



IOI GROUP

IOI Group Sustainability Implementation Plan

INTRODUCTION

This **Sustainability Implementation Plan** (SIP) serves as a practical working document that puts into practice the aspiration and commitments stated in our IOI Group Sustainable Palm Oil Policy (SPOP). The SIP contains **clear activities, milestones and timelines** for each subject area outlined in the SPOP.

The SIP will be regularly updated over time to reflect stakeholder input and implementation on the ground. We will report on our progress every quarter, beginning in Q4 2016. Additionally, **from 2018 onwards**, we will begin to review all our implementation plans annually to better represent the current progress of our activities as well as to add new activities related to any new commitments in our on-going sustainability journey.

Dato' Lee Yeow Chor
Group Chief Executive Officer

Dr. Surina Ismail
Group Head of Sustainability

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ACTIVITY/MILESTONE	STATUS PER SEPTEMBER 2018	2018		2019								2020					
		Q3		Q4		Q1		Q2		Q3		Q4		Q1	Q2	Q3	Q4
		JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAC	APR	MAY	JUN	JUL	AUG	SEP	OCT

RSPO -NEXT

POLICY COMMITMENT:

- **Committing to implement RSPO NEXT in our Malaysian plantations, commencing end of 2016.**

Ladang Sabah Mill	Stage 2 RSPO Next audit successfully conducted on 14 – 17 May 2018. In progress of addressing non-compliances (NC).	<i>In progress</i>																	
Pukin Mill	Stage 2 RSPO Next audit successfully conducted on 13 – 16 Aug 2018	■																	
Syarimo Mill	Stage 2 RSPO Next audit successfully conducted on 9 – 13 July 2018	■																	
Leepang Mill	Stage 2 RSPO Next audit successfully conducted on 27 – 30 August 2018	■																	

RSPO Certification

POLICY COMMITMENT:

- **Certifying the outstanding management units, in Sarawak and Indonesia, in accordance with the published time-bound plan**
- **To comply with all applicable legislation and codes of practice.**

Unico Desa Mill	Certified	<i>Completed</i>																	
Unico Mill	Successfully received RSPO certification on 5 July 2018	<i>Completed</i>																	
SKS Mill	To be certified by 2020, based on time-bound plan submitted in RSPO Annual Communication of Progress (ACOP) report. As part of the preparation, we have engaged BSI Indonesia to conduct the gap assessment in PT. SKS for RSPO and ISPO. The gap assessment was conducted on 27 to 31 August 2018.	■																	



ACTIVITY/MILESTONE	STATUS PER SEPTEMBER 2018	2018		2019								2020									
		Q3		Q4		Q1		Q2		Q3		Q4		Q1		Q2		Q3		Q4	
		JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB

MSPO Certification

POLICY COMMITMENT:

- Committing towards sustainable production of palm oil and its continuous improvement as outlined in the Malaysian Sustainable Palm Oil (MSPO) guidelines. In supporting the Malaysian government’s target, we will ensure all our Malaysian plantations are MSPO-certified by the end of 2018.

Sabah

Ladang Sabah Group	Certified	<i>Completed</i>																							
Pamol Group	Certified	<i>Completed</i>																							
Sakilan Group	Certified	<i>Completed</i>																							
Mayvin Group	Main assessment audit completed, certificate issuance pending																								
Leepang Group	Certified	<i>Completed</i>																							
Baturong Group	Certified	<i>Completed</i>																							
Syarimo Group	Certified	<i>Completed</i>																							
Morisem Group	Certified	<i>Completed</i>																							
Unico Desa Group	Stage 2 audit to take place as scheduled																								
Unico Group	MSPO certifying process to be conducted once RSPO certificate is issued. To be conducted in March 2019 concurrent with RSPO surveillance audit																								

Peninsular

Pukin Group	Certified	<i>Completed</i>																							
Gomali Group	Certified	<i>Completed</i>																							
Bukit Leelau	Main assessment conducted on 24 – 27 September 2018																								
Pamol Kluang	Audit to take place as scheduled																								



ACTIVITY/MILESTONE	STATUS PER SEPTEMBER 2018	2018		2019								2020									
		Q3		Q4		Q1		Q2		Q3		Q4		Q1		Q2		Q3		Q4	
		JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAC	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB

Labour Rights Monitoring System

POLICY COMMITMENT:

- Implementing a labour rights monitoring system, with the involvement of an external partner to verify labour conditions, compliance with labour policy requirements and improve welfare and working conditions. We will take necessary corrective action to address any identified non-compliances.
- Eliminate all forms of illegal, forced, bonded, compulsory or child labour and in particular, follow responsible recruitment practice.

Moving forward, the estates are given a timeline for full implementation of new guidelines and policies introduced in October 2017. The monitoring is measured by milestone achievement for each region of IOI Plantation;	Peninsular Full implementation commenced	<i>Completed</i>																						
	Sandakan Full implementation commenced	<i>Completed</i>																						
i. Peninsular - July 2018 ii. Sandakan - August 2018 iii. Lahad Datu - September 2018	Lahad Datu Full implementation commenced	<i>Completed</i>																						
Continuous improvement on the implementation of the new labour policy and guideline.	Full implementation are in place. Continuous improvements are being conducted such as trainings and briefing from the respective authorities involved in the policy from time to time.	<i>Ongoing</i>																						
	IOI Internal Grievance Log consists of grievance report sent by staff and workers are developed.																							
Visit to IOI's Sabah Plantation by NGO	Completed. Full report received in April 2018. Drafting corrective action or continuous monitoring plan to address comments from Finnwatch regarding our labour rights implementation.	<i>Completed</i>																						
	Corrective action measures to address comments from Finnwatch have started. Currently, internal monitoring report and data analysis on some of the labour matters is being developed as part of the corrective action measures.																							



ACTIVITY/MILESTONE	STATUS PER SEPTEMBER 2018	2018		2019								2020									
		Q3		Q4		Q1		Q2		Q3		Q4		Q1		Q2		Q3		Q4	
		JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	Q1	Q2

Human Rights and Workplace

POLICY COMMITMENT:

- Uphold the right to freedom of association and recognize the right to collective bargaining and allow trade unions to have access to our workers.
- No retention of workers' passports/identity documents or withholding of workers' wages other than that prescribed by law.
- Pay all workers the statutory monthly minimum wage and overtime compensation, in accordance with the current labour regulations.
- Provide fair and equal employment opportunities for all employees, regardless of race, nationality, religion or gender.
- Promote a safe and healthy working environment that is free of sexual harassment.
- Provide adequate equipment and training on the implementation of health and safety policies.
- Provide training and development to employees to ensure achievement of their full potential.

Translations of new labour policies in various languages of the workers	Policies in Bahasa Malaysia, English & Bahasa Indonesia are available. Translation to Bengali for Bangladeshi and Tagalog for Philippine workers have been done for the following policies: 1. Foreign Workers Recruitment Guideline and Procedures in Malaysia 2. Minimum Wage and Leave Pay Policies in Malaysia 3. Equal Opportunity Employment and Freedom of Association Policy	Completed																					
	Policies to be translated to Bahasa Malaysia and Indonesia; 1. Policy on Harassment at Workplace 2. Safety and Welfare Policy (once the English version is finalised, expected to be in Q4 2018)																						
Training and development of employees in Malaysia for year 2018	1. Training on revised labour policies Latest training conducted in Peninsular Malaysia in Q2 2018.																						
	2. Development of workers induction videos to be shown to the new workers on the first day of work and upon employment confirmation.																						
	3. Engagement with authorities to conduct briefing or training on the operation level regarding human rights and harassment at workplace.																						



ACTIVITY/MILESTONE	STATUS PER SEPTEMBER 2018	2018												2019				2020							
		Q3			Q4			Q1			Q2			Q3		Q4		Q1		Q2		Q3		Q4	
		JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	Q1	Q2	Q3	Q4		
Policy on Harassment at Workplace	Published and circulated to the whole operating unit in Q3 2018.	█	█	█	█	█	█																		
	Socialisation and training of the new policy to all respective personnel, with involvement of local authorities such as the National Labour Department (JTK)																								

GHG Emissions

POLICY COMMITMENT:

- Implementation of programmes to progressively reduce GHG emissions, recycle/reuse palm biomass and generate renewable energy by methane capturing.

Identify baseline target for GHG emission reduction	Data collection from regional level in progress. Extension of timeline is needed to analyse the data collection from all operating units.	█	█	█	█	█	█	█																
Develop a transparent GHG reduction strategy for IOI, including clear saving targets.	GHG reduction plan document finalised. Extension of timeline due to lack of baseline data obtained from the ground.	█	█	█	█	█	█	█																
Monitor and report GHG emissions of IOI Group.	Format for GHG emissions data collection at respective operating unit is currently being standardised. The data will also be used for carbon accounting. Established data analysis in accordance with RSPO Palm GHG. Collaboration program with MPOB in progress.	<i>Ongoing</i>																						
Training and development to establish systematic reporting on operational GHG emissions	Conduct training on standardised GHG calculation and reporting system to the relevant personnel related to certifications in plantation operation.																							
Reduce GHG at all IOI mills through the installation of biogas capturing systems by 2020 (subject to new technologies).	1. Two biogas plants (for Pukin and Ladang Sabah) commissioned in 2014 and 2015.	<i>Completed</i>																						
	2. Started construction on three biogas plants and operation is expected to start in Q3 2018. (a) One of the biogas plants has commissioned and flaring in August 2018. (b) Another two biogas plants are expected to be completed in Q4 2018.	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█
	3. Two additional biogas plants will be constructed in April and July 2018 respectively, and are expected to be commissioned by 2019.																							



ACTIVITY/MILESTONE	STATUS PER SEPTEMBER 2018	2018		2019								2020							
		Q3		Q4		Q1		Q2		Q3		Q4		Q1	Q2	Q3	Q4		
		JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAC	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
	Fire Prevention Plan for Sabah Region In liaison with the Sabah Forestry Department team to assist in the revision of the initial fire prevention plan. Extension of timeline to Q4 2018 to finalize the document.																		
Upgrading internal capacity and training (annually) for 2018	Training on Fire Alert Information System and Rapid Response Plan was conducted for Peninsular Region.																		

Conservation

POLICY COMMITMENT:

- **Identification and protection of High Conservation Value (HCV) areas, no deforestation and protection of HCS areas.**

Capacity building programs for year 2018 to improve protection of High Conservation Value (HCV) areas, no deforestation and protection of HCS areas. Focus on the estates that are located in the two key landscapes (i) Ketapang and (ii) Kinabatangan.	Indonesia: Continuous training on SMART patrol to enhance knowledge for better patrolling and reporting																		
Capacity building programs in year 2018 include (i) orang utan survey and monitoring, (ii) HCS patches analyses for connectivity, (iii) modelling water table and zonation (peat swamp), (iv) forest classification for planning tree planting program (peat and natural forest), (v) tree mortality monitoring program.	Two-day Sepilok Orangutan Outreach conservation program was organised to raise awareness on wildlife and RTE species. Participants were from internal and external stakeholders in and around Unico grouping including staff and workers from neighbouring estates, villagers, as well as school children from SK Sri Ganda, Lahad Datu.																		
Agrochemicals (IMPLEMENTATION COMPLETED - end 2011)																			

POLICY COMMITMENT:

- **No use of Paraquat and pesticides that are categorised as World Health Organisation Class 1A or 1B.**

***Note: IOI's Agrochemical Management Policy was revised in July 2018 that states "The use of other Class 1 chemicals (such as metamidophos and monocrotophos) can only be carried out under strict supervision and absolutely necessary circumstances." Please click here for full document**
https://www.ioigroup.com/Content/S/PDF/agrochemical_mgmt_policy.pdf



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		Q3			Q4			Q1			Q2			Q3		Q4		Q1	Q2	Q3	Q4		
		JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC				
Adoption and implementation of Ketapang Landscape project.	Completion of preparation to adopt and implement the Ketapang Landscape project. Commencement of Ketapang Landscape project in October 2018																						

KPAM

POLICY COMMITMENT:

- We commit to using the HCS Approach for our last wholly unplanted concession, KPAM.

Undertake HCS assessment, utilising the latest HCSA converged methodology, by approved HCSA practitioner. This will contribute to the programme of field trials for HCSA.	HCSA report was successfully reviewed and passed. It was published by the HCS secretariat on 14 May 2018.	<i>Completed</i>
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Peatland Rehabilitation (IMPLEMENTATION COMPLETED – Q2 2018)

POLICY COMMITMENT:

- We confirm our commitment to developing and implementing best practice on peatland remediation, restoration and where necessary, compensation measures, in our Ketapang development in West Kalimantan.

Fire prevention

POLICY COMMITMENT:

- We will develop and implement a fire prevention and rapid response programme, consisting of active measures to prevent fires in IOI's new developments and adjacent lands, and to respond rapidly to any fires if necessary. The peatland management plan will be an important factor in mitigating fire risk.

Fire prevention and mitigation programs within (including conservation areas) and around concessions for 2018.	Full time fire guards on duty throughout the plantation for duration of dry season. Preparedness of firefighting facilities on standby during dry season. Fire truck, truck mounted water tanks available, etc. Verification report on the hotspots detected by RSPO. Fire Watch submitted as per requirement by RSPO.																						
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ACTIVITY/MILESTONE

STATUS PER SEPTEMBER 2018

2018		2019								2020							
Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4				
JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC

TRACEABLE SUPPLY CHAINS

Traceability (IMPLEMENTATION COMPLETED – Q4 2017 with ongoing data reported in Palm Oil Dashboard)

POLICY COMMITMENT:

- Our goal is to ensure that all volumes of palm oil and palm oil fractions will be 100% traceable to mills by the end of 2016 while palm kernel oil volumes will be traceable to crushers by end 2016 and to the mills by end 2018; this will be extended towards 100% traceable to plantation by the end of 2020.

Supplier Engagement

POLICY COMMITMENT:

- We will actively promote and support the transformation of the palm oil supply chain through a process of supplier engagement. We will continue to engage with key suppliers to promote our policy commitments and build capacity of mills and supplier companies to ensure compliance.

Webinar/training on new policy requirements to all direct suppliers.	Capacity building workshops are ongoing in partnership with NGOs	Ongoing				
Review of all direct suppliers' sustainability commitments against IOI policy requirements.	Ongoing	Ongoing				
Group level risk review of upstream companies in IOI supply base.	Review and appointment of new service provider					
Continuous Supplier Engagement in order to collaborate on prioritisation of interventions such as verification.	To review result of T4T platform by TFT and schedule workshops					
Review and engage with large suppliers on their practices with respect to peatlands on their plantations.	To review result of T4T platform by TFT and schedule workshops					
Develop guidelines for suppliers on requirements for HCV and HCS areas.	To review result of T4T platform by TFT and schedule workshops					



ACTIVITY/MILESTONE	STATUS PER SEPTEMBER 2018	2018		2019								2020							
		Q3		Q4		Q1		Q2		Q3		Q4		Q1	Q2	Q3	Q4		
		JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
Risk Assessment (IMPLEMENTATION COMPLETED – Q4 2017 with Ongoing data reported in Palm Oil Dashboard)																			
POLICY COMMITMENT:		<ul style="list-style-type: none"> We will risk assess all palm oil supplier mills using tools such as the spatial data and remote sensing information made available by the World Resource Institute’s (WRI) Global Forest Watch (GFW) platform, together with stakeholder alerts, in order to facilitate monitoring of the palm oil supply chain to establish priorities for conducting mill-level verification assessments. 																	
Mill Verification & Monitoring																			
POLICY COMMITMENT:		<ul style="list-style-type: none"> We are implementing a programme of mill-level verification assessments within our supplier base, in order to verify compliance with our Sustainable Palm Oil Policy. We expect all our third-party suppliers of palm oil products to adhere to commitments in this Sustainability Policy. 																	
Minimum 10 new mill assessments a year with implementation partner.	Utilising T4T to establish baseline of supply chain on NDPE for next 12 months																		



ACTIVITY/MILESTONE	STATUS PER SEPTEMBER 2018	2018				2019				2020																			
		Q3 JUL	Q3 AUG	Q4 SEP	Q4 OCT	Q4 NOV	Q4 DEC	Q1 JAN	Q1 FEB	Q2 MAR	Q2 APR	Q2 MAY	Q2 JUN	Q3 JUL	Q3 AUG	Q3 SEP	Q4 OCT	Q4 NOV	Q4 DEC	Q1 JAN	Q1 FEB	Q2 MAR	Q2 APR	Q3 MAY	Q3 JUN	Q4 JUL	Q4 AUG	Q4 SEP	Q4 OCT

TRANSPARENCY AND WIDER ENGAGEMENT

Plantation and Concession Maps (IMPLEMENTATION COMPLETED – Q1 2017)

POLICY COMMITMENT:

- Making maps of all IOI plantations publicly available, subject to any legal restrictions.

Grievance mechanism (IMPLEMENTATION COMPLETED – Q4 2016)

POLICY COMMITMENT:

- Improving IOI Group’s complaints handling capacity and procedures and implementing a comprehensive grievance procedure covering our palm oil production and sourcing.

IOI - Pelita Sarawak

POLICY COMMITMENT:

- An open and transparent approach to resolving outstanding grievances with the involvement of affected stakeholders, including successfully concluding the mediation process with the affected longhouse communities in Sarawak, to the satisfaction of all parties.

Conduct meetings with affected communities in the presence of <i>Residen</i> of Miri (Governor) to discuss land /land use offers to settle dispute-	Completed	<i>Completed</i>			
To continue socialization of the draft Resolution Plan until all 9 affected communities give their consent for the implementation of the plan.	<ol style="list-style-type: none"> As of 30 September, 6 out of 9 communities have given their consent for the Resolution process to move forward. The remaining 3 asked for more time so that their political mentors can advise them and give their endorsement for the draft Resolution Plan. A trip to Miri, Tinjar and Kuching, is scheduled from 3-9 October 2018. There will be a meeting between Stakeholder Engagement team, all community leaders, JOAS, (a local NGO), Pelita and also the government representative including Datu Dr Penguang Manggil, Asst. Minister for Local Government, Mr Nyurak Ketu, Deputy Resident of Miri, Dato Sri J.C. Fong, Legal Counsel for State 				



ACTIVITY/MILESTONE	STATUS PER SEPTEMBER 2018	2018		2019								2020							
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		JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAC	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
	Government of Sarawak, Alexander Asing, Secretary to Chief Minister of Sarawak and obtained advice and strong support from all of them.																		
Conduct CSR activities for the local communities in the IOI-Pelita landscapes.	1. A sum of contribution from IOI is scheduled to be given to the Berawan communities on 6 October 2018 for ground levelling job for the church construction.																		
Continues on more effective communication with external stakeholders	1. On 31 July 2018, IOI published an update on socialisation programme which was conducted from 1-7 July 2018 with the presence of RSPO and Grassroots representatives. 2. On 12 September 2018, we published an update on facilitation and capacity building for the benefit of community leaders which was attended by local NGOs and the Lead Facilitator, Dr Ramy Bulan.																		

Sustainability Advisory Panel (SAP)

POLICY COMMITMENT:

- Follow a multi-stakeholder approach as the right way forward to transform the palm oil sector. We will work with various stakeholders including our suppliers, customers, non-governmental organisations (NGOs), governments and independent verification bodies to implement our Policy.

SAP to meet regularly	SAP meeting will be held in conjunction with RSPO RT16 in Kota Kinabalu, Sabah	Ongoing																	
Independent verification of IOI's sustainability commitments	SAP member discussed and reviewed the verification process.	Ongoing																	

HCS Convergence (IMPLEMENTATION COMPLETED – Q2 2017)

POLICY COMMITMENT:

- Follow a multi-stakeholder approach as the right way forward to transform the palm oil sector.



ACTIVITY/MILESTONE	STATUS PER SEPTEMBER 2018	2018		2019								2020							
		Q3		Q4		Q1		Q2		Q3		Q4		Q1	Q2	Q3	Q4		
		JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAC	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
Sustainability Public Reporting																			

POLICY COMMITMENT:

- **Launching a public reporting system (company dashboard) to communicate traceability information, progress on resolution of outstanding complaints and updates on supplier engagement and verification.**

Palm oil dashboard update	To be updated for Q3 2018 by end of October 2018.																		
Website revamp IOI Group official website will be totally revamped to provide better accessibility and ease of navigation to the mass public.	1. Finalising design and website structure 2. Draft website to be reviewed before going online																		
Preparation and publication of Annual Sustainability Reporting 2018 based on GRI standard	1. Data collection and preparation of draft. 2. Publication of Sustainability Report 2018 available here http://www.ioigroup.com/Content/NEWS/PDF/sustainability_report.pdf	<i>Completed</i>																	

POLICY COMMITMENT:

- **Transparently report on progress by IOI Group on compliance with this Policy on a quarterly basis and additionally as needed.**
- **Policy and Implementation Milestones for IOI Group May 2017:** Publish and seek input on the methodology that IOI plans to use to conduct “an independent verification of the implementation of its Sustainable Palm Oil Policy, and the commitments stated above, in the second quarter of 2018.”

Verification on SIP commitments	IOI appoints Proforest to undertake an external verification of the implementation of IOP's Sustainable Palm Oil Policy (SPOP) and related commitments.	<i>Completed</i>																	
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ACTIVITY/MILESTONE

STATUS PER SEPTEMBER 2018

	2018												2019												2020							
	Q3						Q4						Q1				Q2				Q3				Q4							
	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC		
Work on the verification in in progress through a combination of external and internal stakeholder consultation, desk-based analysis and fieldwork. Phase 2 verification expected to commence end of November 2018.																																

30 OCTOBER 2018