending verification**: The "Pending Verification" status refers to a process where a factory reports to RSC that the finding(s) is/are corrected but requires the RSC engineers' verification through an inspection.
- **Corrected**: The finding has been verified as 'corrected' by the RSC engineers through the follow-up verification inspection and/or testing visits.

The following graph shows the **735** factories that have recorded **100**% of initial findings completed (including Pending verification). Out of these factories, **585** have received the Letter of Recognition (LoRs) as shown in Figure 4.

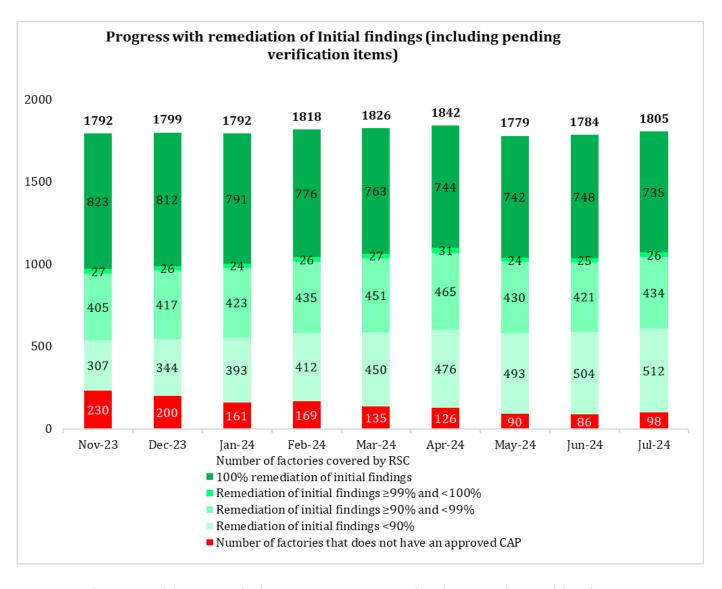


Figure 5: Initial remediation progress (%) considering pending verification



PROGRESS RATE ON MAJOR ITEMS BY DISCIPLINE

i. Remediation Status of Fire Alarm and Detection Systems (As of July 2024)

Figure **6** below demonstrates progress over the past **8** months with the three main stages for full testing and approvals of Fire Detection and Alarm Systems (FADS):

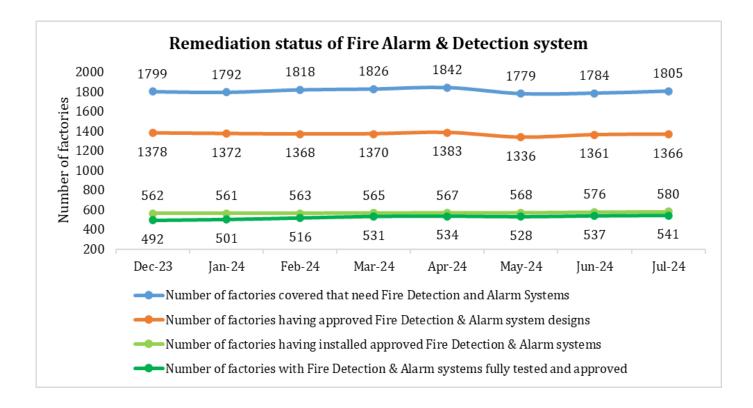


Figure 6: Remediation status of Fire Alarm and Detection System



Remediation Status of Fire Suppression Systems (As of July 2024)

Figure **7** below demonstrates progress over the past **8** months with the three main stages for full testing and approvals of Fire Suppression Systems (SUPS):

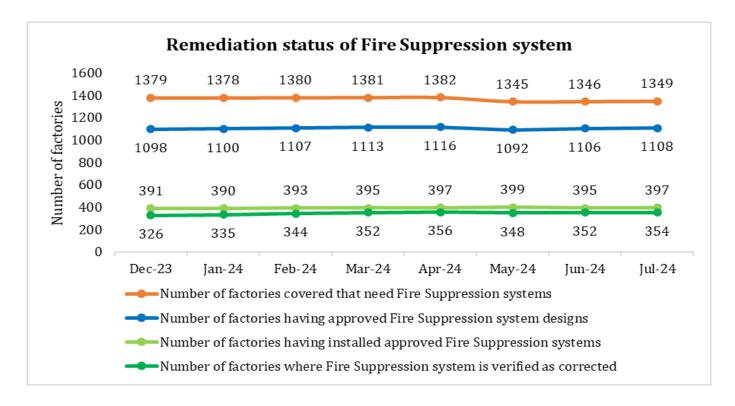


Figure 7: Remediation status of Fire Suppression System



Remediation Status of Structural Items: Detailed Engineering Assessment-(D) EA: (As of July 2024)

- Number of factories having accepted (D)EA: 1252.
- Number of factories that completed the structural remediation: 830.

The chart demonstrates the number of accepted (D)EAs, where there is a significant difference between desktop approval and the works on-site verified by RSC.

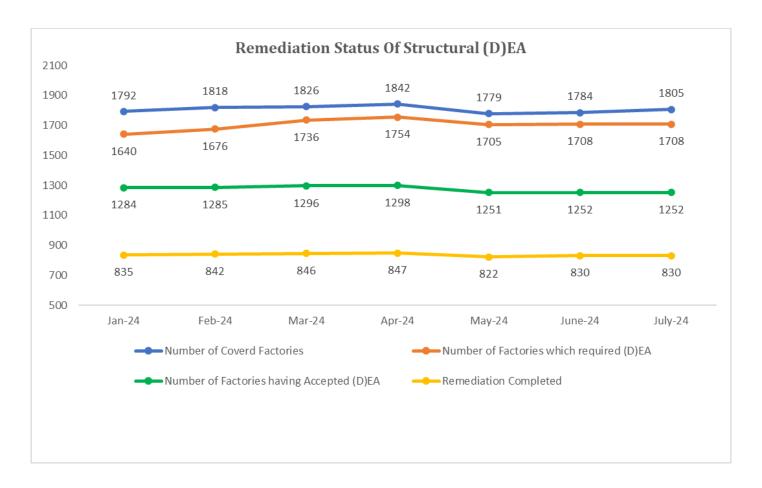


Figure 8: Remediation status of Structural (D)EA



MONTHLY UPDATE ON THE BOILER SAFETY PROGRAMME

As boiler safety is an integral part of the RSC's mandate, we are currently conducting safety assessments of the boilers at our covered factories. In July 2024, we conducted different types of boiler safety inspections at the factories. The following figure represents the data of our boiler safety inspections conducted in July.

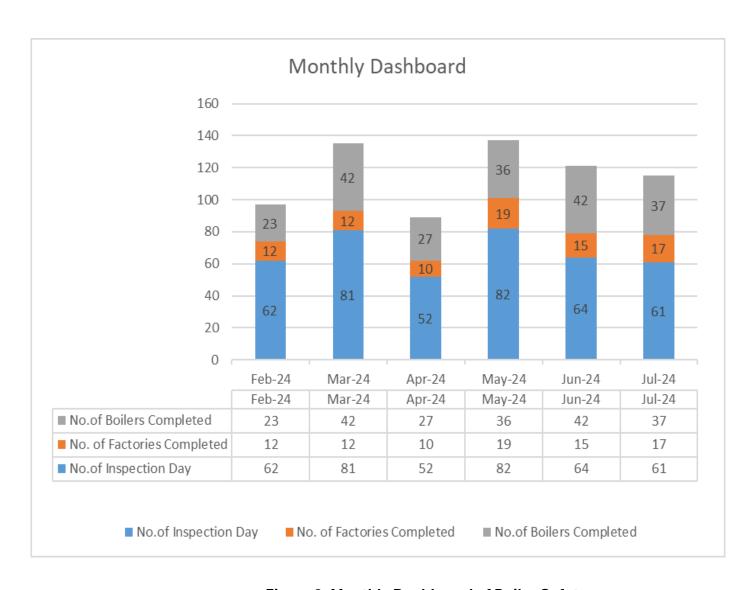


Figure 9: Monthly Dashboard of Boiler Safety



FACTORY ESCALATION STATUS (As of July 2024)

As of July 2024, **284** factories are in different stages of the escalation process, of which **195** are in Stage 1 and **89** are in Stage 2. It is to be noted that a total of **469** factories have been de-escalated after the escalation items were verified by the RSC up to this time. Out of the total RSC-covered factories, **1,052** have never gone through any escalation process. The percentage of different escalation stages of the RSC-covered factories (**1,805**) is shown in the pie chart below.

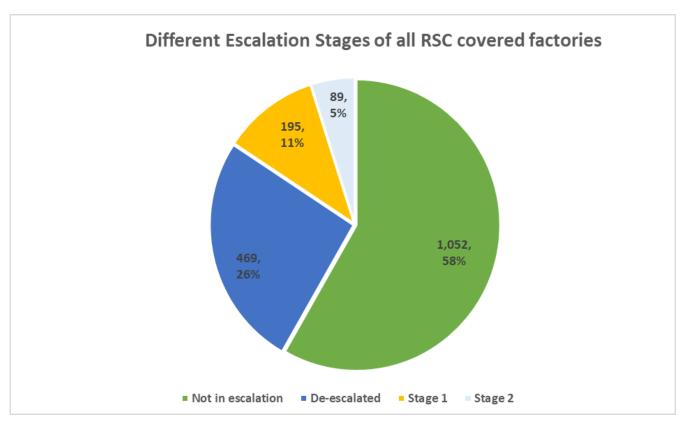


Figure 10: Escalation status of factories

LIST OF FACTORIES THAT RECEIVED STAGE 3 ESCALATION IN THE MONTH OF JULY 2024

The table below lists the name and account ID of the factory escalated to stage 3 in July 2024. This factory has been made ineligible for business with RSC-participating brands as a result of their failure to participate in the RSC-prescribed Safety Programme and has been transferred to DIFE.

Account ID	Account Name	Current Escalation Stage	Stage 3 Issued on
24539	Hong Kong Fashions Ltd (Extension)	STAGE 3	31 July 2024



LIST OF FACTORIES THAT RECEIVED RECOMMENDATION OF PARTIAL/FULL EVACUATION IN THE MONTH OF JULY 2024

During a structural assessment, or DEA review if RSC engineer(s) find an immediate threat to the occupant of the factory building, then RSC could recommend immediate partial/full evacuation for the factory building. In July 2024, the RSC didn't recommend partial or full evacuation to any of its covered factories.

REPORTED FACTORY INCIDENT(S) IN THE MONTH OF JULY 2024

When the RSC becomes aware of an incident in any RSC-covered factory, such as a fire or other accident that has caused death or injury or has potential safety implications for the occupants of the factory, a post-incident inspection is carried out immediately.

A report of such inspection is produced and shared with designated parties following the protocol. Any action(s)/recommendation mentioned in the report is/are implemented by the factory owner to ensure that adequate safety is re-established in the building.

However, one reported incident occurred at the RSC-covered factory in July 2024. The details are given below:

ACCOUNT ID	ACCOUNT NAME	DATE OF THE INCIDENT	INCIDENT SUMMARY
12462	Shrabony Knitwear Ltd.	18 July, 2024	A fire occurred in a single-storied fabric store shed (approximately 650 sqm) due to a suspected electrical short circuit. The exact reason is unclear. The RSC conducted the post-incident visit on 28 July 2024. During the visit, the RSC engineers found that the fire-affected store was not covered in the scope of the RSC-inspected factory.



MONTHLY UPDATE ON OCCUPATIONAL SAFETY AND HEALTH COMPLAINTS MECHANISM (July 1, 2024 – July 31, 2024)

Key Functions of the Occupational Safety and Health Complaints Mechanism

Workers at RSC-covered factories and their representatives have the right to lodge complaints at the RSC Safety and Health Complaints Mechanism remedial of any safety concerns that are not being effectively addressed at the factory level. They can raise concerns about safety and health risks without any fear and due confidentiality. The Safety and Health Complaints Mechanism also protects complainants from reprisal, harassment, threat, or other retaliatory actions for exercising the right to file a complaint. This protection applies regardless of whether the complaint is determined to be OSH (Occupational Safety & Health) or non-OSH. All complaints are assessed to determine if they fall under occupational safety and health safety.

RSC has recently launched the Comprehensive Complaints Mechanism (CCM) a NON-OSH pilot program, starting on March 11th, 2024, and concluding on August 11th, 2024. This initiative covers concerns such as Freedom of Association (FoA), child labour, forced labour, discrimination, minimum wages, benefits, leave, unfair employment contracts, separation, and environmental complaints. In this pilot, RSC has selected 100 brands and their 503 associated sourcing factories. The resolution protocol for Non-OSH Pilot (CCM) complaints mirrors that of OSH, However, if necessary, the protocol will be revised considering the pilot program observation, if required.

Occupational safety and health complaints and Non-OSH Pilot (CCM) covered complaints are processed by RSC staff specialized in investigating and resolving complaints. RSC complaint specialists are responsible for verifying the delivery of the remedy of all complaints. Where complaints affect the safety of all workers/groups of workers, the RSC announces the findings and remediation requirements to all workers at the factory.

Complaints that fall outside of the remit of the Occupational Safety and Health Complaint Mechanism and CCM (i.e., other non-OSH complaints) are forwarded to factory management, responsible brand, and labour signatories.

Complainants alleging issues at factories that are not covered by the RSC are provided with the contact information of the Department of Inspection for Factories and Establishments (DIFE).

Total Complaints Received (1 July 2024 – 31 July 2024)

The RSC received 88 complaints during the reporting period mentioned. Of these, 32 (36%) are Occupational Safety & Health (OSH) related complaints, and 56 (64%) are other non-OSH related complaints. There are 65 complaints recorded under the CCM pilot program by July 2024.



Monthly Update, Complaints Mechanism, RSC (July 2024)

Complaints Receiving Statistics						
Duration	OSH	Other NON- OSH	Total	OSH%	Other NON-OSH%	
Jul-24	32	56	88	36%	64%	
RSC Period	1697	5470	7167	24%	76%	
ACCORD Period	1190	1089	2279	52%	48%	
Total Period	2887	6559	9446			

Complaints Closing Statistics						
Duration OSH Other NON-OSH% OSH% Other NON-OSH%						
Jul-24	28	122	150	19%	81%	
RSC Period	1718	5477	7195	24%	76%	
ACCORD Period	1049	1050	2099	50%	50%	
Total Period	2767	6527	9294			

Complaints In-Progress/ Pending Statistics						
Duration	OSH	OSH%	Other NON-OSH%			
Jul-24	115	25	140	82%	18%	
RSC Period	115	25	140	82%	18%	
ACCORD Period	1	0	1	100%	0%	
Total Period	116					



Monthly Closing Status- OSH Complaints						
SL	SL Category Quantity					
1	Resolved	18				
2	Disengaged	1				
3	Not Sustained	5				
4	Withdrawn	3				
5	No Brand Factory	1				
	OSH 28					

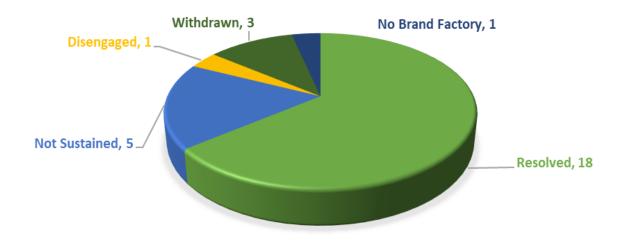


Figure 11: Monthly Closing Status of OSH Complaints

NB: OSH & NON-OSH data final status may vary based on assessment.

^{*} July - 24 (1 July - 31 July 2024), RSC period (1 June 2020 - 31 July 2024), Accord Period (1 August 2014 - 31 May 2020), Total period 1 August 2014 - 31 July 2024



Monthly Update, CCM Complaints- July 2024

CCM Complaints Statistics

Duration	Opening Balance	nce Received in July Total Open		Closed in July	Total Pending	
Jul-24	166	65	231	26	205	

Status of Closed CCM Complaints	Count
Resolved	22
Resolved outside RSC complaints mechanism	2
Not Sustained	1
Disengaged	1
Total	26

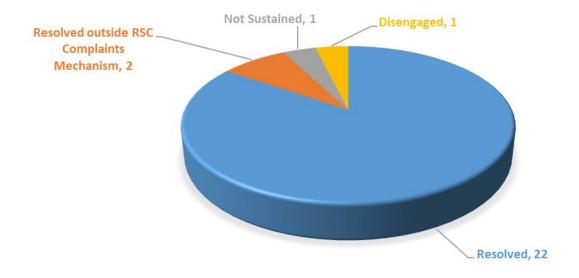


Figure 12: Monthly Closing Status of Non-OSH Pilot (CCM) Complaints



MONTHLY UPDATE OF OSH TRAINING PROGRAMME (As of July 2024)

Key Functions of the OSH Training Programme

Facilitation of Safety Training

- The RSC Safety Committee and Safety Training (SCST) Programme currently consists of 8 training modules conducted through 8 sessions for the members of the factory Safety Committee.
- As part of the training programme, the Safety Committee, and the RSC OSH Training Programme Specialist Conduct Walk Through (WT) (a type of inspection) at the factory to identify actual or any potential safety and health hazards.

All Employee Meetings

• Following a preliminary consultation (Initial Meeting) with the factory management, the RSC OSH Training department schedules 3 "All Employee Meetings (AEM)" at the factory grounds where all employees of the factory are invited to participate.

A factory receives a **Letter of Acknowledgement** (LoA) from RSC after participating in all the activities designed under the Safety Committee and Safety Training (SCST) Programme. The Safety Committee members conduct investigations immediately after any accidents/incidents take place at any factory.

	OSH Training Programme Monthly Report July -2024							
Sl Particular (Number of)		For July	As of 3					
		2024	Accord (Until 31st May 2020)	Work done by Accord & RSC	RSC Period			
1	Safety Committee Enrolled.	28	1,279	1,603	324			
2	OSH Training Session Conducted (1-8)	65	7,825	18,731	10,906			
3	Factories Completed OSH Training Full Cycle (Regular)	0	558	1,353	795			
4	Factories Completed OSH Training Full Cycle (Resumption)	8	0	809	809			
5	SC Member Participated in OSH Training	509	10,831	19,780	8,949			
6	Factories Covered Through All Employee Meetings	33	1,350	1,586	236			
7	Workers are reached through All Employee Meetings.	55,876	1,905,681	2,450,091	544,410			
8	Walk Through conducted	101	2,294	6,982	4,688			
9	Walk through Findings	651	13,047	38,061	25,014			
10	Safety Committee Meeting	60	634	3,307	2,673			
11	Factories received a Letter of Acknowledgement	0	530	1,238	708			

^{*} The number of SC members who participated in training module 1, to avoid repeated counting of the SC members.

^{**} Number of factories where at least one AEM is conducted.

^{***} Maximum number of workers participated in at least one of the 3 AEMs.



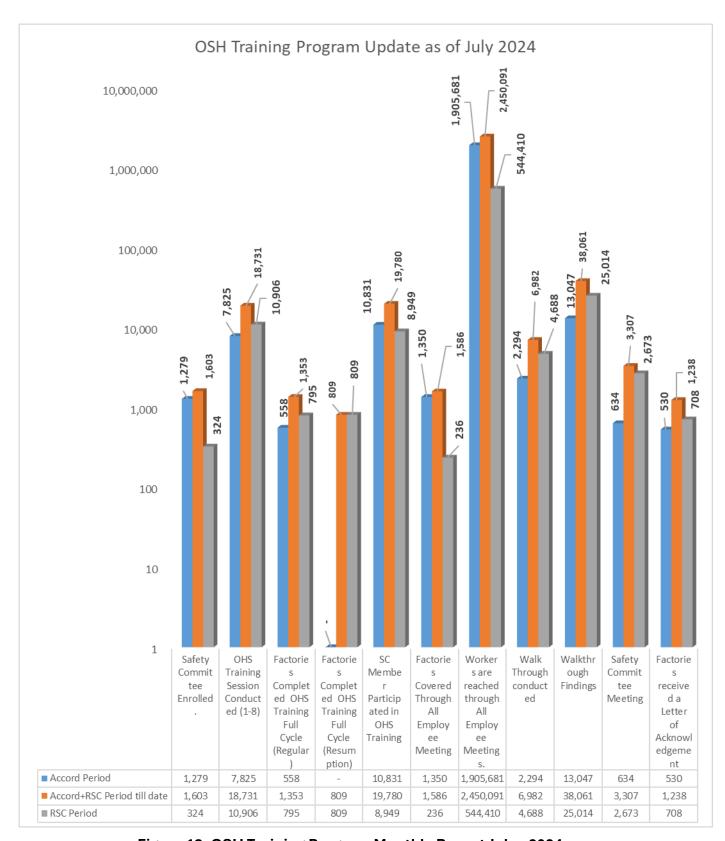


Figure 13: OSH Training Program Monthly Report July - 2024