

Glenealy Plantations Sdn Bhd: No Deforestation, No Peat, and No Exploitation (NDPE) Policy Implementation Plan

Glenealy Plantations Sdn Bhd (GPSB) NDPE Policy Implementation Plan



No	Area	Strategy	Action Item	Timeline	Remarks
1.	Transparency	1. Maintain active communication with relevant stakeholders.	1. Establishment of GPSB website and publish appropriate non-confidential information such as: <ol style="list-style-type: none"> Company overview & Structure; Mill and Estate information; Sustainability / NDPE policies and certification; Stakeholder registration at communication with GPSB at company website; Corporate Social Responsibility (CSR) programs. 	In Effect	1. Company website effective on Aug 2020 http://glenealyplantations.com.my 2. <ol style="list-style-type: none"> NDPE Implementation Plan update (Date: 30 Apr 2021). Self-Declaration of Commitment to NDPE (Dated 20 Apr 2021 (Appendix: Figure 1.1.2.B))
2.	No Deforestation	1. New Development will undergo HCV/HCSA Assessment, thus no planting on HCV/HCSA identified area.	1. Impose a Moratorium Statement on any land clearing / land preparation for any new development. 2. New developments, if any, will be subjected to the findings of the integrated HCV/HCSA assessment.	In Effect	1. Moratorium on new development (Dated 15 Apr 2020). (Appendix: Figure 2.1.1.1) 2. Company NDPE Policy (Company website)
		2. Existing Plantation, to ensure all HCV and HCS area are identify and protected, including during replanting.	1. To systematically identify, manage and monitor the existing plantations' riparian zones and conservation areas.	Mar-22 (On-going)	1. Conservation area identification, management and monitoring activities. (Appendix: Figure 2.2.1.1)


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		3. No open burning policy in any new development or replanting	1. No Open Burning during new planting (if any) and replanting.	In Effect	1. Committed to company Sustainable Palm oil policy – No Open Burning Policy (Company Website)
		4. Identify all sources of GHG in our mill and plantation and will progressively decrease GHG emission.	1. To identify GHG sources, calculation of GHG value. 2. Pollutant Reduction Plan as per MSPO requirement.	On-going	1. Calculation of GHG value (Company Website)
3.	No Peat	1. No development on peatlands regardless any depth.	1. No existing development on peatlands	In Effect	1. Committed to NDPE Policy
4.	No Exploitation	1. No development will proceed without the FPIC of landowners and users with legal right. Any land conflict and grievances raised by local communities will be resolved through a functional unbiased grievance mechanism. All the relevant grievance documentation will be made available to relevant stakeholders.	1. Annual stakeholders (include local communities) meeting. (Appendix: Figure: 4.1.1)	Dec 2021	1. No new development
		2. Other Commitment to No Exploitation: a. Prohibit the employment of child labour b. Prohibit human trafficking and the use of forced or bonded labour.	1. To conduct training on “No Exploitation” commitment under the NDPE Policy and “Respect Human Rights” under Sustainable Palm Oil Policy. (Appendix: Figure: 4.2.1)	Dec-21 (on-going)	1. Committed to NDPE Policy – No Exploitation (Company Website) 2. Committed to Sustainable Palm Oil Policy – Respect Human Rights (Company Website)




No	Area	Strategy	Action Item	Timeline	Remarks
		<p>c. No discrimination based on race, colour, sex, language, religion, political or other opinion, national or social origin, birth or other status.</p> <p>d. No tolerance to violence, harassment, and sexual exploitation.</p> <p>e. Gender Equality and recognition of Women’s Reproductive Rights.</p> <p>f. Freedom of Association and Right to Collective Bargaining.</p> <p>g. Freedom of Speech.</p> <p>h. Equal Opportunities and Ethical Hiring.</p> <p>i. Legal employment with fair wages, benefits including the right to medical treatment and insurance, following national laws and legal requirement.</p>	<p>2. Periodic workers engagement and dialogue sessions, to address their needs. (Appendix: Figure: 4.2.2)</p> <p>3. To ensure post arrival orientation program is conducted for new workers.</p> <p>4. To give full cooperation to government agencies regarding audit of employment condition and fulfilment of statutory requirements. (Appendix: Figure: 4.2.4)</p> <p>5. Periodic internal assessments on “No Exploitation” related commitment.</p>		<p>3. Committed to Anti-Discrimination and Anti-Harassment Policy (Company Website).</p>
		<p>3. Secure and safe working environment (occupational health and safety).</p>	<p>1. Ensure existing Health and Safety Policy and Occupational Safety and health (OSH) Plan are implemented effectively.</p> <p>2. Regularly conduct Occupational Safety & Health (OSH) related training and awareness programs to the workers. (Appendix: Figure: 4.3.2)</p>	In place and on-going	<p>1. Committed to Health and Safety Policy (Company Website)</p> <p>2. Annual OSH Plan (Appendix: Figure: 4.3.1)</p>




No	Area	Strategy	Action Item	Timeline	Remarks
			3. Regularly OSH audits and inspections at workplace. (Appendix: Figure: 4.3.3)		
		4. Grievance Mechanism	1. Any conflict and grievance raised by stakeholders including employees or local communities will be resolved through a functional unbiased grievance mechanism.	In place and on-going	1. Grievances Procedure (Company Website) 2. Employees can raise grievance via Grievance Form. (Appendix: Figure 4.4.1.2) 3. Committed to Whistle blower policy (Company Website)
5.	Supply Chain	1. Include smallholders in the FFB supply base and ensure the relevant components of the NDPE policy is adhered to.	1. To inform and educate our suppliers regarding our commitment towards NDPE Policy.	Mar-22	1. email correspondence
6.	NDPE Policy and SOP Training	1. Establish Training Program for NDPE Policy and related SOP.	1. To conduct training to related operation team regards the NDPE policy and relevant SOP/Program.	Completed	1. Training Attendance (Appendix: Figure 6.1.1.1)

Appendix

Reference	Description	Photos
Figure 1.1.2.B	HCS Loss Self Declaration	 <p>The figure shows three pages of a document titled '2020 HCS Loss Self Declaration'. Page 1: Contains sections for '1. Introduction', '2. HCS Policy', and '3. HCS Loss Self Declaration'. It details the company's commitment to transparency and lists various stakeholders. Page 2: Continues the '3. HCS Loss Self Declaration' section, providing a detailed list of stakeholders and their contact information. Page 3: The signature page, featuring the signature of the Chief Executive Officer and the title 'CHIEF EXECUTIVE OFFICER'.</p>
Figure 2.1.1.1	Moratorium on new development	 <p>The figure is a memorandum from GLENEALY PLANTATIONS SDN BHD. It is dated 16 April 2020 and addressed to the Chief Executive Officer. The subject is 'MORATORIUM ON NEW LAND DEVELOPMENT'. The text states that the decision serves as a moratorium on any land clearing for all new development on natural soil and peatland regardless of status with immediate effect until further notice. It also mentions that the company is establishing a framework for all future land development, if any, to comply with the HCSF policy and will communicate this to the inspection operators based at a later date. The memorandum is signed by the Chief Executive Officer, GLENEALY PLANTATIONS SDN BHD.</p>

Reference	Description	Photos
<p>Figure 2.2.1.1</p>	<p>Conservation Area Management</p> <ul style="list-style-type: none"> (1) Identify, manage and monitor Rive Riparian Zone. (2) Identify Manage and monitor HBV Zone 	
<p>Figure 4.1.1</p>	<p>Annual stakeholder meeting</p>	
<p>Figure 4.2.1</p>	<p>Training:</p> <ul style="list-style-type: none"> • NDPE Policy – “No Exploitation” • Sustainable Palm Oil Policy – “Respect Human Right” 	

Reference	Description	Photos
Figure 4.2.2	Workers engagement and dialogue sessions	
Figure 4.2.4	Government agencies audit of employment condition	
Figure 4.3.1	OSH Annual Plan	

Reference	Description	Photos
<p>Figure 4.3.2</p>	<p>OSH Related Training (a) OSH-Coordinator Training (b) Chemical Safety Training (c) Tractor Safety Training (d) Other OSH Related Training</p>	
<p>Figure 4.3.3</p>	<p>OSH Campaign, Audit, Inspection and Intervention.</p>	
<p>Figure 4.4.1.2</p>	<p>Grievance Form</p>	

Reference	Description	Photos
Figure 6.1.1.1	NDPE Policy Training	