

Presentation on

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**Monitoring Workplace Safety in the RMG Sector**  
*Is Bangladesh a Pioneer or Still a Learner?*

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Presented by

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## Research team

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# Outline of the presentation

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- 1 Introduction
- 2 Recent accident scenarios in the RMG industry
- 3 Review of public safety monitoring entity
- 4 Review of private safety monitoring entity
- 5 Review of different certifications and initiatives
- 6 Progress of the initiatives undertaken in last five years
- 7 Safety monitoring in other countries (International Accord)
- 8 Conclusion and recommendations

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# 1. Introduction

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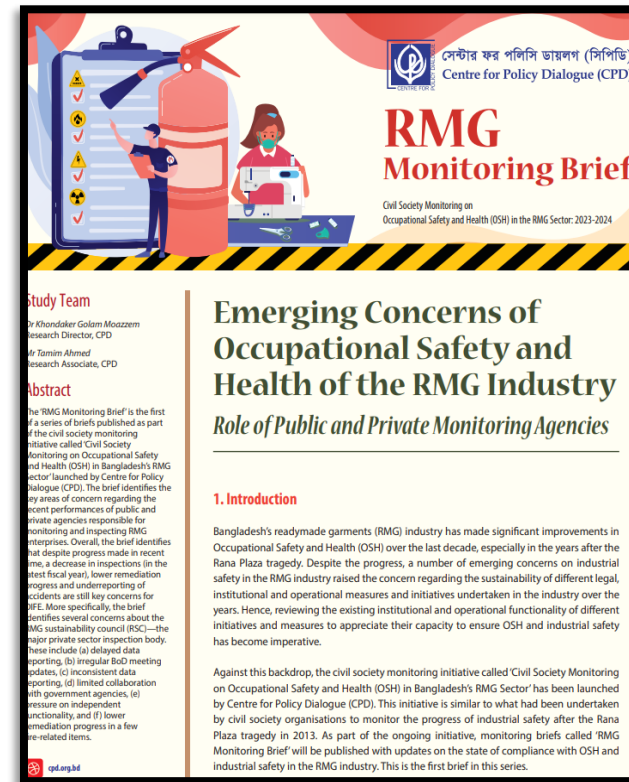
# 1. Introduction

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- ❑ 2023 marks the **10<sup>th</sup> anniversary** of the Rana Plaza catastrophe
- ❑ In the past decade, **several initiatives** have been undertaken to improve workplace safety in the RMG Industry
- ❑ Particularly, the formation of the **Accord** and **Alliance** has assisted the country in having strong guidance in safety monitoring
  - ❑ Nevertheless, since they are no longer active in Bangladesh, the DIFE and successors of Accord and Alliance (RSC & Nirapon) must continue **in the direction these two initiatives set**
  - ❑ In fact, in view of a few recent incidents in the garment industry, it has **become crucial to review** whether existing safety monitoring entities are in the right direction
- ❑ On the other hand, aligning with the commitment to ensuring workplace safety across the garment supply chain made in the **EU Sustainability Compact**, **International Accord** was formed in **2021** to implement a similar programme in other garment-supplying countries
  - ❑ The agreement of this International Accord **is set to expire on 31 October 2023**
  - ❑ Hence, it has also become **crucial to review the progress made by the international Accord as per its commitment**; particularly to understand if any reformation needs to be taken under consideration before the **new agreement on International Accord takes place**
- ❑ Against this backdrop, CPD relaunched '**Civil Society Monitoring on Occupational Safety and Health (OSH)**' in 2023, mirroring the efforts undertaken in 2014 after the Rana Plaza incident

# 1. Introduction (Contd.)

- ❑ The initiative's main objective is to undertake **open, critical, and independent civil society monitoring** and reporting of the functioning of Bangladesh's public and private sector monitoring initiatives and measures
- ❑ As of this date, **two RMG monitoring briefs** have been prepared and published under the initiative
- ❑ In preparing the brief a number of **KIIs** with several key stakeholders including RSC, DIFE, workers leaders, business representatives, etc. have been conducted
- ❑ Also, **data analysis** has been conducted on the secondary data available on different public and private websites
- ❑ This presentation mainly contains the **findings of these two RMG monitoring briefs**
- ❑ In addition, findings from a **brief review**, conducted on the safety monitoring programme of International Accord, have been included



RMG Monitoring Brief I  
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RMG Monitoring Brief II  
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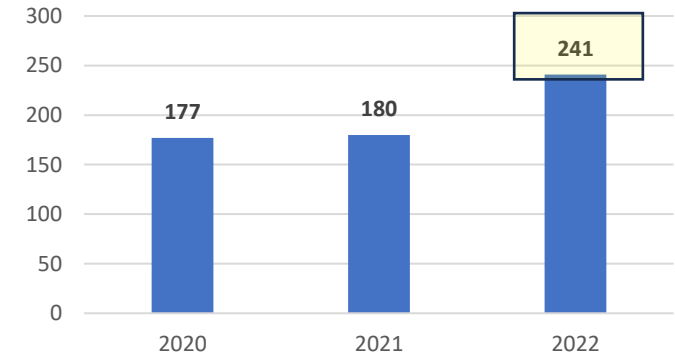
## 2. Recent accident scenarios in the RMG industry

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## 2. Recent accident scenarios in the RMG industry

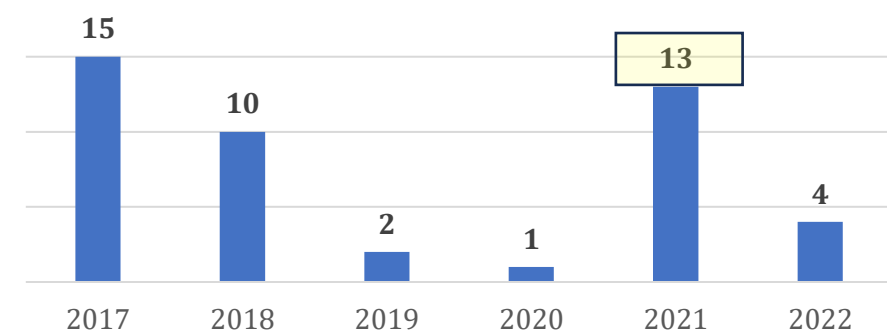
- ❑ The biggest success of the Bangladeshi RMG industry in the area of workplace safety is to be able to **ensure no repetition of Rana Plaza-like incidents**
- ❑ Also, the number of **accidents decreased** during the Accord and Alliance period
- ❑ However, lately, a **slight increase can be observed** in the number of industrial accidents in the RMG industry
- ❑ The number of fire accidents in the export-oriented RMG industry was 177 in 2020, which increased to 180 in 2021 and **jumped to 241 in 2022** (BFSCD, 2023)
- ❑ The number of workers who died in workplace accidents in the RMG industry **increased to 13 in 2021** from 2 in 2019 and 1 in 2020; however, it again **decreased to 4 in 2022** (Safety Rights, 2023)
- ❑ In fact, workplace accidents in the RMG industry continue to take place in 2023 as well.
- ❑ On February 19th, 2023, a garment worker at an export-oriented garment factory died when a **wall of the building collapsed** (Sustainable Fashion Resource Centre, 2023).
- ❑ On May 1st, 2023, a fire broke out at an export-oriented garment factory resulting in **at least 18 employees suffering burns** (The Daily Star, 2023).
- ❑ In 2023 (as of July 30th, 2023), workplace accidents **occurred in at least three RSC-covered factories as well**

Figure: Number of fire incidents in the export-oriented factories



Source: BFSCD

Figure: The number of workplace accident deaths in the RMG industry



Source: Safety and Rights

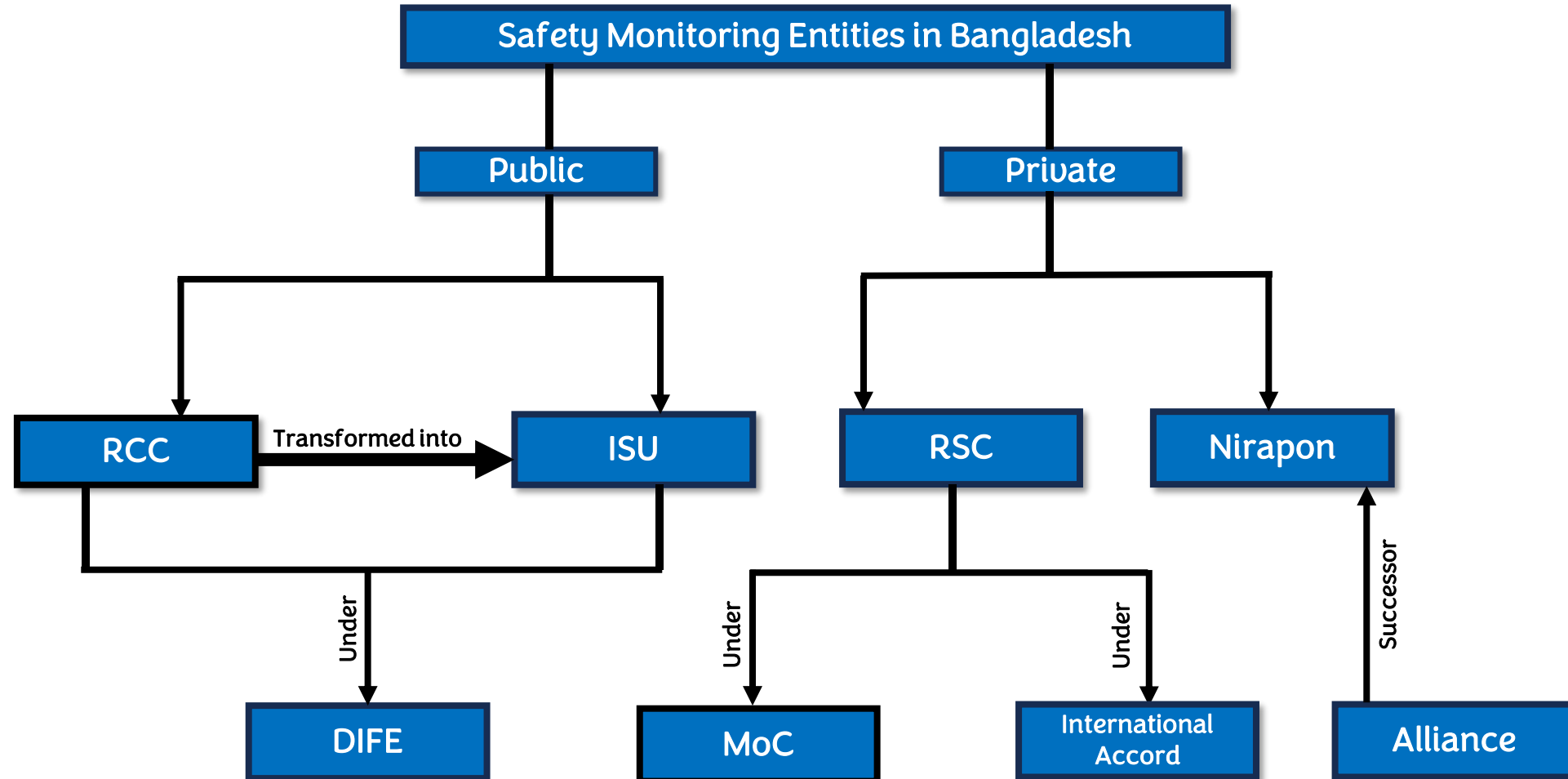


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## Review of public and private entities responsible for safety monitoring

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### 3. Review of public and private entities responsible for safety monitoring



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## 3. Review of public safety monitoring agency

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## 3. Review of public safety monitoring agency

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### 3.1 DIFE

- ❑ **Department of Inspection for Factories and Establishments (DIFE)** under the Ministry of Labour and Employment (MoLE), Government of Bangladesh (GoB) is responsible for health and safety inspection in all the establishments in Bangladesh
  - ❑ DIFE conducts **regular and special inspections** to implement occupational health, safety, and welfare measures as per the Bangladesh Labour Act, 2006 (including subsequent amendments of 2008, 2009, 2010, 2013, and 2018) and Bangladesh Labour Rules, 2015
  - ❑ Inspections of DIFE are generally conducted in four ways, including **a) regular inspection; (b) reactive inspection; (c) inspection on an accident site; and (d) inspection on a complaint basis.**
  - ❑ The regular inspections are conducted in either **an announced or unannounced manner.**
  - ❑ Over the years, DIFE has increased **its technical and institutional capacity**
  - ❑ Although still insufficient, DIFE has now a **higher number of human resources and more skilled inspectors** than before.
  - ❑ In the FY2021–22, DIFE conducted **43,644** inspections in factories, shops, and establishments, of which **3,560** were in the RMG industry.
  - ❑ The number of inspections by DIFE has decreased compared to the previous fiscal year, both for the overall and RMG industry – in FY2021, the total number of overall inspections was **47,361**, out of which **6,227** were in the RMG industry.

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### 3. Review of public safety monitoring agency

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- ❑ It is unclear what caused the decrease in the amount of inspections for the RMG industry, particularly when the **scope of inspections remains higher** with the introduction of **Labour Inspection Management Application (LIMA)**, a digital inspection application of DIFE
- ❑ However, more than the number of inspections, **the quality of safety inspection still remains** a major barrier – the inspectors allegedly do not perform their inspections as they are mandated to (Moazzem & Ahmed, 2022)
- ❑ On top of that, a recent concern regarding DIFE’s functionality is its increasing tendency to **keep the disclosure of information at a minimum**
- ❑ The common concern for DIFE still persists—**underreporting of accidents and injured and killed workers** for the **RMG industry**, which mismatches with reported data of other public and private agencies (such as Bangladesh Fire Service & Civil Defence, Bangladesh Institute of Labour Studies etc.)
- ❑ DIFE also does not have **any M&E department**, which prevents any internal scope of evaluation of its performance and managing data in an organised manner

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## 3. Review of public safety monitoring agency

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### 3.2 RCC

- ❑ In order to put a special focus on and oversee the remediation work of the National Initiative (NI) active factories under DIFE and International Labour Organization (ILO), a **specialised temporary unit of DIFE called Remediation Coordination Cell (RCC) was initiated in May 2017.**
- ❑ The cell was comprised of external engineers from **different public and private entities** (such as Bureau Veritas, BFSCD, etc.)
- ❑ The number of active NI factories reduced to **659 from the initial number of 1549(as of October 2022)** as a number of these factories had to stop their operation **due to safety non-compliance, the financial crisis** in view of COVID-19, etc.
- ❑ However, the remediation progress for the active NI factories was **limited to only 54 %** (Moazzem et al., 2023).
- ❑ The limited success stems from a number of key factors. These include: a) **NI factories mainly operate in rented buildings** which prevents them from investing in remediation; b) due to their operation in rented buildings and weak financial status, they had very **limited access to any credit support** for remediation; c) the financial emergency induced by **the outbreak of COVID 19**, shifted the focus of NI factories towards the **survival of their business** rather than on investing in remediation; d) **lack of self-interest of the NI factory's owners** as they were not adequately pressurised by the government, business associations and their buyers who are mostly from **non-European and non-North-American countries** (Moazzem et al., n.d.)

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### 3. Review of public safety monitoring agency

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- ❑ Concern remains over not only the **limited progress** of the remediation but also the fact that the progress is based on the **original non-compliances** identified during the initial Corrective Action Plan (CAP) inspection in 2013–2017
- ❑ Understandably, **a set of new non-compliances** will have emerged in these NI factories, which were not taken under consideration for the progress of remediation
- ❑ Moreover, the **54 % progress does not necessarily mean remediation of the most hazardous safety compliances**
- ❑ This means that an NI factory can achieve **more than 50 % progress** in remediation while not addressing the most hazardous non-compliances.
- ❑ In fact, the data shows that **the progress of remediation** remained the least for Non-Compliances related to fire

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## 3. Review of public safety monitoring agency

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### 3.3 ISU

- ❑ After the ceasing of operation of the RCC, **the responsibility of overseeing the remediation of NI factories has been shifted to ISU**, a newly formed unit of DIFE
- ❑ Unlike the RCC, **the ISU is a permanent unit**, and the role of this unit is not limited to monitoring factory remediation in NI factories alone
- ❑ Rather, along with overseeing remediation, ISU is dedicated to conducting safety inspections **in non-RMG factories as well**.
- ❑ However, as of date, it is uncertain how ISU is **performing its duty**.
- ❑ No distinct **information and data could be availed** from DIFE in regard to the current status of ISU.
- ❑ It is also not clear yet, how ISU is going to solve the many concerns that DIFE and RCC had. For example, how ISU will ensure that **its inspector performs proper inspection**; how **its approach is different from DIFE's inspectors**; how it will **address the aforementioned barriers for the NI factory remediation**, are still vivid.
- ❑ Overall, **sluggish progress** can be observed in enabling ISU to full functionality



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## 4. Review of private safety monitoring agency

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## 4. Review of private safety monitoring agency

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### 4.1 RSC

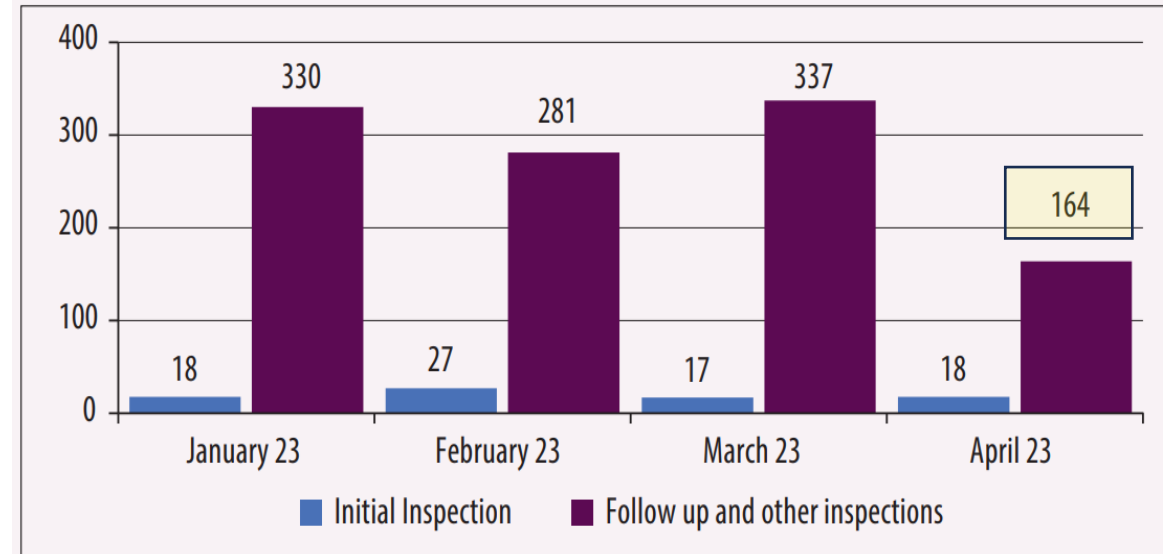
- ❑ RSC was set up to act as the **national initiative** that would implement the programme of the former Bangladesh Accord, now International Accord
- ❑ The role of RSC **holds significant importance** on various accounts in ensuring workplace safety in the Bangladesh RMG industry
- ❑ First, RSC has been **entrusted** with the responsibility of taking over and maintaining the significant achievements made by the Accord during its operation in Bangladesh. **In order for the RSC to establish its credibility by maintaining the higher standard set by the Accord**, it must continue to dedicate similar, if not greater, effort
- ❑ Second, RSC already **covered 1887 factories (as of June 2023), which is 51 %** of the total RMG export industry of Bangladesh [as per the data of MiB (2023)]. Also, RSC plans to gradually increase the number of **its covered factories in the future**. Hence, the operation of RSC **has a large impact** on workplace safety status in Bangladesh's entire RMG exporting industry.
- ❑ Third, all the RSC factories are also under the inspection coverage of the government agency DIFE. Despite recent improvements, DIFE still lacks inspection capacity in terms of skill and manpower. As a result, RSC has to play a **complementing role along with DIFE in ensuring safety monitoring** in the RMG industry

## 4. Review of private safety monitoring agency

### 4.1.1 Progress on safety inspections

- ❑ One of the key mandated tasks of RSC is to conduct regular fire, electrical, and structural safety inspections. RSC conducts several types of inspections – (a) initial; (b) follow-up; (c) special; and (d) verification inspections
- ❑ **Initial inspections** are conducted to identify key safety non-compliances and based on which a corrective action plan (CAP) is developed
- ❑ The plan stipulates a certain timeline for the CAP to be implemented. **In order to monitor the implementation of this CAP, RSC conducts follow-up inspections**
- ❑ Besides, RSC conducts **special inspections** in case any safety-related incident occurs in the covered factories
- ❑ According to the RSC website, since the formation of RSC as of April 2023, RSC engineers have conducted a **total of 760 initial inspections** (across all categories of safety) and **6,206 follow-up inspections**
- ❑ The monthly inspection data shows that in the last five months (December 2022–April 2023), RSC, on average, conducted **20 initial inspections** and **255 follow-up and other inspections each month** (Figure )
- ❑ **A sharp decline** can be observed in **follow-up and other inspections** in the latest month (April 2023). However, it is important to consider that some of these inspections, such as special inspections, are carried out on a demand basis.

Figure: The number of inspections conducted by RSC



Source: RSC monthly reports.

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## 4. Review of private safety monitoring agency

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- ❑ Therefore, the decline in **these specific types of inspections** may not necessarily indicate an overall reduction in RSC's inspection activities. Nevertheless, **an over 50 % decline in follow-up and other inspections** compared to previous months raises concerns.
- ❑ RSC should consider **publishing the data categorising the number of inspections based on their specific types**, as well as information on the number of unique factories that underwent inspections. This additional information would provide **further insights into the reasons behind** the drop in the overall number of inspections.
- ❑ The inspection-related data published by RSC lacks clarity, **leading to discrepancies that impede a clear understanding** of the actual inspection scenario. The **anomalies in data reporting** can be observed in case of number of inspections conducted every month, types of inspections time commitment for regular inspections, etc. These problems of RSC arose perhaps because of **handling a substantial amount of data and information with limited technical and human resources**.
- ❑ The number of inspections **against each priority category** is not available on the RSC website. Availability of such information would make the inspection distribution process more transparent.
- ❑ Furthermore, **the recently introduced priority category, 'Business order issue,'** should be reconsidered, as with existing limited capacity, **it may create additional pressure on RSC in conducting inspections**
- ❑ The analysis of Corrective Action Plans (CAPs) for **several RSC-covered factories indicates that RSC did not conduct special inspections promptly or at all**, despite accidents occurring in those factories
- ❑ While discussing with RSC, it said that the **boiler inspection team has undergone training and is now prepared**.
- ❑ However, it appears that the inspections of **boilers, reporting of inspection findings, and reporting of remediation progress of boilers** are still to be made good on
- ❑ It is important for workers' safety that those are carried out with the **same level of thoroughness as fire, building, and electrical inspections**

## 4. Review of private safety monitoring agency

### 4.1.2 Progress on Safety Remediation

- ❑ According to the latest data available in April 2023, the safety remediation progress of RSC-covered factories stands at **91.32 %**
- ❑ It is important to note that new factories are **continuously added to and removed from RSC coverage**
- ❑ Therefore, **monthly fluctuations in the progress percentage may not necessarily indicate overall improvement or deterioration in the remediation progress**
- ❑ RSC should consistently report the number of **factories included and excluded** from its coverage which would allow to understand the process better
- ❑ The distribution of factories based on remediation progress reveals a **consistent increase in the number of factories with 100 % verified progress** in recent months (Table)
- ❑ Item-wise data shows there has been **limited remediation progress** in case of a few fire-related items, particularly those requiring higher installation costs (Table)

Table: Remediation progress-wise RSC-covered factory distribution

Category	As of December 2022	As of January 2023	As of February 2023	As of March 2023	As of April 2023
Total	2158	2067	2168	2179	2186
Rate of remediation					
0-20%	10	10	11	11	12
21-40%	22	17	15	20	21
41-50%	26	22	26	23	23
51-60%	42	43	38	40	43
61-70%	51	59	61	61	55
71-80%	66	59	58	60	57
81-90%	153	57	149	144	143
91-100%	1295	1300	1306	1310	1317
100% verified	493	500	504	510	515

Source: RSC monthly reports.

Table: Remediation progress in different fire-related items

Name of the items	As of January 2023	As of February 2023	As of March 2023	As of April 2023
Installation of Fire Suppression System	63.50	26.61	22.40	22.40
Installation of Fire Detection & Alarm System	53.00	22.84	22.25	27.25
Adequate egress lighting in fire exits	96.10	96.20	88.00	89.00
Removal of lockable collapsible gates	99.10	99.20	96.00	96.00

Source: RSC monthly reports.

## 4. Review of private safety monitoring agency

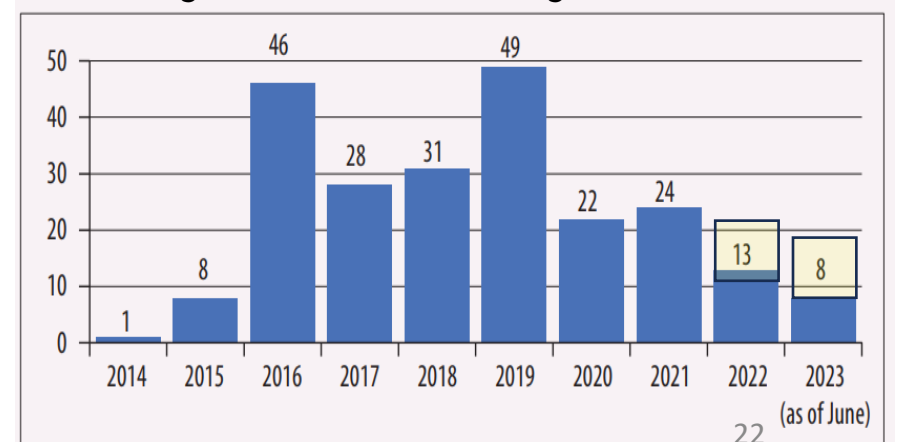
- ❑ As of April 2023, the installation progress for fire suppression systems stood at 22.40%, while the installation progress for fire detection and alarm systems was at 27.25 %
- ❑ While it is true that addressing the installation of these fire equipment in factories can be complex, and the RSC provides guidance to assist factories in this regard, there is a need for an increased focus on addressing the underlying causes of the slow progress in these specific items
- ❑ Much of the progress of remediation of RSC-covered factories depends on the effective implementation of the escalation protocol
- ❑ The data provided by the RSC highlights that a significant number of factories consistently remain in stage 2 of the escalation protocol (Table).
- ❑ However, in contrast, the number of ineligible factories has been relatively low in recent years.
- ❑ Over the course of three years (2020, 2021, and 2022), the average number of ineligible factories was lower than the average for the previous three years (Figure)

Table: Status of escalation protocol

Category	As of December 2022	As of January 2023	As of February 2023	As of March 2023	As of April 2023
Not in escalation	945	914	912	873	1005
De-escalated	382	402	401	391	392
Stage 1	309	347	328	313	316
Stage 2	182	183	182	169	170
<b>Total covered factories</b>	<b>1818</b>	<b>1828</b>	<b>1823</b>	<b>1823</b>	<b>1883</b>

Source: RSC monthly reports.

Figure: Status of ineligible factories



Source: RSC website.

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## 4. Review of private safety monitoring agency

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- ❑ Increasing transparency in the **entire escalation process** could be achieved by disclosing the data of RSC factories, specifically regarding the duration of their stay in each category
- ❑ There is a lingering concern that merely abstaining from placing orders by Accord member brands in **'ineligible factories'** may not sufficiently address safety concerns within these facilities. In fact, during the preparation of this brief, **several ineligible factories, which had become ineligible were found to be operating at full capacity**
- ❑ It would be worrisome if these factories **continued their operations by subcontracting to other facilities**, especially if they **subcontract to other RSC factories**
- ❑ As per the agreement, in case RSC factories are announced ineligible, **UD for the factories would be annulled by BGMEA**, which means they would not be able to export. Therefore, it needs to be **investigated whether BGMEA is effectively fulfilling that**
- ❑ At the same time, exploring alternative **mechanisms to ensure compliance or shut down these factories** (while ensuring the workers receive full severance according to Bangladeshi law and consistent with the Accord agreement) is crucial

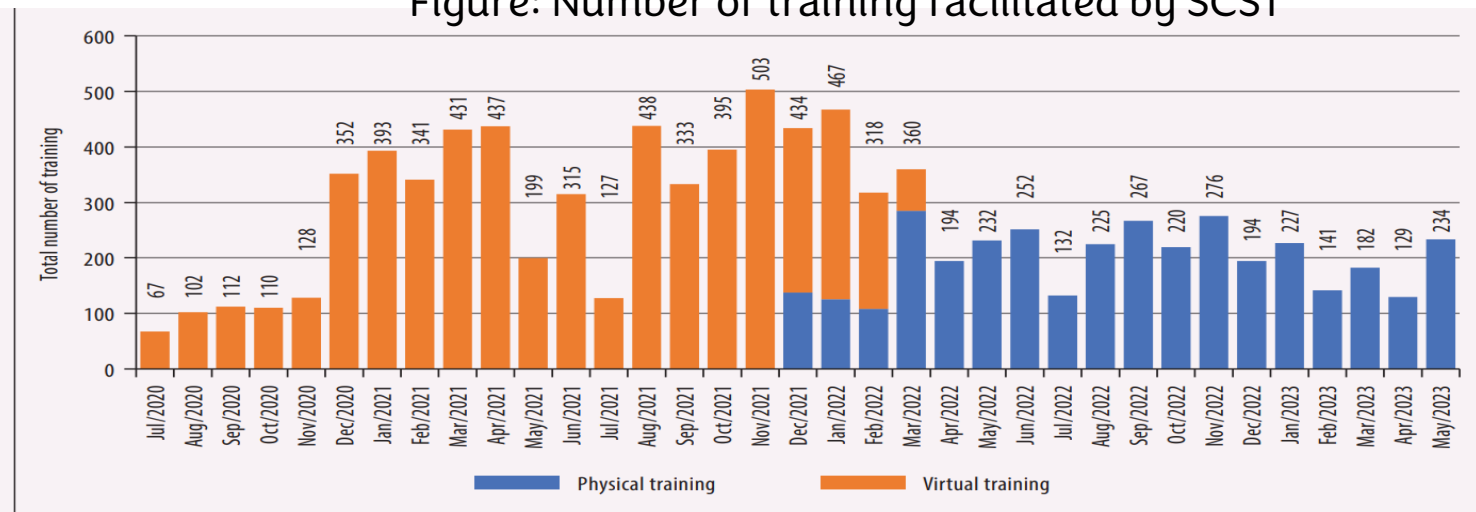
### 4.1.3 Progress on Safety Training

- ❑ The **'8-Session Safety Committee Training (SCST)'** is a significant training session offered by the RSC
- ❑ Additionally, RSC arranges **All Employee Meetings (AEM)** in its member factories.
- ❑ During the initial period of RSC, all the training was held in virtual mode; hence, the number of training conducted each **month was high**. However, with the ease of COVID restriction, **RSC started physically conducting all the training**
- ❑ According to the interviewed representative of the RSC, despite providing continuous training to safety committees, the RSC is **receiving complaints from workers on issues that factory-level safety committees should have solved**. This indicates that RSC's existing safety committee training has a scope for further improvement

## 4. Review of private safety monitoring agency

- ❑ The workers' representatives expressed **concerns about the effectiveness** of conducting the training solely within the safety committees in ensuring overall safety. They claim that **many factories form safety committees by selecting workers who serve the interests of management**
- ❑ Consequently, providing training exclusively to the safety committees **may not effectively raise awareness among the general workers**. Hence, **conducting all-employee meetings (AEM)** by the RSC would be a more effective approach to reaching the entire workforce
- ❑ Currently, it seems that the RSC primarily focuses on the **Safety Committee and Safety Training (SCST)**
- ❑ To address the **concerns raised by the interviewed workers' representatives**, equal attention should be given to the **implementation of AEM as well**.
- ❑ Now only the total number of workers covered through **AEM is being reported by RSC**. RSC should reconsider publishing the number of factories covered by AEM on a monthly basis

Figure: Number of training facilitated by SCST



Source: RSC monthly reports.



## 4. Review of private safety monitoring agency

### 4.1.4 Progress on Safety and Health Complaint Addressing

- ❑ According to the data reported by RSC, since its inception in June 2020 to April 2023, the agency has received a total of 4,259 complaints
- ❑ Among these, 1,096 (26 %) of the complaints are specifically related to Occupational Safety and Health (OSH) matters. The remaining 3,212 complaints (75 %) are non-OSH-related
- ❑ Also, as of the date, it has resolved a total of 468 complaints, which is 42 % of total OSH-related complaints.
- ❑ The monthly reported data shows that in the last three months (February- April 2023), RSC received 33 OSH complaints on average each month (Table). In the same period, on average, RSC has resolved 16 OSH complaints each month.
- ❑ In other words, more than half of the OSH complaints remain unaddressed as of yet, which weakens workers' interest in using the reporting tool to obtain remedies
- ❑ In the month of January 2023, the number of non-OSH complaints was more than a thousand against only 64 OSH complaints (Table). Hence, DIFE and the brands should take appropriate measures in handling workers' non-OSH-related concerns
- ❑ As per one interviewed respondent, one key challenge of RSC regarding complaint management is managing the sheer volume of complaints they receive with limited human resources

Table: Status of complaint submitted to RSC

Month	OSH complaint					Non-OSH complaint	Total Resolved
	Engineering (structural/fire/electrical safety)	Working environment related*	Reprisal for having filed a complaint	Others	Total OSH		
January 2023	9	16	1	38	64	1040	-
February 2023	2	5	1	37	45	232	11
March 2023	1	5	1	39	46	111	20
April 2023	3	3	2	25	33	130	16

Source: RSC monthly reports.

Note: \*(incl. COVID-19 related, unsafe drinking water supply, excessive heat, workplace violence, forced overtime, denial of maternity pay/leave rights, denial of sick leave, physical and sexual harassment)

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## 4. Review of private safety monitoring agency

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### 4.1.5 RSC's Institutional Framework

- ❑ Once the RSC was established as a permanent entity, it had to **develop a comprehensive institutional framework to function effectively as a fully-fledged institution**. When RSC assumed responsibilities over the Accord-covered factories, it did not have a **fully organised and effective institutional structure**. As such, at that time, it **faced several challenges**, some of which still persist.
- ❑ RSC has made **consistent efforts** to establish itself as a comprehensive monitoring institution. It has successfully **established dedicated departments, including IT, HR, and Accounts**, to enhance the efficiency of its operations. However, the current data reporting mechanism of RSC suggests that **further improvements are needed in the skills of its workforce**.
- ❑ One of the forthcoming challenges for RSC could be **securing adequate funding** to sustain and expand its operations. Currently, the organisation relies on **external funding from brands and suppliers**. To address this, RSC is exploring the **implementation of a resource generation mechanism**.
- ❑ However, reduced funding from brands could result in **decreased accountability for upholding the binding obligations of Accord signatories at their supplier factories**. Therefore, **brands should reevaluate** their approach to funding the RSC to ensure continued commitment to these responsibilities
- ❑ According to workers' representatives who were interviewed, **workers' participation has been marginalised in the institutional structure of RSC**, unlike in Accord. Workers' representatives argue that both **brands and employers are essentially business entities**, and this arrangement shifts decision-making power towards business interests. Furthermore, workers' representatives also express a sense of **lacking technical knowledge** to assess many of the decisions made by RSC.
- ❑ Consequently, they feel **unable to actively contribute to the decision-making processes** of the RSC, further undermining their involvement in the institution.

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## 5. Review of Different Certifications and Initiatives

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## 5. Review of Different Certifications and Initiatives

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- ❑ Along with these authorities, different initiatives and certifications also **conduct inspections on safety** as part of their audit process in providing initiative membership or certifications
- ❑ Some of them include **Oeko-Tex Step, WRAP, Bluesign, SEDEX, SAI (SA 800), BSCI, FWF, etc.**
- ❑ However, there has been **uncertainty over how effectively these agencies could conduct their safety audit in providing certification, particularly for a number of reasons.**
- ❑ These include a) **auditing under these initiatives/ certifications is a time-bound process.** In some cases, even if the auditor senses misrepresentation of documentation by RMG factories, they cannot go for **deep investigation due to time constraints and suppliers' reluctance**; b) for a number of certifications and initiatives, **the suppliers choose a particular audit firm and make the payment.** This sometimes causes the auditors to **come to terms with the suppliers** on certain non-compliance issues; c) **certification auditors' goal is to do business** more than anything before. As a result, they always work to hold the brand's reputation high, **ignoring many important concerns, etc.** d) these private auditing firms **have a limited disclosure of their findings** as such workers, unions, and other buyers and remained uninformed of any of the enabling issues (Moazzam and Ahmed, 2022; Clean Clothes Campaign, 2019)

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## 6. Progress of the initiatives undertaken in last five years

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## 6. Progress of the initiatives undertaken in last five years

□ In the last five years, with the support of one of the programmes of ILO, a number of initiatives were planned to implement to strengthen workplace safety status in Bangladesh. The progress of these selected initiatives are:

Area	Commitment	Progress
Effective safety regulation by government	Establishment of RCC as a permanent entity by transforming it into ISU	Completed (ISU still to be fully functional)
	Integrating relevant safety licencing systems in the BIDA-OSS	In progress (MoU has been signed)
	Capacity enhancement of DIFE	In progress ( 162 new posts approved)
Effective and equitable labour inspection system	Introduction of Labor Inspection Management Application (LIMA)	Completed (still to be fully functional)
	Initiation of DIFE Hotline	Completed (not all workers are aware)
OSH improved in policy and practice	Launching of Employment Injury Insurance Scheme (EISS)	Completed (at a pilot scale)
	Adoption of National Plan of Action on Occupational Safety and Health 2021-2030	Completed
	National occupational safety and health research and training institute (NOSHRETI)	In progress (still to be functional)
	SC Committee fully functionality	In progress (no monitoring entities)
Factory remediation	Full remediation of NI Factories	In progress (54%)

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## 7. Safety monitoring in other countries

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## 7. Safety monitoring in other countries

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### 7.1 International Accord in Pakistan

- ❑ In December 2022, Accord signatories decided to initiate a new safety programme in Pakistan initially for 3 years (from 2023)
- ❑ The agreement is named as '**Pakistan Accord on Health & Safety in the Textile & Garment Industry**' ('Pakistan Accord')
- ❑ The programme will be executed with the collaboration and involvement of the Pakistan government authorities and the manufacturing industry
- ❑ The Pakistan Accord will cover all **Cut-Make-Trim (CMT) facilities**, namely Ready-Made Garments (RMG), home textile, fabric, and knit accessories suppliers, producing products for Accord signatory companies
- ❑ As of now **422 companies have signed** the Pakistan Accord agreement
- ❑ The Accord is currently finalising the **safety standard for electrical, structural, fire, and boiler safety** in Pakistan (due to be published end of this month)
- ❑ The **mandate and composition of the national governance body** for the Pakistan programme still need to be determined. This means at the time of signing it was not clear, yet which actors would have which % of representation in the board (and, so, whether the composition would be similar to the RSC or not)
- ❑ Most recent conducted **Pilot Factory Safety Assessments** In Pakistan on a few apparel entities reveal somewhat similar challenges in remediation that Bangladesh RMG industry faced during its implementation of Accord and other initiatives
- ❑ The findings of the report suggest that there could be a potential challenge with **financing structural remediation** in a rented building
- ❑ Similar to case of Bangladesh, the findings also suggested a contradiction of the **remediation requirement** against the requirement of other certifications requirement i.e., LEED;



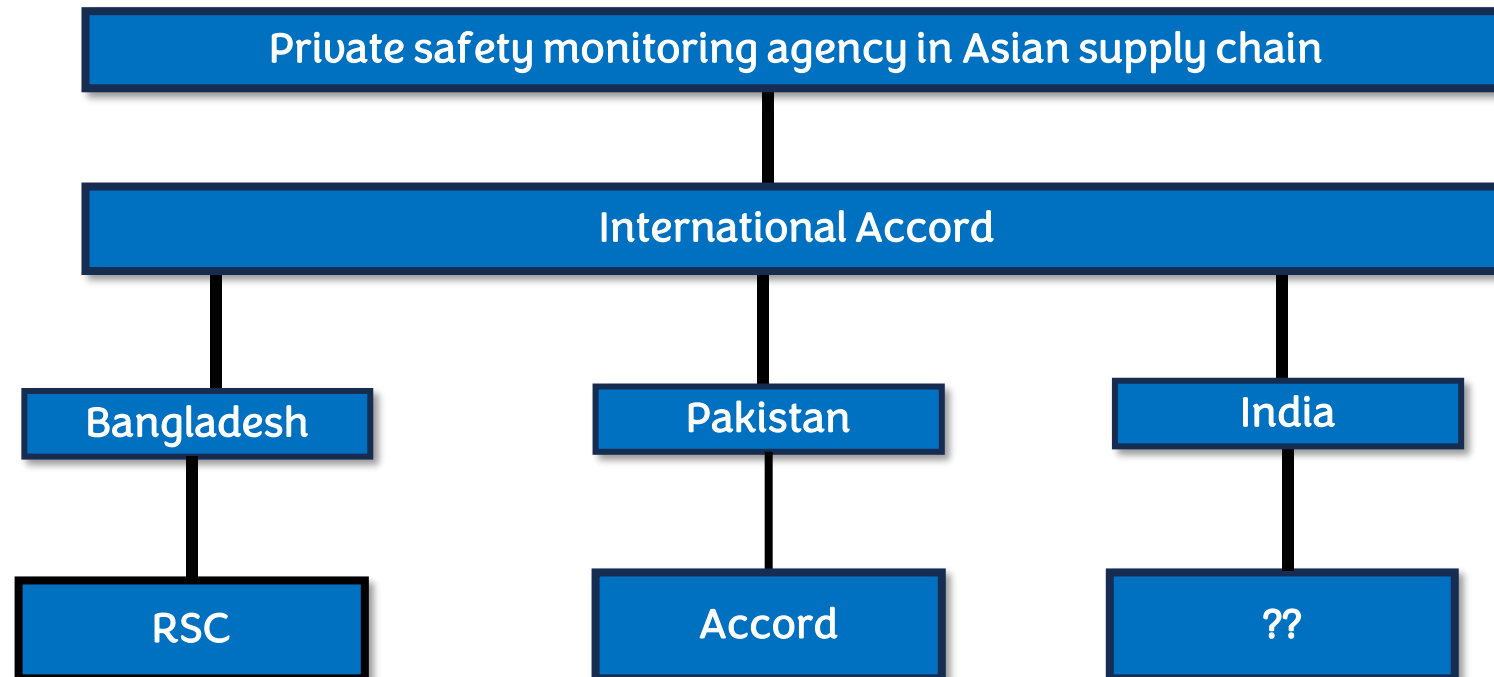
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## 7. Safety monitoring in other countries

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### 7.2 International Accord in Sri Lanka, India, and Morocco

- ❑ The agreement of this International Accord is set to expire on **31 October 2023**
- ❑ As per the July 2022 Accord steering committee meeting, alongside Pakistan, brands also showed support for expanding the Accord programme to 3 other priority countries, **namely Sri Lanka, India, and Morocco**
- ❑ As the 2021 International Accord had specified the condition for the programme **to be expanded to at least 1 other country**, the new International Accord will likely include similar reference to expansion to additional countries, but it's unclear how specific the language will be



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## 8. Conclusion and Recommendations

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## 8. Conclusion and Recommendations

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### 8.1 Recommendations for Bangladeshi safety monitoring

- ❑ DIFE should continue to **strengthen its technical and institutional capacity**;
- ❑ A number of legacies of achievement made during the last decade need to be carried on; for example, **LIMA is an important component for DIFE**; however, it **needs to be made fully functional**;
- ❑ The DIFE should continuously **collaborate with private agencies** in conducting inspections to improve its quality of inspection;
- ❑ DIFE could be given the legal authority to close down any unsafe building in case it found **any fatal safety issues in any factory building** it would enable them to work more actively in the area of safety;
- ❑ Unfinished **remediation of NI factories must not be stopped**; **ISU needs to be made fully functional** in the shortest possible time to continue monitoring these factories' remediation;
- ❑ While RSC covers 1,887 factories, Nirapon covers approximately 350 factories (with the possibility of significant overlap between the two initiatives), and RCC covers 659, there are at least 856 RMG factories ( $3,752 - 2,896 = 856$ ) which are not under the purview of any inspection mechanism at present. Hence, a **significant number of factories (at least 22.8 %) remain uncovered by any private or public monitoring initiatives** . A **dedicated focus** should be on how these factories can be brought under a safety mechanism to effectively address their compliance and safety concerns

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## 8. Conclusion and Recommendations

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- ❑ The public disclosure of information regarding the RSC-covered factories **needs to be comprehensive**, regular, updated, and accurate. It is advisable to consider disclosing additional information, such as inspections against priority tables and the duration of factories in each escalation stage.
- ❑ RSC needs to focus on **remedial measures** in cases where progress made by the factories is rather slow, including the installation of fire detection and alarm systems and fire suppression systems. If factories fail to comply with these measures, they **should be included in the escalation protocol**. In the event that factories are unable to invest in these items due to high costs, RSC can inform **policymakers and propose the implementation of appropriate incentives** to support these factories in addressing the identified items. **Brands should also be informed** about this, as brands must pay sufficient prices to the factories to maintain safe workplaces as part of their responsible business conducts
- ❑ The factories that are not under the purview of any institutional monitoring system **should be included in the review mechanism under the ISU**. RSC needs to ensure that these factories **have no business relationship with the RSC-covered factories**.
- ❑ Regular, **full boiler inspections should be given an extended focus**. The inspection findings should be publicly reported comprehensively, including at the individual factory level
- ❑ A proper **monitoring mechanism needs to be set up between RSC and the DIFE** for factories that are found to be 'ineligible'. Unless these factories are taking measures for compliance-related issues, their license of operation should be **cancelled and will not be renewed by the DIFE**
- ❑ Factories not covered by RSC should **be closely monitored by public monitoring bodies**. To achieve uniform monitoring standards for all factories, regardless of their monitoring agencies, **there can be a mutual exchange of technical expertise** between DIFE and RSC
- ❑ RSC needs to speed up its verification and implementation of the **grievance mechanism of a large number of OSH-related complaints** made by the workers. The mechanism must be made **capable of providing more timely remedies**.

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## 8. Conclusion and Recommendations

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### 8.2 Recommendations for international safety monitoring

- ❑ The process of expanding Accord in different countries **must be expedited** particularly given that a large number of accidents has been occurring in the global apparel supply chain;
- ❑ Given that Accord has vast experience working in the Bangladeshi RMG Industry, it can more **efficiently work in other countries**;
- ❑ The effort of the Accord should not be limited to **expanding the programme in other countries**, rather, an additional focus should be **paid to increasing the number of brands** that are signatories of Accord;
- ❑ International Accord could work to enhance the existing **technical knowledge** of workers' representatives in regard to OSH which would allow them to be more effectively involved in the programme;
- ❑ Formation of an **International Accord Forum** could be considered where at the one end Bangladeshi RMG industry could share its technical expertise with the countries to be included in the international accord, on the other end, Bangladesh also could take some learning from these countries in case any new mechanism is implemented by them

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## 8. Conclusion and Recommendations

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- ❑ DIFE and DoL need to set up an **effective grievance mechanism** for the large number of complaints made by workers on non-OSH-related issues. RSC could take responsibility for handling non-OSH complaints (such as payment of maternal benefits, harassment, etc. related issues; given the higher sensitivity, issues related to trade union registration could be kept out of consideration temporarily). Nevertheless, to do so effectively, **the capacity of RSC's complaints-handling** team must be appropriately strengthened.
- ❑ RSC should ensure **regular follow-up inspections**, especially after any incidents occur in the factories under its coverage.
- ❑ RSC needs to improve its training modules, structures, and implementation mechanism of safety-related training – the Safety Committee and Safety Training (SCST) and all-employee meetings (AEM). Along with the ongoing focus on SCST, more effort needs to be put in place on **AEM in order to enhance maximum** outreach of safety-related issues to workers. Also, regular **evaluation programmes** should take place so that the effectiveness of these training can be understood.
- ❑ RSC's **institutional structure** needs to be reviewed– under the ongoing representation, the voices/views of workers are not properly reflected in the decision-making process due to structural, compositional, and technical concerns

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## 8. Conclusion and Recommendations

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### 8.3 Expected intervention in the upcoming years

- ❑ Continue taking the initiative for implementing the **National Plan of Action on Occupational Safety and Health** which includes
  - Strengthen **National OSH System**;
  - Strengthen **OSH Inspection Mechanism to Ensure Compliance**;
  - Promoting **OSH Culture**;
  - Promote **OSH Activities by Employers and Workers**;
  - Strengthen **OSH Inspection Mechanism to Ensure Compliance**;
  - Extend **OSH Protection to SMEs and Informal Economy**;
  - Strengthen **Occupational Accident, Injury/Disease Reporting System**;
  - Promote **OSH Research, Education, and Training**
- ❑ **Ratification of the C190 of ILO** should be under consideration
- ❑ Consider **tax cut on safety relative equipment** to ensure higher accessibility;
- ❑ Monitoring agencies (particularly liking of BFSCD) must be targeted to be made **gender responsive**;
- ❑ Consider full-fledge initiation of **employment injury insurance scheme** in the RMG industry.

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**Thank You**

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