

A close-up photograph of a woman with dark hair, wearing a white headscarf and a blue sari with a white checkered border. She is looking directly at the camera with a neutral expression. She is operating a sewing machine, with her hands visible on the machine's controls. The background is slightly blurred, showing what appears to be a factory or workshop setting.

RMG SUSTAINABILITY COUNCIL (RSC)

QUARTERLY AGGREGATE REPORT 4.2

On Remediation Progress and Status
of Workplace Programmes at RMG
Factories Covered by the RSC

Period: September 2023 to November 2023

Delivering world-class sustainable workplace safety programmes

CONTACT US

We value your feedback on this document.

Email: contact@rsc-bd.org

Phone: + 88 02 226603540-3

Web: www.rsc-bd.org

LinkedIn: <https://www.linkedin.com/company/rmg-sustainability-council/>

Our Office Address:

Level-5, Shanta Forum East Tower, 187, 188/B, Bir Uttam Shawkat Sarak, Tejgaon, Dhaka-1208, Bangladesh.

Cover Photo: An image of a worker at a RSC covered factory.

RSC at a glance

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 Bangladesh Accord were transitioned to the RSC. Our vision is to ensure workplace safety, enabling sustainable business and developing the supply chain. Our expertise lies in:

- Fire, Electrical, Structural and Boiler associated hazards identification in accordance with 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 follow up on their right to a safe workplace. Going forward we will also have a wing where environmental sustainability will be monitored and assessed.

EXECUTIVE SUMMARY

The Ready-Made Garments Sustainability Council (RSC) is an unprecedented tripartite initiative to carry forward the significant accomplishments made on workplace safety in Bangladesh. It is committed to transparency and public accountability. As part of commitment, the RSC publishes Quarterly Aggregate Reports (QAR) with information on the progress of the implementation of remedial measures in the RMG factories. The QAR shows that factories are continuing to make progress in remediation. During the reporting period, 216 factory-Corrective Actions Plans (CAPs) have been developed and approved. Till date, a total of 1660 factory- CAPs have been in the purview of RSC.

The reporting period for this QAR is September 2023 to November 2023.

The RSC is currently covering 1,792 factories in Bangladesh. There are around 877 factories designated as CAP behind schedule due to the slow progress rate. The RSC is actively working with the factories to address those specific CAP items for completion.

In this reporting period, the RSC issued a Letter of Recognition (LoR) to 27 factories. As of November 2023, the total number of factories issued LoRs stands at 540 since the inception of the programme. To ensure that factories are safe it is imperative that the remaining remediation is completed to include all initial findings.

KEY MILESTONES

Inspections (September 23 – November 23)

1. A total of **27** factories from all category inspections were issued with the Letter of Recognition (LoR) in this quarter (**18** in September 2023, **4** in October 2023 and **5** in November 2023).
2. **1,495** inspections were performed in **679** factories in this reporting period.
3. **132** factories were listed and scheduled for initial inspection.

Engineering (As of November 2023)

1. **65.91%** of required (D)EA documentations were accepted through on-site verification.
2. **830** factories have completed structural retrofitting required remedial works based on approved (D)EAs.
3. **42.65%** Electrical SLDs reviews were accepted.
4. **86.14%** covered factories received FADS design approval.
5. **84.94%** covered factories received SUPS design approval.
6. **483** covered factories have their fire alarm and detection system verified as installed to standard.
7. **323** covered factories have their fire suppression system verified as fully functional and installed to standard.

Remediation

1. **79.0%** RSC covered factories have their initial remediation progress rate above **90%**.
2. **429** factories were De-escalated, **222** factories were escalated to Stage 1, **109** factories were escalated to Stage 2, and **4** factories were escalated to Stage 3.

OSH Training programme

1,231 factories have completed all 8 training sessions.

Occupational Safety & Health Complaint Mechanism (OSHCM)

5,744 new complaints were received as of November 2023.

Factory Coverage

- Covered factory account number: **1,792**. (The drop from 1,880 covered factories to 1,792 in November is the outcome after the delisting, archiving, closing and ineligibility).
- The number of factories awaiting initial assessments increased substantially in the months of April 2023, June 2023 & July 2023 when many factory extension buildings were listed as new accounts. As of November 2023, a total of 132 factories were waiting for an initial inspection.

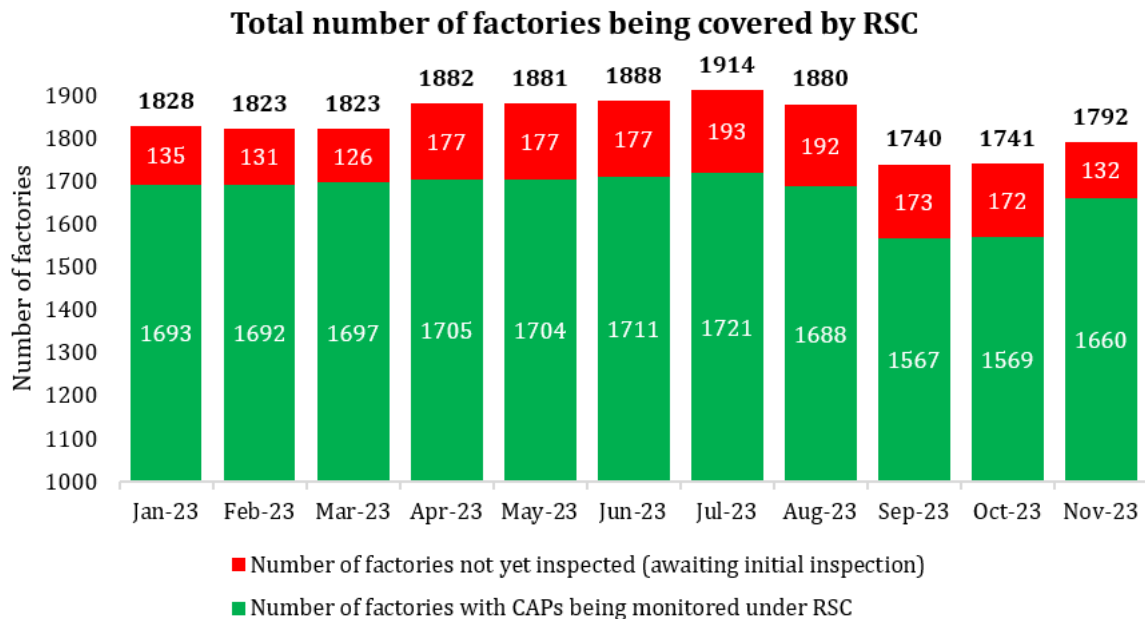


Figure 1: Number of factories covered by the RSC

RSC covers **1,792** factories with the status as noted below.

- **1,581** factories are **'active'**, meaning that at least one Accord signatory company is actively sourcing from there.
- **68** factories are **'inactive responsible'**, meaning that at least one Accord signatory company signatory was sourcing from there within the last 18 months.
- **91** factories are **'no-brand'**, meaning that they were covered under the 2013 Accord but had not completed the initial remediation until 1 June 2018, and have not been listed as 'active' by international ACCORD. These factories are now relisted as "Independent Factories" by the BGMEA/BKMEA, therefore, the RSC continues to monitor and support remediation at these factories until remediation has been completed.
- **52** factories are **'pending closure'**, meaning that they are undergoing the RSC closure procedure. This procedure is initiated when a factory has/is going to be temporarily closed, permanently closed, or relocated.

1. INSPECTIONS

After each factory is inspected for structural, electrical, fire & life safety and boiler safety, the inspection reports are shared with factory owners/concerns, the responsible signatory companies (Brands), and worker representatives. The factory owner/concerns and the brands are tasked to prepare a response to the CAP that details what remedial actions will be taken with a clear timeline and a financial plan. The RSC team of remediation program officers provide support in CAP development and implementation and work closely with the RSC engineers to provide any necessary technical guidance. Once a CAP is finalized by the factory owners/concerns and the Brands, it is submitted for review and approval. All 4 inspection reports and the CAPs are uploaded to the database [jointly shared by the Accord and the RSC] and are made publicly available on the [RSC website](#).

- Total number of inspections: **1,495** in current quarter.
- Number of unique factories inspected: **679** in current quarter.
- The total inspection number is **2.2** times than the number of unique factories covered indicating multiple types of inspections being conducted simultaneously.

Monthly Number of Inspections

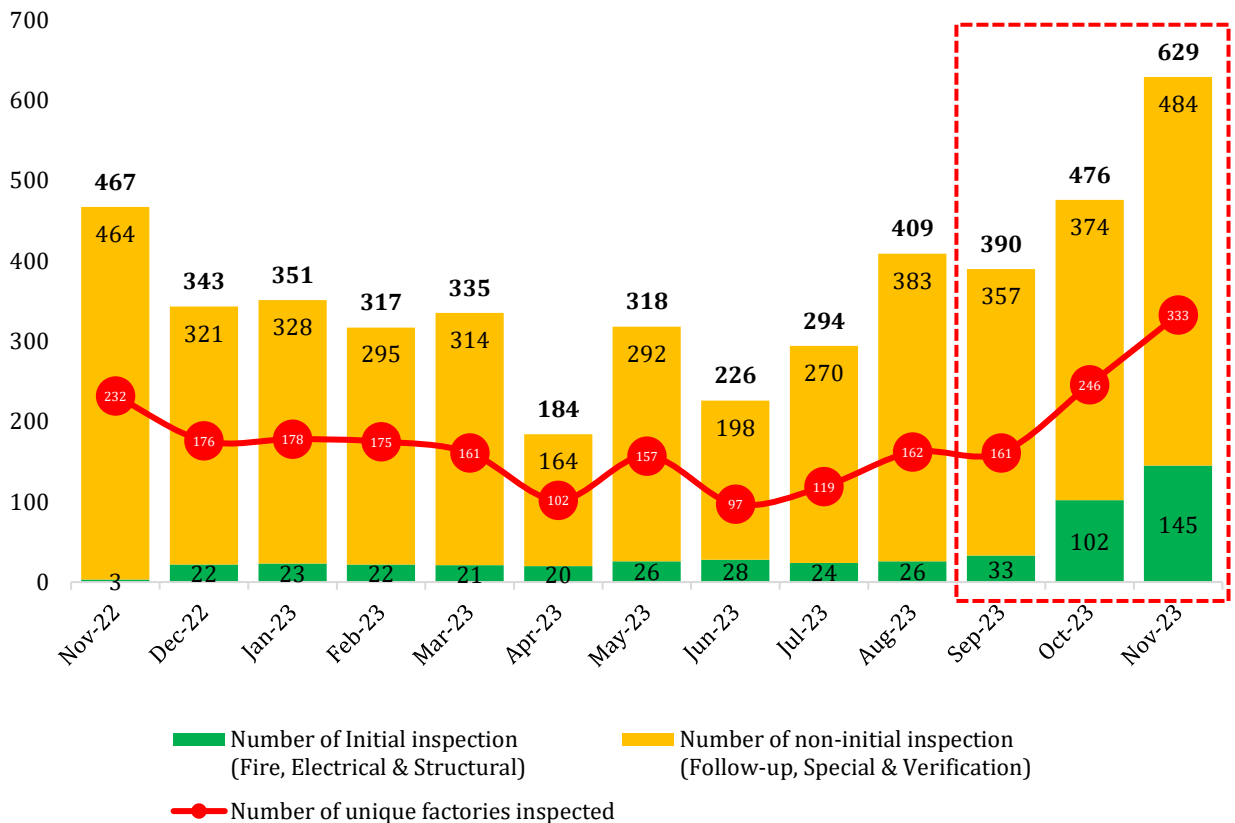


Figure 2: Number of Inspection conducted by the RSC

More detailed breakdown of inspections conducted during the period of September to November 2023

Types of inspections	September 2023 to November 2023
Initial Inspections (all scopes)	280
FUIs Electrical	463
FUIs Fire	198
FUIs Structural	204
Article 17	0
Boiler Pilot	0
Escalation	4
Factory Remediation Fund	1
Immediate Concern	1
Negative Suction	0
Post Incident (all scopes)	9
Safety Complaint	6
SCWT Finding	0
Settlements	0
Specific Issue	0
Closure	29
DEA	58
Pre-T&CVI Review	95
T&CVI	84
T&CVI Final Verification	63
Total Inspection Conducted	1,495

Table 1 inspections conducted from September 2023 to 30 November 2023

2. REMEDIATION

2.1. REMEDIATION PROGRESS ON INITIAL FINDINGS (As of November 2023)

- Total number of factories with Letters of Recognition (for 100% completion of Initial Findings): **540**.
- The number of 100% recognitions is limited by slow completion of initial Fire safety (Fire Alarm and Detection System-FADS & Suppression System-SUPS) items, which still present a key challenge. To address this challenge, the T&CVI process has been updated with a logical sequence of activities followed in the T&CVI process and there are responsible people allocated at each stage of the process.

Number of factories with Letter of Recognition for 100% initial findings complete

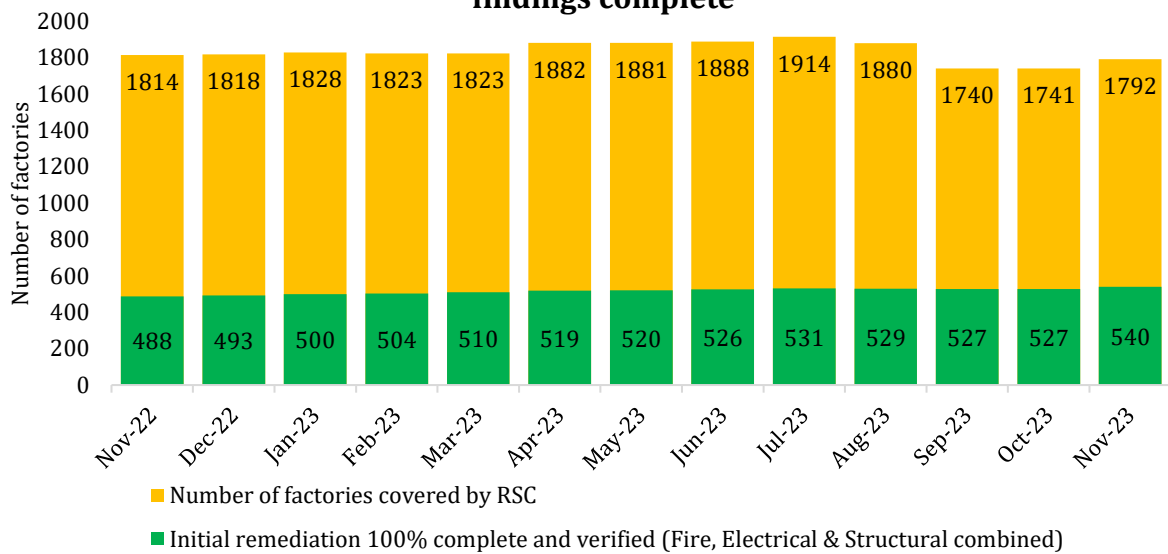


Figure 3: Number of Initial 100% remediated factories (combinedly recognized)

Number of factories with 100% Initial findings complete by scope (Fire, Electrical & Structural)

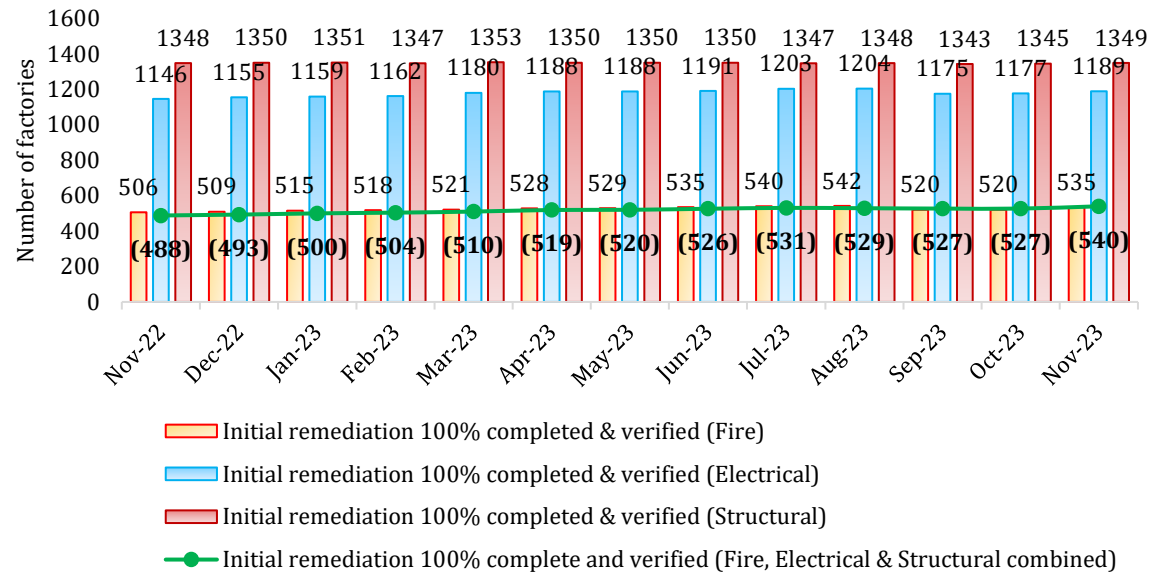


Figure 4: Number of Initial 100% remediated factories by scope (Fire, Electrical & Structural)

2.2. PROGRESS WITH REMEDIATION OF INITIAL FINDINGS (AS OF NOVEMBER 2023)

Progress with remediation is recorded as being at one of the following three stages:

- 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 corrected but requires the RSC engineer’s verification through an inspection.
- Corrected:** The finding has been verified as corrected by the RSC engineers through their follow-up verification inspection and/or testing visits.

The following graph shows the 823 factories that have recorded 100% initial findings completed (includes Pending verification). From Figure 4 above it can be seen that 540 of these factories have received a Letter of Recognition as having 100% initial findings verified (Corrected) by inspection.

Progress with remediation of Initial findings (including pending verification items)

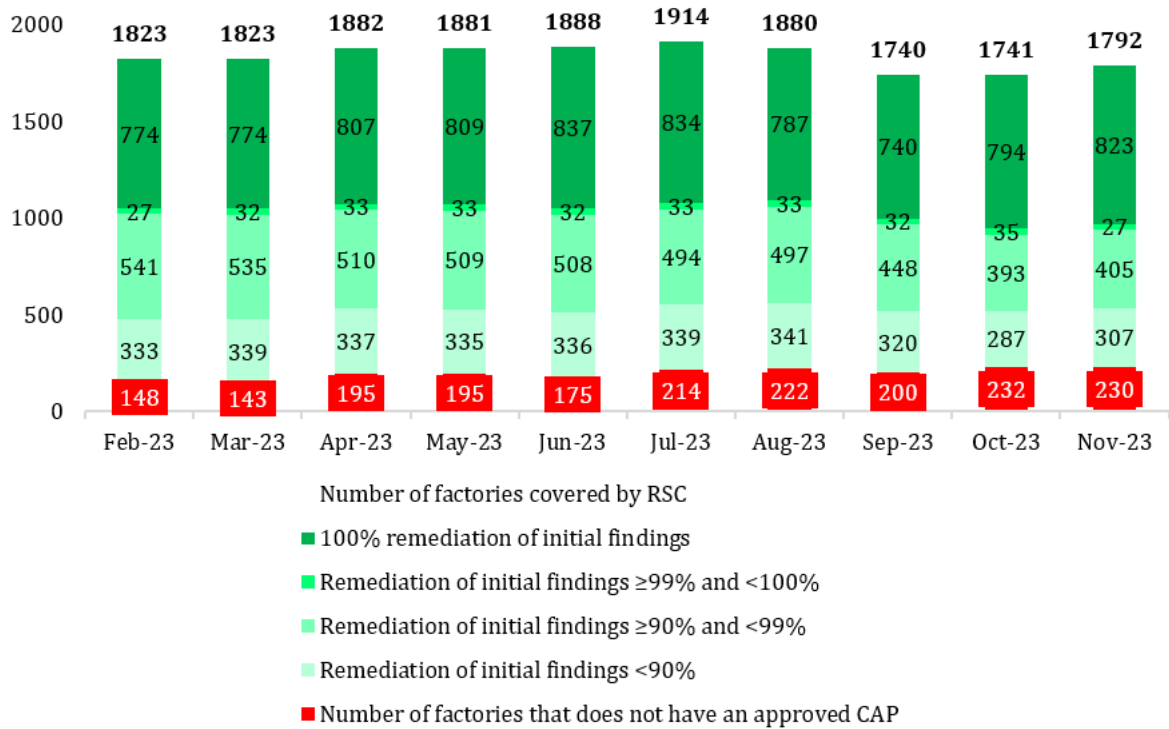


Figure 5: Initial remediation progress (%) considering pending verification items

2.3. FACTORY REMEDIATION FUND

To support factories that no longer have a brand signatory company as a customer to support them, a Factory Remediation Fund (FRF) was set up in 2017. In July 2019, the fund became available to all covered factories meeting certain criteria. The funds have been exhausted and is closed for new applications.

The funds made available through the FRF were distributed in several instalments, subject to factory cooperation, proof of payment towards remediation works and verified completion of the remediation commensurate with each preceding instalment. Inspections to verify remediation completion under the terms of the Accord Remediation Fund agreements are conducted by the RSC. Applications for FRF from 20 factories were approved¹.

During the reporting period, 1 inspection was conducted in this Quater to verify that the factory remediation was completed as per the provided funds.

¹ <https://bangladeshaccord.org/updates/2020/08/20/overview-of-the-factory-remediation-fund-closed-on-31st-may-2020>

2.4. FACTORY ESCALATIONS

The escalation process involves three stages for non-compliant factories, leading to termination of business relationships in Stage 3. As of November 2023, 429 factories were de-escalated, 222 were in Stage 1, and 109 were in Stage 2. There were 4 factories escalated to Stage 3.

As of November 2023, a total of **331** factories have been escalated: **222** to Stage 1 and **109** to Stage 2. There are **429** factories that were de-escalated after the escalation items were verified by the RSC. Out of the total RSC covered factories, **1,032** have never gone to the escalation process. The percentage of different escalation stages of the RSC covered (**1,792**) factories are shown in the pie chart below.

Different Escalation Stages of all RSC covered factories

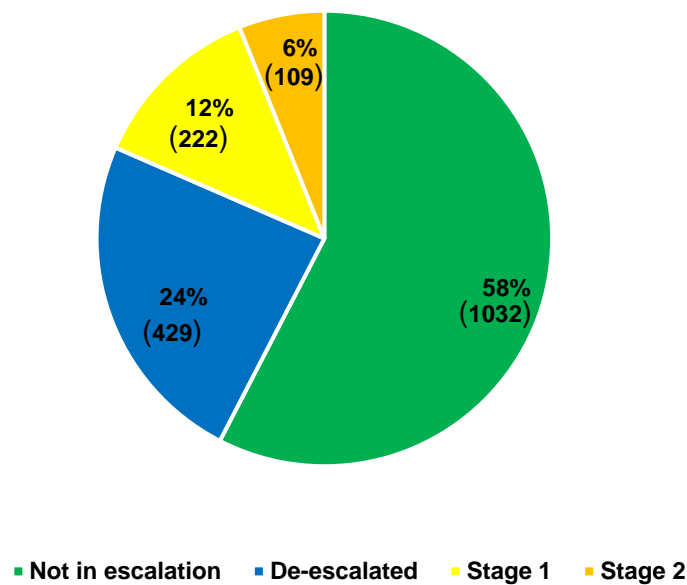


Figure 6: Escalation status of factories

2.5. LIST OF FACTORIES THAT RECEIVED STAGE 3 ESCALATION IN THIS QUARTER

From 1 September until 30 November 2023 there were 4 factories escalated to Stage 3.

The table below lists the names and account IDs of those factories, which were made ineligible for business with RSC participating Brands as a result of failure to participate in the RSC prescribed Safety Programme and have been transferred to DIFE.

ACCOUNT ID	ACCOUNT NAME	CURRENT ESCALATION STAGE	STAGE 3 ISSUED ON
10831	Susuka Knit Ltd.	Stage 3	19 Sep 2023
10494	Caesar Apparels (Extension)	Stage 3	18 Oct 2023
10073	Crystal Composite Ltd.	Stage 3	27 Nov 2023
24146	A&A Travelling Goods Bangladesh Ltd.	Stage 3	28 Nov 2023

2.6. FACTORIES THAT RECEIVED RECOMMENDATION FOR EVACUATION THIS QUARTER

Factory buildings are required to (temporarily) evacuate if the initial or follow-up inspections revealed a severe and imminent life safety risk due to structural failure or severe electrical and fire hazards. During a structural assessment, if the RSC engineer(s) find an immediate threat to the life safety of any occupant of a factory building, then RSC can recommend immediate full or partial evacuation of the building.

In the month of November 2023, the RSC didn't recommend partial or Full evacuation to any of its covered factories.

2.7. REPORTED FACTORY INCIDENT(S) IN THIS QUARTER

Where the RSC becomes aware of an incident in an 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, then an incident inspection is carried out immediately to investigate.

A report of the incident is produced, and actions identified that the factory owner must implement to ensure an adequate level of safety is re-established in the building. There were **three** such cases during September to November 2023:

ACCOUNT ID	ACCOUNT NAME	DATE OF THE INCIDENT	INCIDENT SUMMARY
12252	ABM Fashion Ltd.	30 October, 2023	A fire incident at the factory on 30 October 2023 was reported through a media outlet. A loud explosion followed by a fire incident reportedly took place. at ABM Fashion Ltd., (Location: 1143 & 1145, Konabari, Kashimpur road, Gazipur. on Monday (October 30) at around 05:35pm. Upon receiving the news, the RSC immediately dispatched a team of engineers to conduct the post-incident inspection at this factory.
11219	Fortis Garments Ltd.	31 October, 2023	A fire incident at the factory on 31 October 2023 was reported through a media outlet. A loud explosion followed by a fire incident reportedly took place. At Fortis Garments Ltd. Location: Holding No-100/1, Block-B, Saheed Mosarraf Hossain Road, Purba Chandra, Sofipur, Kaliakoir, Gazipur. on Tuesday (October 31) at around 01:30 pm Upon receiving the news, the RSC immediately dispatched a team of engineers to conduct the post-incident inspection at this factory.
23528	ECHOTEX Ltd. (New Building)	30 October, 2023	A fire incident at the factory on 30 October 2023 was reported through a media outlet. A loud explosion followed by. (New Building) Location: Chandra, Palli Biddut, Kaliakoir. on Monday (October 30) at around 07:56 pm a fire incident reportedly took place. At ECHOTEX Ltd. (New Building) Location: Chandra, Palli Biddut, Kaliakoir. on Monday (October 30) at around 12:23 pm Upon receiving the news, the RSC immediately dispatched a team of engineers to conduct the post-incident inspection at this factory.

3. STRUCTURAL SAFETY

Based on the initial structural inspection of a factory building, remedial recommendations are provided, among which may be a requirement for a further Detailed Engineering Assessment (DEA) or simpler Engineering Assessment (EA) to ensure an adequate level of safety

If the initial inspection indicates potential structural weakness, factories are required to undertake a structural (Detailed) Engineering Assessment {(D)EA}, including as-built drawings, engineering test reports, preparing load plans, and developing retrofitting drawings. (D)EAs are conducted by structural engineers or consultants hired by factories and submitted to the RSC for review.

3.1. FACTORIES REQUIRING (DETAILED) ENGINEERING ASSESSMENTS (D)EAs

The DEA or EA done by the factory’s consultant is submitted to RSC for approval. RSC engineers review submitted documentation in order to determine if the designs of the proposed remedial works are compliant with associated legislation and standards. Once the design is approved as compliant with appropriate legislation and standards, written confirmation is provided on the acceptance of the design prior to the commencement of the remedial works.

Once the (D)EAs are accepted, the factories are required to complete the structural remediation works in accordance with the approved design.

For the reporting period, 65.91% of required (D)EA documentation was fully accepted through on-site verification up to 30 November 2023.

(D)EA Status as of 30 November 2023	
Factories that require a (D)EA	1,578
Pending submission by factory	222
Submitted, pending review	54
Partially accepted, pending partial re-submission	191
Reviewed, accepted, and pending on-site verification	69
Accepted i.e., on-site verification revealed alignment between (D)EA documentation and the physical building(s)	1,040

Table 2 Overall (D)EA status up to 30 November 2023

3.2. REMEDIATION STATUS OF DETAILED ENGINEERING ASSESSMENT-(D)EAs

The chart demonstrates the number of accepted (D)EAs, where it can be seen that there is a significant difference between desktop approval and the works onsite as verified by RSC.

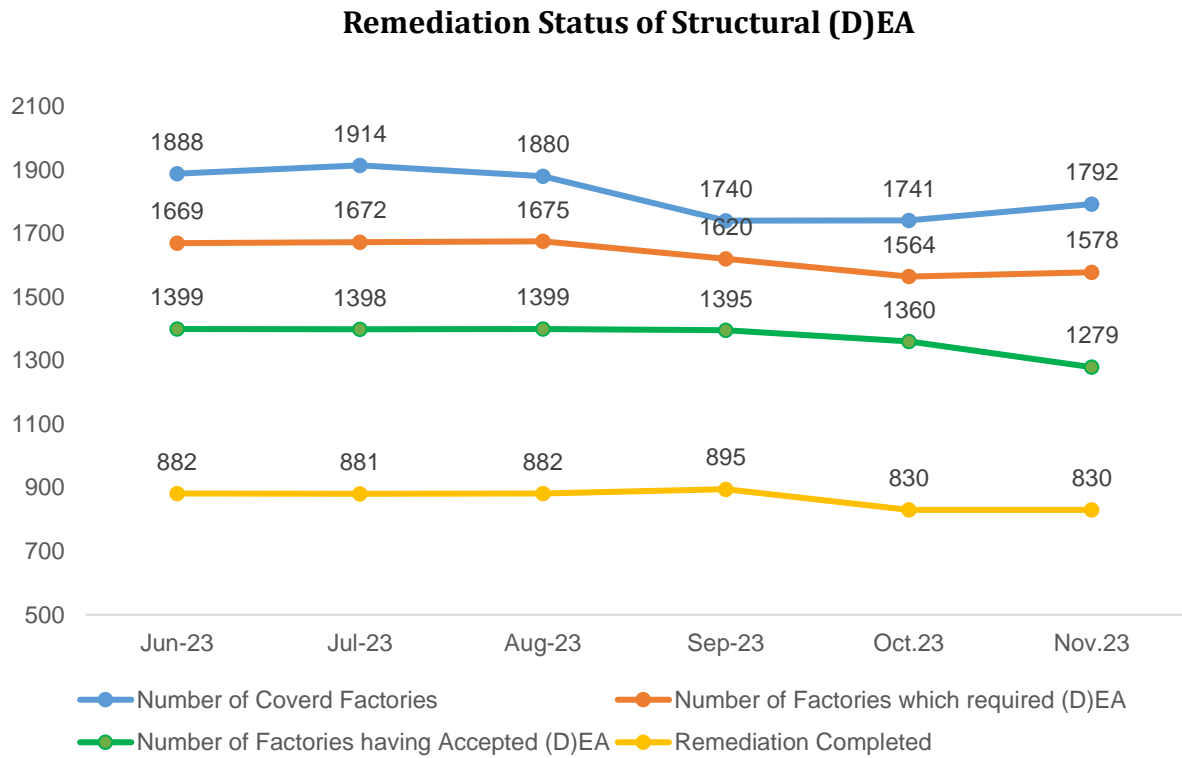


Figure 7: Remediation status of Structural DE/EA

3.3. OTHER COMMON STRUCTURAL FINDINGS AND REMEDIATION PROGRESS

Findings	No. of factories where the finding was identified	No. of factories where the finding is still outstanding	Remediation Progress rate
Lack of management load plan	637	14	97%
Inconsistency with building plan and drawings	66	2	97%
Incorrect implementation of existing load management plan	607	17	97%
Lack of design check against lateral load	495	32	94%

Table 3 Status of most common structural findings at covered factories up to 30 November 2023

4. ELECTRICAL SAFETY

The initial assessment reports developed from fire and electrical inspections, which are scheduled on the same day.

Design Approvals and Technical Support

The RSC engineers review submitted designs and any other relevant information and are dealt with by RSC in the same way as described for structures above. Design reviews need to be carried out generally for the Single Line Diagrams (SLD) showing the full distribution of the electrical installations.

SLD status as of 30 November 2023	
Number of factories that require an SLD	1505
Number of pending submissions by factory	226
Submitted SLDs, pending review	6
Reviewed SLDs, accepted and pending on-site verification	690
Fully accepted i.e., on-site verification revealed alignment between SLD documentation and the installed layout	583

Table 4 Overall SLD status up to 30 November 2023

4.1. STATUS OF MOST COMMON ELECTRICAL FINDINGS AND REMEDIATION PROGRES

Findings	No. of factories where the finding was identified	No. of factories where the finding is still outstanding	Remediation Progress rate
Lack of cable support and protection	1400	164	88%
Lack of Lightning Protection System (LPS)	1412	260	82%
No Single Line Diagram (SLD)	611	132	79%
Inadequate circuit breakers	373	19	95%
Hazardous accumulation of dust and lint on electrical equipment	0	0	0
Unsafe earthing equipment	402	10	98%

Table 5 Status of most common Electrical findings up to 30 November 2023

5. FIRE AND LIFE SAFETY

5.1. DESIGN APPROVALS AND TECHNICAL SUPPORT

Design reviews need to be carried out for the following:

- Designs, Calculations, Specifications and drawings of the Automatic Fire Detection and Alarm system and their interfaces (eg. doors with magnetic hold-open devices)
- Designs, Calculations, Specifications, Listed Components and drawings of the Fire Suppression Systems (e.g. sprinklers, standpipes, hydrants, hose reels)

5.2. INSTALLATION OF AUTOMATIC FIRE DETECTION AND ALARM SYSTEMS

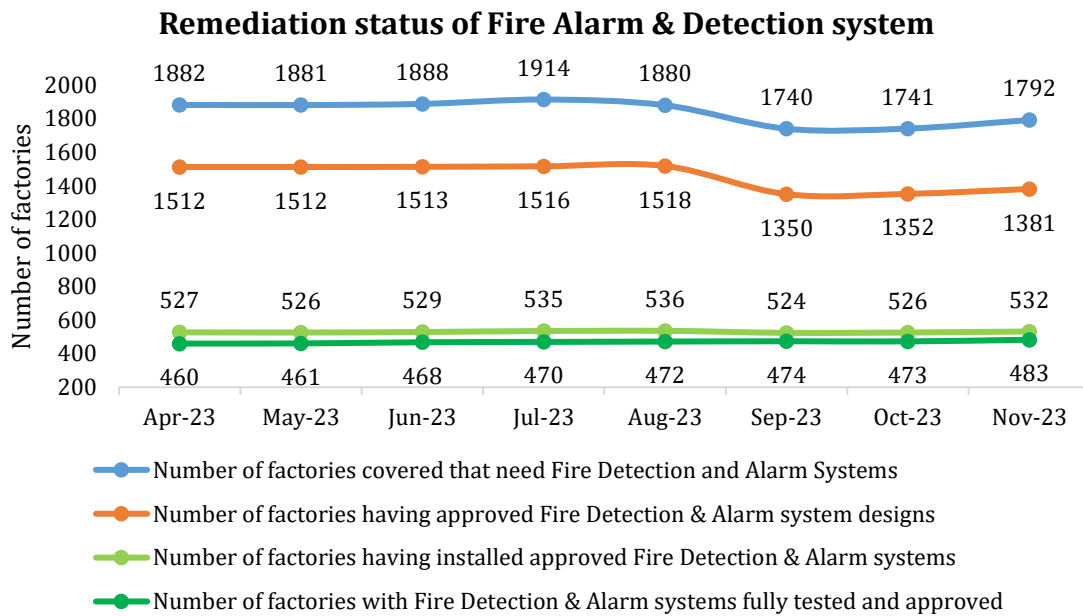


Figure 8: Remediation status of Fire Alarm and Detection System

5.3. INSTALLATION OF FIRE SUPPRESSION SYSTEMS

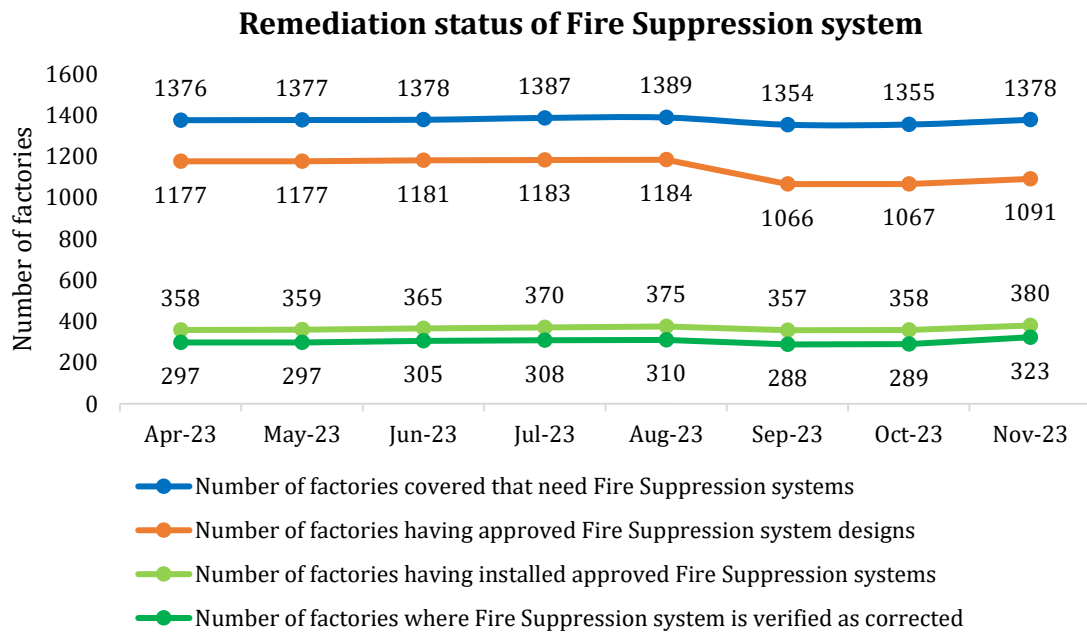


Figure 9: Remediation status of Fire Suppression System

5.4. OTHER COMMON FIRE SAFETY FINDINGS AND REMEDIATION PROGRESS

Status of most common Fire findings other than FADS and SUPS systems, at covered factories and Remediation Progress rate:

Findings	No. of factories where the finding was identified	No. of factories where the finding is still outstanding	Remediation progress rate
Lockable/collapsible gates	499	4	99%
Inadequate egress lighting	539	14	97%
Lack of fire separation in hazardous areas	500	25	95%
Non-compliant exit stair openings	554	55	90%
Storage in means of egress	489	10	98%

Table 6 Status of most common fire findings up to 30 November 2023

6. BOILER SAFETY

As Boiler safety is an integral part of the RSC’s mandate to cover inspection and remediation programme, and our covered factories are going through the due inspection process. From September to November 2023, RSC conducted different types of boiler safety inspections of 2565 boilers in RSC covered factories. These inspections included preliminary visual checks, such as internal and pressure tests (Day 1), and functional tests (Day 2). Out of those, a small percentage of boilers required repeat Day 1 tests. Out of the inspected boilers during the reporting time, a total of 56 boilers successfully completed the full testing regimen, thus ensured required safety compliance."

Progress made during this reporting period is represented below:

Status of Boiler inspections	No. of Boilers in factories with 1 single boiler	No. of Boilers in factories with 2 boilers	No. of Boilers in factories with 3 or more boilers
Total number of boilers	689	810	1066
No. of boilers undergone Preliminary Visual inspection (From Sep'23 to Nov'23)	7	4	3
No. of boilers undergone Day 1 Internal & Pressure test (From Sep'23 to Nov'23)	2	46	26
No. of boilers needing repeat Day 1 Internal & Pressure test (From Sep'23 to Nov'23)	1	3	2
No. of boilers undergone the Day 2 functional test (From Sep'23 to Nov'23)	7	29	20
No. of boilers successfully completed full Day 1 & 2 tests (From Sep'23 to Nov'23)	7	29	20
% Boilers fully tested for safety (From Sep'23 to Nov'23)	1.02	3.58	1.88

Table 7 Status of boiler tests at covered factories September to November 2023

7. OSH TRAINING PROGRAMME

Safety Committees play a role in hazard identification and accident prevention. The Safety Committee and Safety Training Programme conduct one initial meeting and an 8-session training for each factories.

As of November 2023, a total of 1231 factories have successfully completed the entire training programme, with an additional 107 factories awaiting receiving the Letter of Acknowledgement (LoA). A total of 6,136 Safety Committee Walk Through (SCWT) sessions have been conducted since the inception of the programme.

Quarterly Data For RSC OSH Training Programme

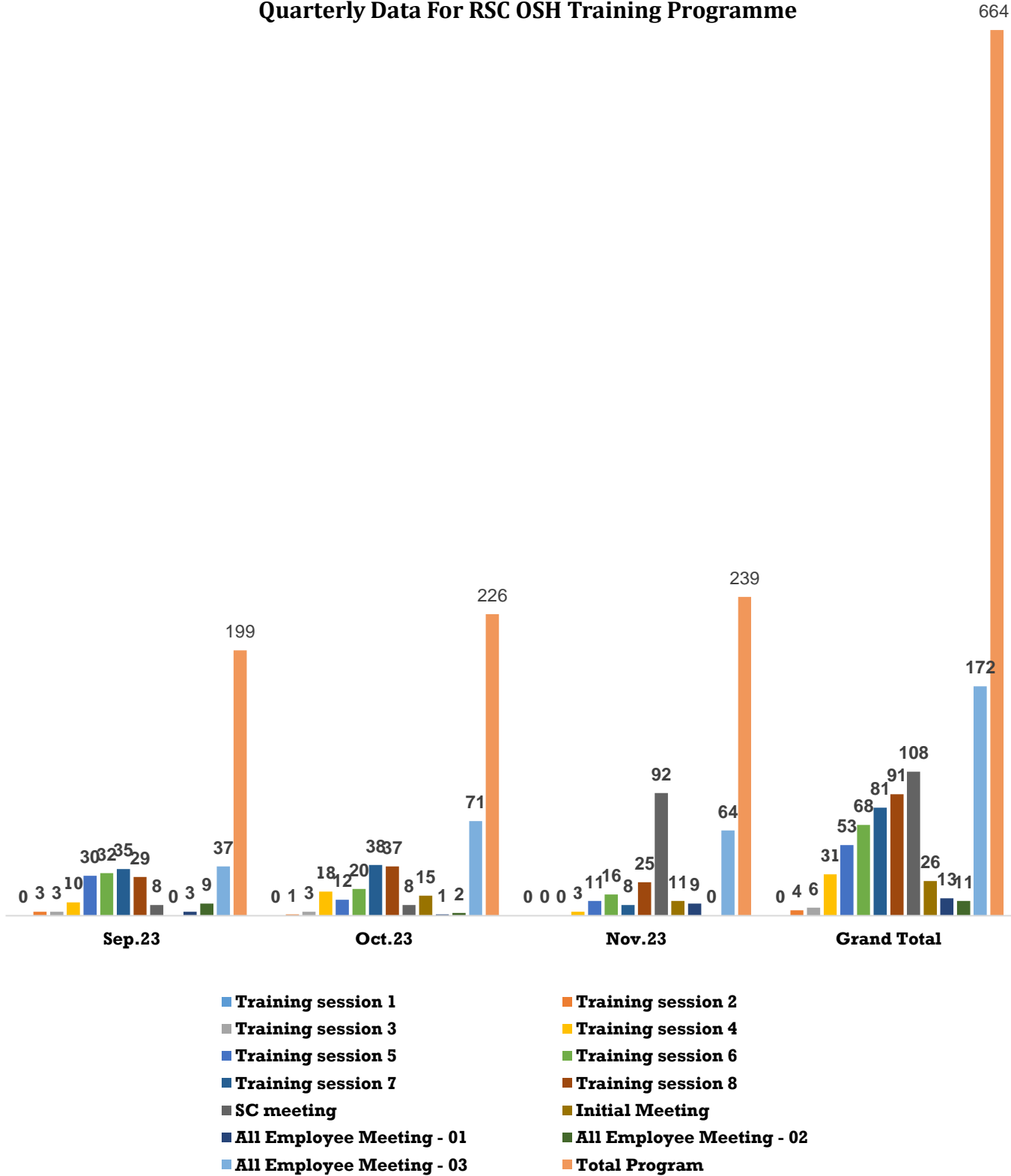


Figure 10: OSH Training Programme Update from 1 September 2023 to 30 November 2023

8. OCCUPATIONAL SAFETY & HEALTH COMPLAINTS MECHANISM (OSHCM)

Since June 2020, the RSC has managed the Complaints Mechanism, ensuring workers' safety concerns are addressed confidentially.

The RSC investigates complaints, collaborates with complainants and Factory Management for effective implementation, and can take measures, including termination of business relationships if progress is not made.

Since June 2020, the RSC has received 5,744 complaints out of which 1,397 (24.32%) are Occupational Safety & Health (OSH) related complaints and 4,347 (75.68%) are non-OSH related complaints.

Recent data shows an upward trend in new complaints and OSH-related concerns.

Complaints Receiving Statistics According To RSC-Year

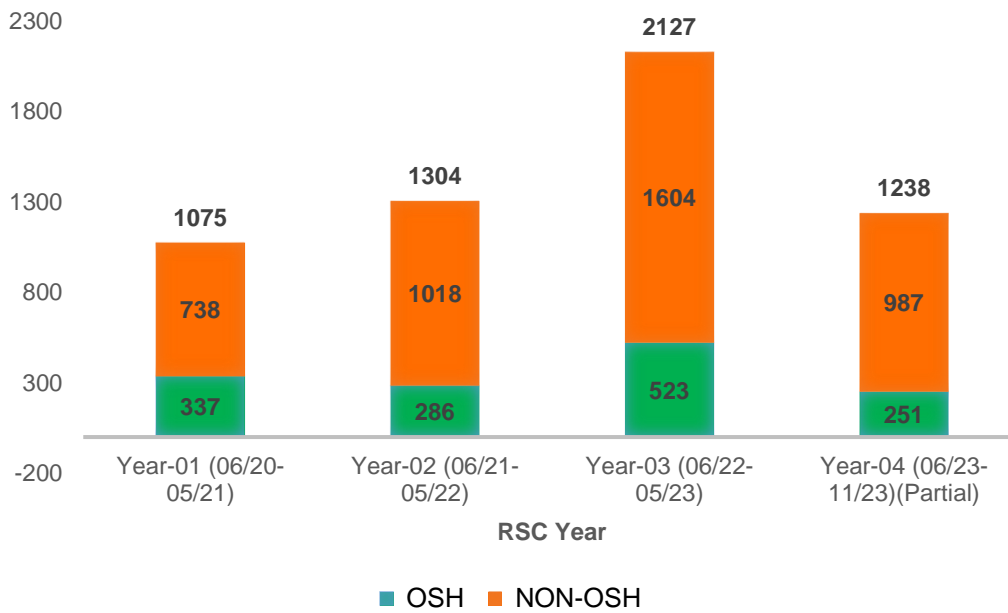


Figure 11: Complaints Mechanism accumulated data update as of 30 November 2023.

Complaints Closed/Forwarded Statistics According To RSC-Year

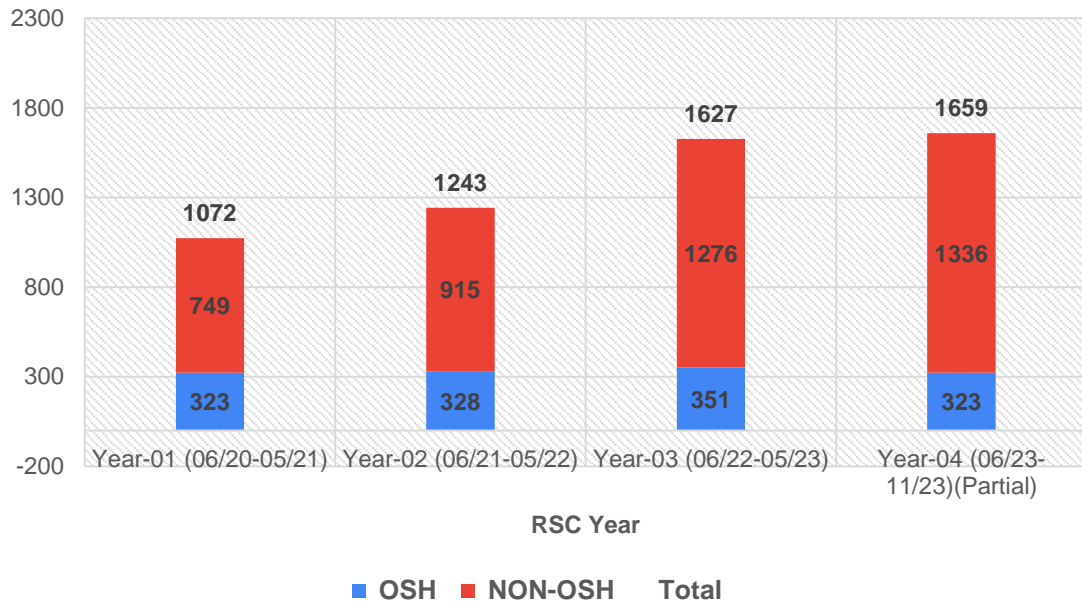


Figure 12: Complaints Mechanism accumulated data update as of 30 November 2023.

Total Complaints Closed/Forwarded				
Period	Total OSH Closed	Total Non-OSH Communicated with stakeholders	Total (OSH+ Non-OSH) Closed	Total Pending Complaints
RSC Period (06- 2020 to 11-2023)	1329	4273	5602	196



Resolved	716
Handled by other Accord/RSC process	25
Factory Closed	9
Disengaged	205
Withdrawn	69
Not Sustained	51
Resolved outside Accord complaints mechanism	183
Factory Not Covered	44
Duplicate	5
No Brand Factory	20
Resolved by Accord complaints mechanism	1
Non OSH	1

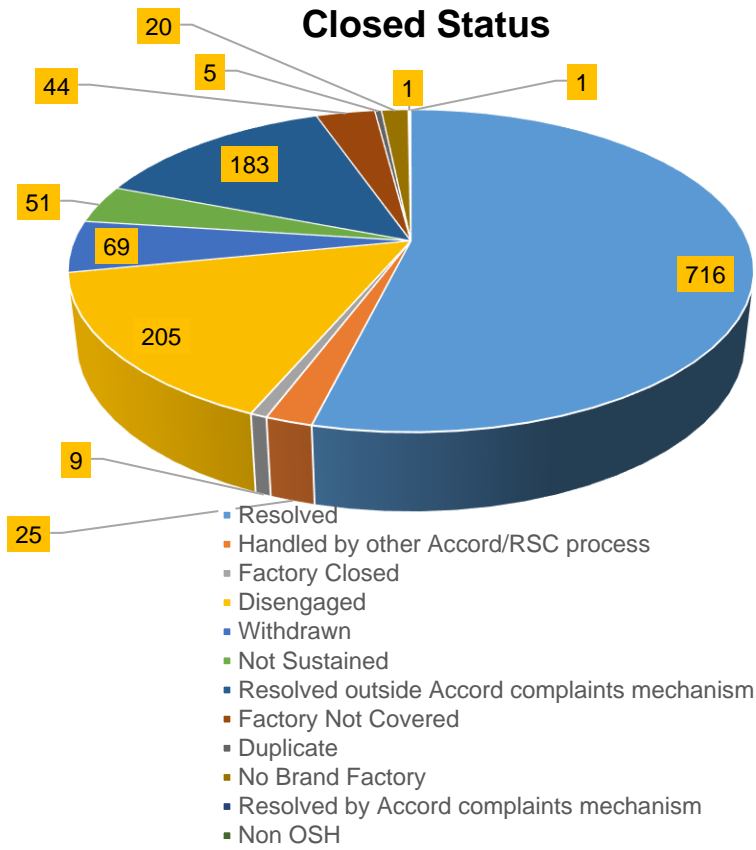


Figure 13: Complaints mechanism closed status as of 30 November 2023



RSC QUARTERLY AGGREGATE REPORT 4.2

On Remediation Progress and Status of
Workplace Programmes at RMG Factories
Covered by the RSC

PERIOD

September 2023 to November 2023

AUTHOR

RMG Sustainability Council (RSC)

ADDRESS

Level-5, Shanta Forum East Tower, 187,
188/B, Bir Uttam Shawkat Sarak, Tejgaon.
Dhaka-1208, Bangladesh.

PHONE NUMBERS

+88 02 226603540-3



contact@rsc-bd.org

