

SAC Action Plan

June 2024



SAC – ACTION PLAN – JUNE 2024

ALLEGATIONS	ACTIONS	TIMEFRAME	CURRENT STATUS
Irregularities in the approval process of the leases and sub-leases agreement	Conduct a thorough review of sub-leases and take necessary steps to address the irregularities identified in consultation with the government.	December 2024	Ongoing
Consultation, transparency and inclusiveness of landowners in the land acquisition process	Implement the Action Plan ("Malen Chiefdom Action Plan to Identify Landowner Acreages and Determine the Annual Lease Rent for Each Land Owner") in collaboration with the company GeoData SL (Ltd), approved by the Land Commission SL.	December 2024	Ongoing
	Address any claim (related to landowners' identification) that may arise during the implementation of the Action Plan.	December 2024	Ongoing
	Study the possibility of sharing land lease agreements with the Land Commission as part of the process of distributing land titles to landowners.	March 2025	Ongoing
Crop compensation	Address any claim (related to crops compensation) that may arise during the Action Plan.	December 2024	Ongoing

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Inequities in land lease payments	Identify landowners and their acreages during the Action Plan.	December 2024	Ongoing
	Examine with the Law Office the possibility of the company paying land leases directly into landowners' bank accounts.	March 2025	Ongoing
	A clear documentation process must be set up to monitor the payment of land lease.	Mars 2025	To start
Documentation compensation process	Each step of community engagement for the action plan should be clearly documented, and available at all section chief level with their acknowledgement of receipt.	February 2025	Ongoing
Degradation of natural areas and lack access to land for farming	Evaluate the dynamics of the evolution of greenbelts since project implementation.	February 2025	To Start
	Update the customary maps with the communities.	June 2025	To start
	Continue to regularly engage with stakeholders regarding the implementation of alternative projects.	Continuously	Ongoing

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ALLEGATIONS	ACTIONS	TIMEFRAME	CURRENT STATUS
Smallholders oil palm out-grower scheme	Engage with stakeholders to discuss alternatives to oil palm out-grower.	March 2025	To Start
Access to drinking water	Carry out a review of the water wells built by SAC in order to implement appropriate corrective measures where possible.	July 2024	Ongoing
	Define company standards for the quality of the hand pumps with the communities and put in place a clear monitoring system for those infrastructures.	July 2024	Ongoing
Water and waste management	Define a distance limit to be respected with communities/quarters and blocks receiving EFBs.	June 2024	Ongoing
	Regularly maintain culverts to prevent flooding.	Continuously	Ongoing
	Ensure appropriate treatment and traceability for different types of waste.	March 2025	Ongoing
	Conduct further analysis to determine the origin of phosphate compounds in surface water in order to take appropriate action.	July 2024	Ongoing

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ALLEGATIONS	ACTIONS	TIMEFRAME	CURRENT STATUS
Sexual Harassment and Gender-based violence 05/2024	Provide enhanced training for Gender committee.	May 2024	Done
	Promote inclusivity within the Gender Committee by including a representative for each department.	May 2024	Done
	Strengthen training programs on sexual harassment and gender-based violence that covers all levels of workers.	December 2024	Ongoing
	Establish budget to strengthen the Gender Committee.	November 2024	Ongoing
	Strengthen the Gender committee: by hiring additional in-house qualified staff or studying the possibility of collaborating with an external body	December 2024	To start
	Ensure that all cases of sexual harassment (SH) and Gender-Based Violence (GBV) are reported to the Gender Committee	December 2024	To start
	Establish a hotline (as part of an effective grievance system) for reporting Sexual Harassment at the workplace.	October 2024	Ongoing
	Ensure pictorial communication warning signs within the plantation that indicate clear disciplinary process and zero tolerance of sexual harassment	June 2024	To start

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Air pollution	Ensure communities along the main road have speed bumps.	May 2025	Ongoing
	Train drivers from the company on road safety.	December 2024	To start
	Continue to regularly sensitize Road users on road safety.	Continuously	Ongoing
	Continue recording and investigating all road accidents.	Continuously	Ongoing
	Continue to record road consumption of water.	Continuously	Ongoing

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Employment Conditions, Work safety and Labor Rights Violations	Provide a medical check to all workers irrespective of their contracts and nature of work.	February 2025	Ongoing
	Design a monitoring template to monitor workers especially in the mill, ensure working hours conform with the Employment Act 2023.	June 2024	Ongoing
	Review the transport allowance for workers.	Mars 2024	Done
	Review and implement recruitment and hiring procedures types of workers (seasonal, contractors, etc.).	September 2024	Ongoing
	Review and update the workforce spreadsheet and include workers ages and date contract signed.	June 2024	Ongoing
	Study the possibility of collecting worker's community origin information for new recruit.	May 2025	To start
	Ensure communities with a barray built by SAC have a notice board to post information about work opportunities and their rights at work + how to report abuse/corruption.	October 2024	Ongoing

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Criminalization and Intimidation of NGOs by local authorities: Judicial harassment	Communicate SAC's policy on human right to the local authorities and communities.	November 2024	Ongoing
Infringements by local authorities of freedom of movement and association	Publicly promote Policy on the Freedom of association with the Chieftdom authorities, and publicly affirm that all stakeholders are welcome in SAC's concession.	November 2024	Ongoing
	Review the company's security strategy with Chieftdom Committee, CSOs (relevant stakeholders).	January 2025	Ongoing
Buffer zones	Continue to implement the remediation and compensation plan.	Continuously	Ongoing
	Sensitize communities on the purpose of the riparian areas.	July 2024	Ongoing

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Analysis of the impact of the loss of agricultural land on the communities' right to food	Engage the Ministry of Lands/Agriculture to assess the food security in Malen Chiefdom.	January 2025	To start
	Continue to engage with community members on alternative livelihoods projects.	Continuously	Ongoing
	Finalize participatory customary mapping with communities.	June 2025	To start
	Update the identification criteria of vulnerable people and update the list per community.	Mars 2025	Ongoing

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