Use It First, Accident Later

Neglect, Compromises in OHS Standards, and Worker Fatigue behind the High Occupational Accident Rate in the Morowali Nickel Industry

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About FPE KSBSI:

Federation of Mining and Energy (FPE) is a trade union that focuses on the mining and energy sector in Indonesia. FPE was formed on April 30, 1998, and affiliated with the Confederation of All Indonesian Trade Unions (KSBSI) at the national level, as well as with IndustriALL at the international level. FPE members are spread throughout Indonesia, including various energy industries such as oil, gas, geothermal, coal, nickel, gold, power plants, and gas stations.

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Foreword

"Just use it first" is a sentence that is frequently used by supervisors in the Indonesia Morowali Industrial Park (IMIP) area to the workers during their daily work. We were quite tickled when we heard the sentence was uttered in the interview we conducted with workers at IMIP. We may have often heard this simple sentence in our daily life, or even use it when weighing whether to replace something or not. For example, is it necessary to buy new, trendy shoes or stick with the old, worn-out shoes that are still comfortable? However, the sentence becomes less enjoyable when applied to a professional work context, particularly when using tools that can compromise worker safety.

The lives of workers in the IMIP area are not like assets or investments that can be weighed against costs and benefits in order to maintain company productivity and operational costs. Even more ironic, the workers recounted their experiences of accidents or near-accidents with laughter, as if this were a common thing.

The explosion at the PT ITSS (Indonesia Tsingshan Stainless Steel) smelter on December 24, 2023, which resulted in 21 fatalities and 38 severe burns, remains fresh in our memories. According to the report written by Sembada Bersama Indonesia, the chronology of the explosion was triggered by a work order to expedite the repair of furnace smelter number 41, as well as negligence by the supervisor in failing to anticipate the previously reported damage to the smelter wall. This incident should have served as a wake-up call for the IMIP area to evaluate the implementation of security and Occupational Health and Safety (OHS) procedures among their tenants. However, in the following months, we have continued to hear about work accidents at the IMIP area resulting in fatalities.

This study seeks to uncover the underlying causes of the high rate of workplace accidents in the IMIP industrial area, which has drawn ongoing criticism from media outlets and NGOs due to poor and unsafe working conditions. To gain a comprehensive understanding, a survey was conducted involving 348 workers from the IMIP area during May–June 2024, providing a general picture of the safety conditions experienced by employees.

In addition, focus group discussions and in-depth interviews were carried out to further explore daily OHS challenges faced by workers. By analyzing these findings from multiple perspectives, the study aims to contribute to tangible

improvements in working conditions within IMIP and help prevent further tragedies like the fatal explosion on December 24, 2023.

By using a survey method that collects answers from 348 respondents who are workers in the IMIP area in May–June 2024, we can gain a general understanding of the safety conditions faced by workers. Next, we employ a focus group discussion method with representative workers in the IMIP area, as well as in-depth interviews with several workers, to gain a deeper understanding and capture unique experiences related to OHS problems in their workplace.

From the three data collection methods, we identified several recurring patterns contributing to the high rate of workplace accidents in the IMIP area. Four main factors were found: (1) human error, including worker negligence, (2) hazardous work environments, (3) inadequate personal protective equipment (PPE), and (4) equipment malfunctions.

These indicate serious shortcomings in the implementation of the existing OHS system, largely due to weak enforcement and supervisory neglect. Additionally, strained relations between foreign and local workers further weaken the OHS culture. Beyond these four primary factors, our research also identified other contributing risks, including worker fatigue resulting from excessively long working hours and the hidden threat of occupational diseases. Moreover, female workers face gender-specific challenges due to the male-dominated workforce in the IMIP area, highlighting the need for more inclusive and responsive workplace policies.

The issues outlined above prompt a critical question: why do workers in the IMIP area appear powerless to resist these exploitative conditions? Our findings point to three key factors that perpetuate this cycle of exploitation: (1) economic pressure and imbalanced power relations, (2) horizontal tensions and weak social dialogue, and (3) low union density, which has led to the fragmentation of labor unions within the IMIP area. These factors highlight the urgent need for a stronger strategic alliance among unions and collective action to reinforce the area's Collective Bargaining Agreement (CBA), ensuring it is upheld as a set of binding "Golden Rules" for all tenant companies.

Source: Confidential

IMIP and the High Rate of Occupational Accidents in Morowali

> “Workplace accidents in the IMIP area are often attributed to worker negligence. Whether resulting from supervisors’ orders or individual mistakes, it is the workers occupying the lowest positions in the hierarchy who bear the consequences. The weak implementation of safety culture and OHS standards is further exacerbated by supervisory negligence. Moreover, the disharmonious working relationship between foreign and local workers has worsened the situation, leaving workers lost in translation and confused.”

Use It First, Accident Later: Neglect, Compromises in OHS Standards, and Worker Fatigue behind the High Occupational Accident Rate in the Morowali Nickel Industry

The global transition toward renewable energy is often seen as a crucial step in mitigating climate change. With the goal of limiting the rise in global temperature to 1.5°C above pre-industrial levels by the end of this century, reducing the use of fossil fuels in energy generation—such as in power plants, transportation, construction, and building maintenance—has become imperative, as these sectors account for 75.7% of global carbon emissions (Ge et al., 2024).

Reducing coal use will inevitably impact the current coal industry, but it also drives growth in emerging sectors, such as electric vehicles (EVs). The rapid expansion of the EV industry has significantly increased the demand for nickel, a key component in EV batteries and renewable energy storage.

Over the past decade, Indonesia has emerged as the world's largest producer of nickel, accounting for 55% of global battery-grade nickel production, with major downstream processing facilities located in Morowali, Obi Island, and Weda (Home, 2024).

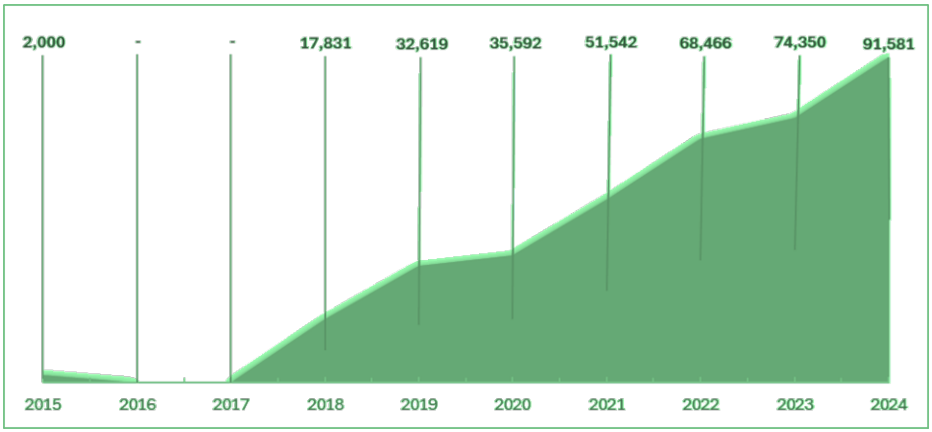
Global efforts to drive the energy transition have positioned Indonesia as a key battleground in the EV supply chain. The importance of this sector in the country's development agenda is evident in the government's designation of nickel industry projects as National Strategic Projects or *Proyek Strategis Nasional* (PSN). This designation offers companies various advantages, including tax exemptions, streamlined business licensing, expedited environmental and land-use permits, and protections to ensure operational stability (Widodo & Yujana, 2023).

While these investments contribute to regional economic growth, they also raise concerns about labor conditions, environmental degradation, and the socio-economic impacts on local communities (Widi, 2024). The implementation of PSN in the nickel industry along with its lax regulations has been criticized as a key factor behind the rise in workplace accidents.

The Indonesia Morowali Industrial Park (IMIP) is located in Bahodopi District, Morowali Regency, Central Sulawesi. Established in 2013, its development began with a memorandum of understanding signed by President Susilo Bambang Yudhoyono in 2014, followed by the official launch of operations by President Joko Widodo in 2015. Since its initial operation, the number of workers in IMIP has grown significantly—from 2,000 in 2015 to 91,581 in 2024. This figure excludes approximately 11,615 foreign workers from China, bringing the total workforce in the area to 103,196 (Maulana, 2024) (Graphs 1.1).
Most Indonesian workers at IMIP are young, under the age of 35, with 93% originating from Sulawesi and 7% from other islands (Detik, 2024). Notably, only 9% of the total workforce are native to Morowali and hold local identification cards (Departemen Eksternal PT IMIP Site Morowali, 2023), meaning the vast majority of workers reside in rented accommodations outside the industrial area.

Unlike Indonesian workers, Chinese foreign workers or *Tenaga Kerja Asing* (TKA) at IMIP are provided with on-site dormitory facilities and are generally not allowed to leave the industrial park freely. This restriction is part of an agreement between IMIP management and the Morowali Regency government aimed at minimizing potential cultural clashes that could lead to unwanted incidents (Gumilar, 2022).

While some companies permit foreign workers to leave the area, they must be accompanied by security personnel and, when necessary, a translator (Gumilar, 2022). The IMIP workforce is also predominantly male, with approximately 92% of workers being men and only 8% being women (PT. Indonesia Morowali Industrial Park, 2024). This significant gender imbalance places female workers in a more vulnerable position, exposing them to a higher risk of experiencing various forms of workplace violence.



Graph 1.1: : Indonesian Workers in IMIP Area (2015 - 2024)*
***Notes:** *There is no publicly available data on workers in 2016 and 2017.*
Source: Compiled from various statements of PT Indonesia Morowali Industrial Park.

Currently, approximately 11 trade unions are present within the IMIP area, nine of which are affiliated with the ASPIRASI coalition. These include the Federation of Blue Collar Workers–All Indonesian Workers Union (FSP KB–SPSI), National Workers Union (SPN), Morowali Industrial Workers Union (SPIM), Sulawesi Mining Investment Factory Workers Union (SP–SMIP), Federation of Indonesian National Trade Unions (FSPNI), Federation of Energy and Mining Health Industries (FIKEP–SBSI), Metal Workers Union (SPL–FSPMI), Morowali Indonesia Industrial Labor Union (SBIMI), and the Cendana Morowali Workers Union (SPCM) (KSPSI News, 2023). In addition to these, there are two unions that operate outside the coalition: the Federation of Mining and Energy (FPE–KSBSI) and the Mining Industry Labor Union (SBIPE).

Despite the presence of numerous unions, only an estimated 10,000 workers or approximately 11% of the total workforce in the IMIP area are registered as union members. This low rate of union participation presents a persistent challenge for labor organizations seeking to expand its membership and strengthen worker representation in the region.

Unfortunately, the rapid development of the IMIP area is also accompanied by an increase in the number of work accidents in the area. According to Permenaker No. 5 of 2021, work accidents are defined as accidents that occur in the course of employment, whether on the way to work or from work, as well as diseases caused by the work environment.

Companies	Data Period	Number of Accidents	Injured	Deaths
Indonesia Morowali Industrial Park (IMIP)	2016 - 2023	25	82	39
Huadi Nickel Alloy Indonesia (HDNI)	2020 - 2023	6	3	3
Virtue Dragon Nickel Industry (VDNI)	2015 - 2023	9	-	7
Gunbuster Nickel Industry (GNI)	2020 - 2023	10	3	8
Indonesia Weda Bay Industrial Park (IWIP)	2021 - 2022	9	18	4
Total		56	106	61

Table 1.1: List of Accident Rates in the Indonesian Nickel Industry 2015 - 2023
Source: Hasiana, D. (2024, September 27). Ministry of Manpower reveals data on nickel smelter disaster: 61 Killed, IMIP Most - Energy. Bloombergtechnoz.com; Bloomberg Technoz.

According to data from the Ministry of Manpower, between 2015 and 2023, a total of 59 workplace accidents occurred in the nickel industry, resulting in 61 fatalities and 106 injuries (Hasiana, 2024) (Table 1.1). Within the IMIP area alone, from 2016 to 2023, there were 25 workplace accidents, leading to 39 deaths and 82 injuries.

The most severe incident occurred on December 24, 2023, when furnace number 41 at PT. Indonesia Tsingshan Stainless Steel (ITSS) in Morowali exploded, killing 21 workers and seriously injuring at least 38 others (Hamdan, 2024). The explosion was reportedly caused by a violation of standard operational procedures (SOP), which supervisors instructed workers to bypass in order to resume production quickly (Sembada Bersama Indonesia, 2024).

Tragically, despite this major incident, workplace accidents in the IMIP area have continued. Less than a month later, on January 19, 2024, an overflow of

slag—or waste residue—from the furnace at PT. Sulawesi Mining Indonesia (SMI) caused a fire, resulting in two workers being evacuated and receiving medical treatment (Hamdan, 2024b). Then, on June 13, 2024, another workplace accident occurred at a nickel ore refining furnace at PT. ITSS, in which two workers suffered serious burns (Yunus & Yogatama, 2024).

IMIP management denied that the accident was caused by an explosion, instead attributing it to worker negligence. In their official statement, IMIP claimed the incident happened during the smelter cleaning process, when a worker attempted to cool molten steel slag prematurely by pouring water on it, creating steam that caused burn injuries (Febriani, 2024).

Several documented cases underscore the tendency to attribute workplace accidents at PT IMIP primarily to worker negligence. Whether resulting from supervisor directives or individual errors, the burden of these incidents disproportionately falls on the yellow-helmet workers—workers occupying the lowest tier of the formal labor hierarchy within the IMIP complex.

Figure 1.1 Incidence of work accidents due to overload,
Source: Confidential

Numerous media sources and studies by non-governmental organizations (NGOs) focused on the nickel downstream industry have identified critical factors contributing to the high incidence of OHS violations.

Tempo magazine highlighted the lack of effective OHS oversight in nickel smelting operations in Morowali, a responsibility often neglected by the local Manpower Office (Sulistyowati, 2023). Rasamala Hijau Indonesia and Sembada Bersama Indonesia reported that prolonged working hours have led to cumulative fatigue and diminished concentration among workers (Sembada Bersama Indonesia, 2024; Widi, 2024). Similarly, Mongabay noted that the personal protective equipment (PPE) provided was not only inadequate in quality but also insufficient in quantity (Rivai, 2023). In addition, the Yayasan Tanah Merdeka attributed the frequency of accidents to the relentless pursuit of production targets imposed on workers (Dhika, 2016).

This report utilizes data that, to a certain extent, aligns with that used in previous studies. As a result, there may be similarities in the findings. However, this research employs a different sample population, with the intention of offering a broader and more nuanced perspective on how workers within the IMIP area perceive the high incidence of OHS accidents in their workplace.

How This Report is Written?

This report centers on a key research question: What factors contribute to the high incidence of workplace accidents at IMIP? To explore this question, a mixed-methods research design was adopted, combining quantitative and qualitative approaches to offer a comprehensive analysis of workers' experiences and the challenges they face. This approach was chosen to provide both breadth and depth in examining OHS issues within the nickel industry sector.

Table 2.1: Number of Respondents, Average Length of Service, and Average Age

Companies	Total Respondent	Average Length of Service	Average Age
PT. Dexin Steel Indonesia	66	4.2	29.9
PT. Indonesia Guang Ching Nickel and Stainless Steel Industry	58	3.3	27.9
PT. Indonesia Morowali Industrial Park	32	3.1	24.6
PT. Indonesia Ruipu Nickel and Chrome Alloy	44	4.2	31.1
PT. Indonesia Tsingshan Stainless Steel	10	4.3	29.8
PT. Lestari Smelter Indonesia	34	4.4	30.3
PT. Qing Feng Ferro Chrome	16	1.8	31.1
PT. QMB New Energy Materials	14	1.2	27.4
PT. Risun Wei Shan Indonesia	28	1.6	29.1
PT. Walsin Nickel Industrial Indonesia	46	4.7	29.1
Grand Total	**348**	**3.6**	**29.2**

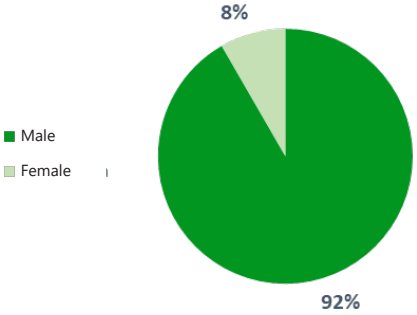


Chart 2.1: Gender Percentage

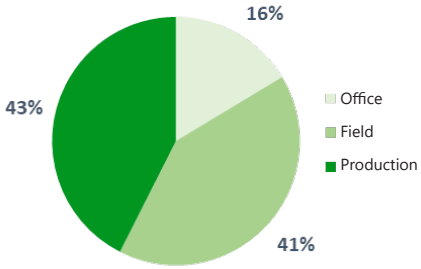


Chart 2.2: Work Location Percentage

- **Survey:** The quantitative component involved a survey conducted between May and July 2024, targeting 348 workers across 10 companies operating within the IMIP area (Table 2.1). The survey sought to capture workers' perceptions of OHS policies, workplace conditions, and their experiences with occupational incidents. Participants were selected through random sampling, ensuring that the sample was not limited to members of specific labor unions, thereby enhancing the representativeness of the data. The findings from this survey provided a foundational overview that informed subsequent qualitative inquiry, which included Focus Group Discussions (FGDs) and in-depth interviews aimed at gaining deeper insights into the systemic factors underlying the high rate of work-related accidents.

- **Focus Group Discussion (FGD):** In December 2024, a series of FGDs were conducted with workers from the Morowali region. These sessions provided a platform for participants to share their perspectives, express grievances, and identify systemic challenges related to OHS practices. The discussions also served to explore collective experiences and potential strategies for improving workplace safety conditions.

- **In-depth Interviews:** To gain more nuanced insights, in-depth interviews were conducted with workers who had either directly experienced OHS-related incidents or were actively involved in OHS roles. These interviews were designed to elicit detailed personal narratives, allowing for a deeper understanding of the root causes of OHS violations as well as the coping mechanisms workers adopt in response to hazardous conditions.

- **Triangulation:** To enhance the validity and reliability of the research findings, data from the survey, FGDs, and in-depth interviews were analyzed through a triangulation process. This methodological approach enabled the identification of recurring patterns, the corroboration of findings across sources, and the mitigation of potential biases in data interpretation.

Through this process, four primary factors were identified as contributing to the high rate of occupational accidents in the IMIP area: (1) human factors, such as worker negligence; (2) unfavorable workplace environmental conditions; (3) inadequate personal protective equipment (PPE); and (4) the use of damaged or poorly maintained equipment. These findings reflect serious shortcomings in the implementation of the existing OHS system, largely stemming from inadequate enforcement and supervision. Additionally, strained working relationships between foreign and local workers were found to weaken the already fragile safety culture further.

Beyond these four factors, the study also revealed that accumulated worker fatigue due to excessively long working hours and the hidden dangers of occupational diseases significantly increase the risk of workplace incidents. Female workers face further challenges, often specific to their gender, as a result of being significantly outnumbered in the male-dominated workforce of the IMIP area, compounding their vulnerability in terms of safety and overall well-being.

Source: Confidential

Just Use It First, Work With It First : Normalizing Occupational Risk

> “We identify a key theme concerning the persistent reluctance among both management and workers to fully adhere to OHS culture. Field supervisors and management primarily focus on productivity, often leading to the de-prioritization of SOPs. On the other hand, workers’ accumulated fatigue from long working hours causes them to lose focus and take shortcuts in their tasks to compensate for their lack of rest.”

The statement "just use it first" reflects a common aspect of daily life, where many individuals adopt a frugal living mindset by continuing to use goods and equipment beyond their optimal performance. While this approach may be practical in domestic settings, it becomes highly problematic when applied in the workplace—especially when worker safety is at stake. Unfortunately, this is precisely the reality faced by many workers in IMIP, where such cost-saving practices often compromise occupational health and safety standards in their daily operations.

According to records from the Ministry of Manpower, between 2015 and 2023, at least 61 fatalities occurred as a result of work-related accidents across Indonesia's five primary nickel refining regions. Among these, the Indonesia Morowali Industrial Park (IMIP) recorded the highest number of incidents, with 25 accidents resulting in 39 deaths and 82 injuries (Hasiana, 2024). Alarmingly, in 2024 alone, three additional work-related accidents and one gas leak were reported at PT Merdeka Tsingshan Indonesia (MTI), with the latter incident resulting in 40 workers experiencing dizziness and respiratory distress.

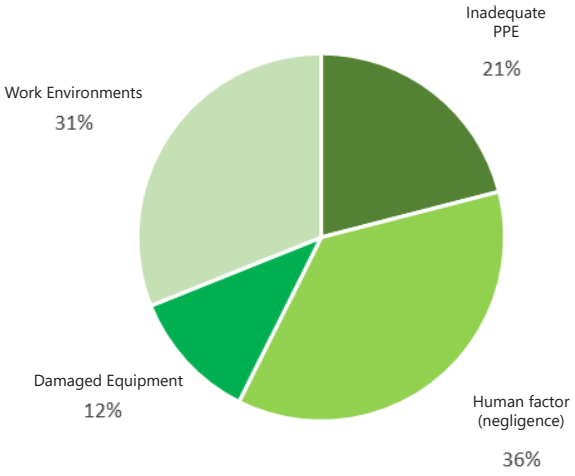


Chart 3.1: Percentage of Causes of Work Accidents in the IMIP Area

The high number of work-related accidents in the IMIP area has become a matter of public knowledge. Findings from the survey reveal that 85% of respondents reported either experiencing or witnessing a workplace accident, underscoring how normalized such incidents have become in the area. Based on respondents' accounts, the causes of these accidents were grouped into four main contributing factors. The results indicate that 36% of respondents identified human error—including worker negligence—as the primary cause. Additionally, 31% cited an unsafe or inadequate work environment, 21% attributed accidents to insufficient personal protective equipment (PPE), and 12% pointed to equipment malfunctions as the main contributing factor **(Chart 3.1).**

Table 3.1: Percentage of Occupational Accidents and Accident Rates

Factors	Light	Heavy	Deaths	Total
Inadequate PPE	76%	17%	7%	100%
Human factor (negligence)	71%	20%	9%	100%
Damaged equipment	33%	41%	26%	100%
Work environments	77%	16%	7%	100%
Total	70%	21%	10%	100%

On human factors, the data indicate a consistent pattern of individual-level errors during task execution. These errors encompass negligence, insufficient attentiveness, haste, and inadequate communication among workers. Survey responses highlighted specific incidents such as falls from heights resulting from improper use of safety harnesses, scalding from hot water, injuries sustained while repairing machinery, and collisions involving workplace vehicles. Additionally, a recurring theme in the data is the connection between these errors and worker fatigue, which often leads to reduced concentration and the intentional circumvention of standard operating procedures (SOPs) to accelerate task completion or to cut corners.

The work environment also constitutes a significant factor in the occurrence of occupational accidents. Numerous respondents pointed to inadequate physical conditions and unsafe spatial arrangements within the workplace. These environmental deficiencies have resulted in frequent minor accidents, including slips on metal staircases or floors, falls into drainage culverts, and injuries caused by broken glass or exposed metal objects—often exacerbated by poor lighting.

Additionally, limited workspace has been identified as a contributing factor to vehicular accidents, particularly by dump truck drivers who reported difficulties in navigating tight areas, thereby increasing the risk of collisions. Although this category accounts for a considerable share of reported incidents, most have not resulted in serious injury or fatality. A notable exception is the fatal collapse of a dump truck unit during a landslide in the dumping area, which claimed the life of a worker.

The improper use of personal protective equipment, particularly when not aligned with the specific risks associated with certain job functions, also contributes significantly to occupational accidents in the IMIP area. Survey responses revealed several instances where inadequate or inappropriate PPE resulted in injuries, such as sparks entering workers' boots, low-quality masks that failed to protect production workers regularly exposed to coal dust and carbon monoxide fumes, and hand injuries caused by insufficiently thick gloves.

Another critical factor identified is the continued use of damaged or unfit equipment—a practice colloquially referred to as "just use it first." This issue was brought into sharp focus by the explosion of Furnace 41 at PT Indonesia Tsingshan Stainless Steel (ITSS) on December 24, 2023. The tragedy, which resulted in 21 fatalities, was traced back to the violation of safety SOPs when a furnace that had not been fully repaired was prematurely put back into operation. Although this factor was not the most frequently reported, it is

arguably the most dangerous due to the catastrophic consequences it can produce. Additional examples of equipment-related incidents cited in the survey include brake failures and injuries sustained during machine repairs involving faulty components.

While the use of damaged equipment can naturally be considered negligence on the part of the workers, we differentiate between the two by observing the element of direct or indirect work orders issued by the supervisor. In this context, we found that the phrase "use it first" can be seen as a deliberate act by the supervisor to instruct workers to perform work that could endanger their safety. In addition to the phrase "use it first," there are also phrases such as "please condition it," which have a dual meaning for workers: asking them to continue their work even when conditions are less than ideal and delegating responsibility for completing the work to the workers, regardless of the circumstances. This certainly creates an internal conflict for workers: on the one hand, they do not want to work in dangerous conditions, and on the other hand, they do not want to refuse work for fear of sanctions.

Risk Normalization: Allowed and Conditioned Process Violations

An analysis of the four identified factors contributing to workplace accidents reveals a unifying theme: a pervasive weakness in adhering to and internalizing a culture of OHS. Occupational safety cannot be attributed to a single cause but must be understood as an interconnected system of behaviors, procedures, and values that collectively shape workplace safety outcomes. In accordance with Indonesian regulations, [1] OHS is defined as *"...all activities undertaken to ensure and protect the safety and health of workers through the prevention of occupational accidents and occupational diseases."* This definition underscores the need to view the high incidence of accidents in the IMIP area not as isolated incidents resulting from discrete factors, but as manifestations of systemic shortcomings in the implementation of a comprehensive OHS framework.

[1] Government Regulation Number 50 of 2012 concerning the Implementation of the Occupational Safety and Health Management System

Human error, compounded by violations of SOPs—such as the use of damaged equipment—alongside a hazardous work environment and substandard personal protective equipment, significantly increases the risk of occupational accidents in the IMIP area. The persistent occurrence of such incidents highlights systemic deficiencies in oversight and enforcement of OHS protocols at the managerial level. These issues cannot be dismissed as isolated worker-level failures, as organizational factors and strategic approaches to safety management play a critical role in shaping workplace outcomes.

As Levenson (2017) emphasizes, safety systems and work structures are the result of deliberate organizational design and decision-making. Consequently, the responsibility for ensuring a safe working environment ultimately rests with the company, which must implement effective systems to prevent accidents and uphold the well-being of its workforce.

The responsibility of companies and the IMIP industrial complex in preventing workplace accidents must be assessed through two critical dimensions: regulation and implementation. While numerous OHS measures have been formally established—including SOPs, safety signage, and safety inductions—their practical enforcement remains inadequate. SOP violations are still frequently observed on site, often resulting in serious or even fatal consequences. Safety signage is commonly disregarded, not only by frontline workers but also by supervisors, reflecting a systemic lack of accountability. Safety inductions, which should serve as a foundational step in cultivating awareness of workplace hazards, are often reduced to a procedural formality with limited engagement or comprehension.

Moreover, safety trainings and refreshment for reinforcing safe practices are frequently deprioritized due to production demands. These examples suggest that organizational and regional efforts to promote OHS often stop at policy creation, lacking meaningful execution. The persistent gap between regulation

Figure 3.1 Incidence of workplace accidents
Source: Confidential

and practice indicates that safety has not yet been fully internalized as an organizational culture within IMIP. As a result, these OHS initiatives tend to function more as checklist requirements than as effective mechanisms to safeguard workers' well-being.

Other situations that can describe the poor implementation of OHS in the IMIP area include the frequent occurrence of vehicular accidents involving trucks and loaders. This occurs because many drivers do not have a Company Driving License (SIMPER) issued by the IMIP area, yet they continue to drive in the area. SIMPER should be a mandatory requirement for every driver operating within the area to ensure that they have sufficient competence and

understanding of the safety rules in the area[2] . Despite this, supervisors often instruct unlicensed workers to drive, and when accidents occur, the workers are blamed and penalized, revealing a lack of oversight and accountability. Further evidence of weak OHS enforcement is seen in the poor implementation of the Occupational Safety and Health Management System or *Sistem Manajemen Keselamatan dan Kesehatan Kerja* (SMK3).

Several OHS personnel reported that audits often rely solely on photographs without on-site verification, and routine inspections of equipment-which should be conducted yearly are irregular or absent. Additionally, some companies appoint foreign nationals as OHS supervisors, violating Minister of Manpower Decree No. 349 of 2019.

These practices indicate a superficial commitment to safety standards, prioritizing administrative compliance over actual workplace safety. The explosion of Furnace 41, along with growing public scrutiny of labor conditions in the nickel industry, has prompted some improvements in OHS practices within the IMIP area. While progress has been gradual, several companies have taken steps toward compliance.

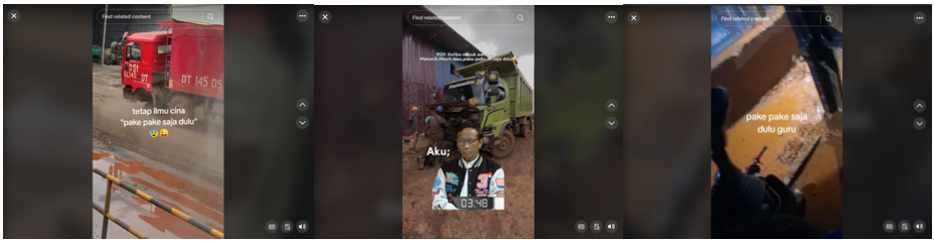


Figure 3.2: Screen Capture Example of "Just Use It First" that Occurs in the IMIP Area
Source: Screenshot from TikTok

[2] IMIP Area CBA Chapter VI. Work Regulations, Article 30. Occupational Safety and Health, Paragraph 15, Point (b).

As of November 2024, 23 out of the 51 companies operating in the IMIP area have obtained Occupational Health and Safety Management System certification (PT. Indonesia Morowali Industrial Park, 2024b). However, the majority remain uncertified, raising concerns about ongoing safety risks and the potential for undetected violations.

Violations of work procedures in the IMIP area often stem from a lack of commitment among both supervisors and workers to adhere to established safety regulations. When these violations go unnoticed, they are frequently ignored—or worse, actively encouraged—by supervisors using common phrases such as "just use it first", "please condition it", or "just get the job done." These expressions reflect the normalization of unsafe practices and the weak integration of an Occupational Health and Safety culture within the work environment. Over time, this culture of high-risk tolerance has become deeply embedded and even trivialized, as evidenced by social media posts that depict safety violations as humorous content **(Figure 3.2).** The normalization of these behaviors poses a serious threat to workplace safety and, if left unaddressed, will continue to result in preventable accidents.

The explosion of Furnace 41 serves as a stark reminder of the consequences of neglecting occupational safety protocols. This tragic incident could have been prevented had there been a strong commitment from all stakeholders to uphold safety standards and adhere to established Standard Operating Procedures.

According to the report by Sembada Bersama, multiple procedural violations occurred, including directives from foreign supervisors to expedite the repair process in order to meet production targets[3]. The repair work was carried out hastily and in direct violation of SOPs.

Workers were reportedly incentivized with the promise of bonuses for completing the task quickly and threatened with penalties if the process took

[3] For a complete explanation, see Sembada Bersama's report titled *"The Morowali Explosion; An Industrial Accident That Killed Workers in the Hearthland of the Nickel Industry."*

longer than one week. This pressure led to an unsustainable work pace, with employees working overtime for three consecutive days without rest. On the fourth day, Furnace 41 exploded, resulting in 21 fatalities.

It is essential to note that negligence in adhering to OHS standards is not universally observed among workers or supervisors. Interviews revealed instances where local OHS officers demonstrated a strong commitment to safety by refusing to grant work permits when safety requirements were not adequately met. However, these efforts were often met with resistance by the management.

In several cases, such officers were perceived as obstructing production and faced indirect punitive measures, including temporary suspension or the removal of their authority to conduct safety inspections. These responses underscore a concerning dynamic in which production targets are prioritized over worker safety, thereby undermining the institutionalization of a robust safety culture within the IMIP area.

Foreign and Local Workers, Lost-in-Translation?

Another issue identified through discussions with respondents regarding workplace accidents in the IMIP area is the lack of a harmonious working relationship between foreign and local workers. While this factor may not directly cause occupational accidents, it contributes to a work environment that can undermine effective communication and cooperation. Respondents expressed negative sentiments toward foreign workers, who often occupy supervisory roles over local employees. This tension appears to stem from several factors, including language barriers, perceived imbalances in job hierarchy, and deliberate segregation fostered by both government policies and regional management practices.

The abolition of the requirement for foreign workers to speak Indonesian [4]

[4] In Ministry of Manpower No. 10/2018, Article 31 Paragraph 1, the employer's obligation is to facilitate Indonesian language education and training except for certain jobs mentioned in Paragraph 2.

has further exacerbated communication gaps in the workplace, particularly in the IMIP area. As a result, foreign supervisors often rely on interpreters or spokespersons, which can hinder the effective transmission of critical safety information to both local and foreign workers. This communication barrier increases the risk of misunderstandings and misapplication of OHS protocols.

Furthermore, many local workers expressed concern that foreign supervisors tend to focus disproportionately on minor safety infractions—such as the improper fastening of helmet straps or the use of mobile phones in production zones—while neglecting more significant safety violations that, if properly addressed, could potentially disrupt production activities.

It is within these production-driven conditions that the phrase "just use it first" is frequently uttered by foreign supervisors. Initially, this statement seemed to appear to reflect a disregard for worker safety in favor of maintaining production targets. However, based on further analysis, it is also possible that this response stems from a lack of understanding—specifically, a language barrier that prevents foreign supervisors from fully comprehending local workers' safety concerns. This potential miscommunication highlights a deeper systemic issue: instead of seeking clarification or conducting follow-up checks to ensure workplace safety, foreign supervisors often respond with indifference, dismissing concerns without due consideration. This pattern reflects a failure to address communication gaps and reinforces a culture where safety is secondary to productivity.

Tensions between foreign and local workers at the IMIP site are evident not only in everyday interactions but also in the structural hierarchy of the workplace. Most foreign workers hold supervisory roles—such as foreman (blue helmet), supervisor (red helmet), or director (white helmet)—which inherently creates a communication barrier. Local workers often feel reluctant to engage with their superiors, particularly when those superiors are foreign nationals, due to a prevailing perception that Chinese supervisors are

figures of authority who should not be questioned. Even when Indonesian workers occupy positions of similar rank, many are hesitant to advocate for the concerns of their subordinates for fear of being labeled uncooperative, which could negatively impact their performance evaluations. Moreover, local managers who could act as intermediaries are often inaccessible due to heavy workloads, and in some cases, prioritize self-preservation over worker advocacy, with some exhibiting harsher treatment than their foreign counterparts.

Furthermore, segregation is also evident in the differences in facilities such as employee housing, food, and salaries between foreign workers and local workers, creating discomfort and strained working relationships between the two parties. These different facilities often make local workers feel like second-class citizens, which ultimately leads to dissatisfaction and social jealousy at work. As a result, beyond the work hierarchy, a social hierarchy is formed between foreign workers and local workers based on their ethnic backgrounds. If this cannot be mitigated subtly, there is a fear of friction that could lead to racial confrontations, such as the one that occurred in North Morowali in early 2023.

Segregated facilities have also indirectly widened the social distance between local and foreign workers. Local workers cannot freely interact with foreign workers outside of work. Similarly, foreign workers can only interact with Indonesian workers within the IMIP area. Efforts by the local government and area administrators to implement this segregation are intended to minimize cultural clashes. However, we observe that this practice is actually counterproductive, as the lack of interaction and transparency can raise suspicions on both sides.

Despite these systemic issues, not all foreign workers are dismissive of local concerns. Some have been reported to be highly responsive to requests for personal protective equipment and other safety needs, recognizing that

they, too, are vulnerable workers under the same industrial framework. As noted by China Labor Watch, many foreign workers in the IMIP area are also subjected to exploitative conditions, including forced overtime, passport confiscation, and restricted movement (Chan, 2023). The deteriorating working environment—impacting both foreign and local labor—has attracted international attention, contributing to Indonesian nickel's inclusion on the U.S. Department of Labor's list of products associated with forced or child labor (Hendrix, 2024).

Ultimately, the high incidence of workplace accidents in the IMIP area cannot be solely attributed to isolated factors such as equipment failure or human error. These are merely surface-level indicators of a deeper, systemic issue: the lack of organizational commitment to embedding a strong OHS culture. In the absence of such a culture, existing regulations remain largely performative. Furthermore, the strained relationship between foreign supervisors and local workers presents an additional layer of risk and inefficiency. Addressing these challenges requires a comprehensive, systemic approach—one that includes fostering social dialogue, promoting equitable working conditions, and institutionalizing safety as a core organizational value.

Moreover, beyond these four factors, other contributors to recurring accidents also need to be addressed—most notably, the issue of excessively long working hours. The physical and mental fatigue resulting from prolonged shifts significantly reduces workers' concentration and heightens the risk of negligence. In parallel, the shortage and poor quality of personal protective equipment introduce additional layers of danger.

These shortcomings not only lead to acute injuries but also increase the risk of long-term health conditions. The emergence of occupational diseases (OD) due to prolonged exposure to hazardous materials without adequate protection has added another dimension of concern, further highlighting the urgent need for a holistic and sustained commitment to improving OHS

standards in the IMIP area.

Long Working Hours with Occasional Break Every Now and Then

The division of working hours in the IMIP Area is formally outlined in the Area Collective Bargaining Agreement (CBA), signed in 2023 and effective through 2025. According to the agreement, work schedules fall into three main categories: Regular, 2 Shifts 3 Teams, and 3 Shifts 3 Teams. These are summarized in the table below:

Table 4.1: Division of Working Hours in IMIP Based on Area CBA

Type of Shift	In	Out	Break	Working Hours	Break Hours
Regular	7:00	17:00	11:30 - 13:30	8	2
	7:30	17:30	11:30 - 13:30	8	2
2 Shifts 3 Teams	7:00	19:00	11:30 - 13:30	10	2
	19:00	7:00	23:30 - 01:30	10	2
	6:00	18:00	11:30 - 13:30	10	2
	18:00	6:00	23:30 - 01:30	10	2
3 Shifts 3 Teams	7:00	15:00	-	8	-
	8:00	16:00	-	8	-
	15:00	23:00	-	8	-
	16:00	0:00	-	8	-
	23:00	7:00	-	8	-
	0:00	8:00	-	8	-

Source: IMIP Area CBA

While this division seems structured, there are major concerns. Most notably, field workers under the 3 Shifts 3 Teams schedule are not formally granted any break time, while most of them are field operators and mechanics. This contradicts national labor regulations[5] that mandates at least a 30-minute rest after four hours of work. Although the division of working time refers back to the agreed Company Regulation[6] or CBA, the existence of standards that are lower and contrary to this law should not be implemented. Even for those in Regular or 2 Shifts categories, the promised 2-hour break is often not honored in practice. Many workers shared that they are only permitted to take short

[5] Law Number 6 Year 2023, Article 79 paragraph 1.
[6] Law Number 6 Year 2023, Article 77 paragraph 4.

breaks (around 30 minutes for lunch) or are required to delay their rest until production tasks are completed.

The results of our survey also confirm other reports from NGOs that concluded how fatigue accumulation due to long working hours has become one of the main reasons for the high accident rate. From our survey, we found that the average working time in the IMIP area is 225 hours per month, equivalent to approximately 56 hours per week **(Table 4.2),** primarily due to mandatory overtime conditions agreed upon at the time of hiring. This excessive workload, combined with insufficient rest, leads to fatigue and reduced concentration—key factors that contribute to the high rate of work-related accidents in the IMIP Area.

Tabel 4.2: Average Working Hours and Overtime in IMIP Area

Companies	Avg. Overtime in a Week (Hours)	Total Working Hours in a Week (Hours)	Avg. Overtime in a Month (Hours)	Total Working Hours in a Month (Hours)
PT. Indonesia Morowali Industrial Park	16	56	64	224
PT. Indonesia Ruipu Nickel and Chrome Alloy	18	58	71	231
PT. Indonesia Tsingshan Stainless Steel	11	51	44	204
PT. Lestari Smelter Indonesia	18	58	70	230
PT. Qing Feng Ferro Chrome	12	52	49	209
PT. Dexin Steel Indonesia	18	58	74	234
PT. QMB New Energy Materials	11	51	44	204
PT. Risun Wei Shan Indonesia	21	61	85	245
PT. Walsin Nickel Industrial Indonesia	17	57	66	226
PT. Indonesia Guang Ching Nickel and Stainless-Steel Industry	15	55	59	219
Grand Total	**16**	**56**	**65**	**225**

The mandatory overtime system imposed on workers in the IMIP Area lacks legal grounding in Indonesian labor law. According to national regulations, overtime refers to working hours that exceed the standard—set at a maximum of 4 hours per day and 18 hours per week. Hence, by law, the average of total working hours carried out by workers at IMIP in a week is still counted within a maximum of 40 working hours and 18 hours of overtime per week[7].

While the law permits variations in working time through employment agreements, company regulations, or collective bargaining agreements[8], any

[7] Law Number 6 of 2023, Article 78 paragraph 1 point (b).
[8] Law Number 6 of 2023, Article 77 paragraph 1.

overtime must be voluntary and mutually agreed upon between employers and employees[9]. In practice, however, the mandatory overtime system in IMIP blurs this principle. Although workers' total hours—averaging 225 per month or roughly 56 per week—technically align with the maximum limit when combining normal and overtime hours, the nature of overtime in IMIP is rarely voluntary. Instead, it is embedded in individual employment contracts, effectively making it mandatory. This means workers are legally bound to comply with company-determined schedules from the moment they sign their contracts.

Notably, the IMIP Area's CBA does not explicitly mention a mandatory overtime system. It only distinguishes between normal working hours and overtime. It defines standard working time as either (1) 7 hours per day for 6 days a week, or (2) 8 hours per day for 5 days a week—both in line with the legal limit of 40 hours per week. Any time worked beyond this threshold is classified as overtime. However, the absence of clauses around mandatory overtime in the CBA creates a legal gray area that employers use to enforce extended working hours without proper oversight or worker consent.

Tabel 4.3: Example of Working Time Distribution with Mandatory Overtime System

	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday	Total Working Hours
Normal Working Hours	7	7	7	7	7	5	-	40
Mandatory Overtime	1	1	1	1	1	3	-	8
Total Working Hours	8	8	8	8	8	8	-	48

Source : Focus Group Discussion with IMIP workers

The practice of mandatory overtime in the IMIP area appears to be a strategic move by companies to increase labor productivity while minimizing the costs associated with hiring additional workers. While some companies claim to adopt a 7-hour workday system for six working days, the shift patterns listed in **Table 4.1** show no such allocation. All documented shifts indicate a minimum

[9] Law Number 6 of 2023, Article 77 paragraph 4.

of 8 working hours per day. This discrepancy suggests that the unaccounted hour is being systematically absorbed through overtime. Additionally, when only five hours remain in the standard schedule, an extra three hours are added under the overtime category. This arrangement enables companies to maintain a 48-hour workweek under the guise of a mixed regular and overtime schedule—despite the legal cap on normal working hours being 40 hours per week **(Table 4.3).**

This manipulation highlights how existing labor regulations are being bypassed through strategic reinterpretation. By integrating overtime into the routine work schedule, the distinction between regular hours and overtime becomes obscured. The legitimacy of mandatory overtime is further questioned when viewed through the lens of national labor law, which stipulates that overtime work must be performed only with the worker's consent.[10] However, with the new manpower law eliminating the obligation to issue an Overtime Order document,[11] employers are provided greater flexibility to impose additional hours, under the rationale that these were agreed upon in the original employment contract.

Such conditions create a situation in which workers are bound to extended work hours without the opportunity to opt out. Even after completing their official shifts, workers are often not permitted to leave the work environment. While wage slips may differentiate between standard pay and overtime, this practice tends to blur workers' understanding of what constitutes regular versus excess hours. As a result, excessive working hours are increasingly normalized among the workforces.

Worker fatigue is further exacerbated by irregularities in shift transitions and rest scheduling. In some cases, workers are required to return to work within a 24-hour window of their scheduled weekly rest. For example, a worker on a 3-shift 3-team rotation may begin a shift at 23:00 on Saturday and finish at

[10] Law Number 6 of 2023, Article 78 paragraph 1 point (a).
[11] Regulation Ministry of Manpower and Transmigration No. KEP. 102/MEN/VI/2004 Article 6

07:00 on Sunday, only to be asked to return at 00:00 on Monday—effectively allowing fewer than 18 hours of rest between consecutive work periods. This scheduling system, which measures shift days based on the time a shift begins rather than ends, creates ambiguity in rest day compliance.

Although the law mandates one day of rest for every six working days, it does not clearly define the required minimum number of rest hours[12]. This gap allows companies to exploit legal gray areas, undermining workers' physical recovery and well-being. Hence, to ensure adequate rest and prevent exploitation, it is necessary to revise the CBA by explicitly defining rest time in hourly terms. This approach would help safeguard workers from physically unsustainable shift cycles and mitigate risks associated with fatigue.

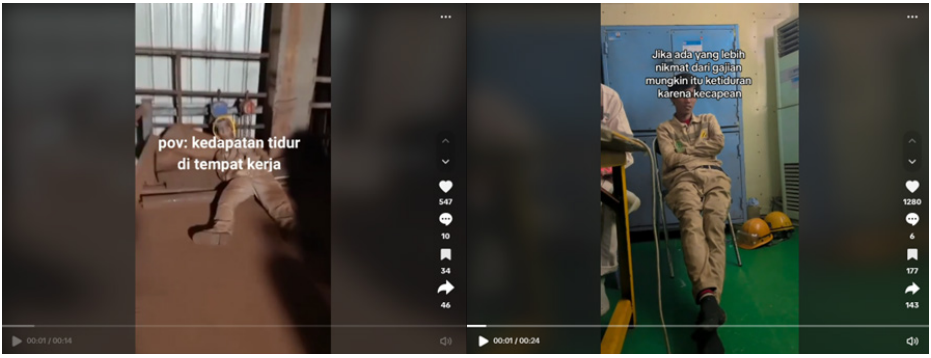


Figure 4.1: Example Screenshot of *Micro-Sleep* Occurring in the IMIP Area
Source : Catch screen from TikTok social media

Fatigue caused by extended and continuous working hours has been directly linked to increased workplace accidents. One of the most dangerous manifestations of fatigue is micro-sleep—a sudden and involuntary episode of sleep that occurs during moments requiring alertness. Reports from workers interviewed in the field reveal that micro-sleep is a common occurrence, with some incidents happening while operating heavy machinery. In one serious

[12] Law Number 6 of 2023, Article 79 paragraph 2.

case, a dump truck operator experienced micro-sleep while driving, resulting in the vehicle veering off a cliff. Fortunately, the accident did not result in fatalities, but it serves as a stark warning of the dangers posed by prolonged fatigue **(Figure 4.1).**

These risks tend to intensify during night shifts, early mornings, and the final hours of extended work periods. Research indicates that these times coincide with the body's natural circadian lows and reduced alertness, particularly after prolonged physical or mental exertion (Mustard et al., 2012). When compounded by inconsistent scheduling and limited rest, these factors significantly increase the likelihood of accidents in high-risk industrial environments such as the IMIP area.

In conclusion, the persistent trend of work accidents in the IMIP area underscores the urgent need for systemic reform in labor management practices. Excessive working hours, added by ambiguous distinctions between regular and overtime work which largely shaped by employer-defined schedules, and the absence of mechanisms for workers to opt out of mandatory overtime have created an environment where worker fatigue and safety risks are normalized.

These practices reflect a broader pattern of maximizing productivity at the expense of worker well-being, operating within regulatory gray areas. To break this cycle, it is essential to establish clearer, enforceable standards for working time, ensure proper rest periods, and prioritize occupational health and safety over production targets. Without meaningful changes, work accidents will continue to be seen as inevitable, rather than as preventable outcomes of an exploitative labor system.

Source : PT IMIP website

Working in the Shadow of Occupational Diseases

> “Workers lack an independent mechanism to report suspected occupational illnesses without the company’s consent, as doing so requires an inspection of their work environment. The current regulatory emphasis on the employer’s role in reporting suspected occupational illnesses further discourages workers from filing such reports.”

Occupational safety concerns in the IMIP area extend beyond acute workplace accidents and reveal a deeper, chronic threat posed by occupational diseases (OD). One of the most persistent issues contributing to this threat is the inadequacy of personal protective equipment (PPE), which has been consistently highlighted in previous reports as well as in the findings of our survey. According to the survey results, approximately 21% of work-related accidents were linked to problems with PPE, signaling not only a failure in immediate protective measures but also a potential gateway to long-term health complications. Interviews with workers reveal two recurring complaints: the insufficient quantity and poor quality of PPE provided. These shortcomings are more than logistical oversights—they represent a systemic neglect of preventive health measures and contribute to the growing, yet largely invisible, risk of occupational disease among workers.

Government Regulation No. 50 of 2012 explicitly defines Occupational Health and Safety as encompassing protection against occupational diseases. Referring to the existing regulations,[13] there are four general categories of OD: (1) those caused by exposure to hazardous agents during work activities, (2) those classified by the affected organ system, (3) occupational cancers, and (4) other specific diseases linked to work-related exposure.

Diagnosis requires medical confirmation by a certified occupational health specialist. Within the IMIP complex, various work environments expose workers to conditions that align with these categories. Common examples include excessive heat and noise in production areas, frequent dust exposure during raw material handling, and the continued use of hazardous substances such as asbestos—each of which presents serious risks for developing occupational diseases.

Workers in production areas are often restricted in their daily use of PPE, as a result of which exposure to physical factors is increasingly dangerous for them. For example, in the furnace section, there are already heat-resistant clothing

[13] Regulation President Republic of Indonesia No. 7 of 2019 concerning Occupational Diseases

facilities made of aluminum, but the number is very limited. Not all workers can use the PPE, and it is usually only used by the leading person as shown in Figure 5.1. In fact, if we look at how the working conditions in this furnace section always face the danger of fire with a temperature of 1,500˚ C, then this insufficient quantity of PPE will certainly endanger the workers. As a result, workers must take turns using the PPE, increasing the risk of work accidents and reducing protection against OD.

Figure 5.1: Illustration of Workers in the Furnace Area
Source : PT IMIP website

Concerns surrounding PPE extend beyond availability to the degradation of its quality. Interviews revealed repeated instances where workers reported damaged or ineffective protective gear, only to be told that replacements were delayed due to pending shipments from China. Such delays compel workers to continue using worn-out equipment, placing them at risk of both immediate injury and long-term health deterioration.

Similar issues exist in peripheral yet demanding environments. Canteen workers, responsible for preparing meals under intense heat, are equipped with makeshift protective clothing, such as layered T-shirts, and must resort to dipping their hands in water to reduce heat stress while handling industrial ovens that reach 108°C. These practices highlight a broader institutional failure to recognize and mitigate diverse occupational hazards beyond core production zones.

Work areas that have potential chemical exposure due to dust or exposure to other raw materials also have the same issue. For instance, workers in the Rotary Kiln area, who are constantly exposed to fine particulate dust during nickel ore processing, are typically provided with N95 or basic 3-ply masks, often doubled up. Reports of these masks being reused for multiple days or washed for prolonged use further underscore the ineffectiveness of current PPE practices.

In 2024, some workers reported a decrease in the frequency of PPE distribution, resulting in them having to use the same mask for up to three consecutive days, a practice that significantly reduces its protective capacity. Asbestos exposure also remains a source of concern through its use as a cooling agent in nickel ore processing.[14] Although Indonesia has categorized asbestos as a B3 (Hazardous and Toxic Material) material in category A1 or a proven human carcinogen,[15] not all uses of asbestos materials are banned.

[14] For a more complete explanation, see report Sembada Bersama is entitled " Workers Waiting to Die in Morowali : The Risks of Occupational Diseases in One of the World's Largest Nickel Industrial Zone." (2024)
[15] Regulation Government Republic of Indonesia Number 74 of 2001 Concerning Management of Hazardous and Toxic Materials.

The ban is only given to blue asbestos (crosidolite), while white asbestos (chrysotile) is still allowed with strict safety requirements (Sudrajat, 2021). Despite these hazards, there are notable gaps in mechanisms for early detection of occupational diseases.

While annual medical check-ups (MCUs) are mandated, implementation is inconsistent. Many workers reported not receiving their MCU results or receiving only vague, non-specific summaries. Critically, the tests conducted often fail to reflect the specific health risks posed by each worker's environment. Critically, the tests conducted often fail to reflect the specific health risks posed by each worker's environment.

For example, workers exposed to high noise levels should have their hearing checked, while those exposed to nickel dust should have their lung capacity assessed to detect the risk of diseases such as pneumoconiosis or black lung. As a result, many workers are unaware of their actual health conditions and potential chronic conditions such as hearing impairment or chronic obstructive pulmonary disease (COPD) may remain undiagnosed.

The cumulative impact of inadequate PPE, chronic exposure to occupational hazards, and ineffective medical surveillance contributes to the long-term deterioration of workers' health. Regulations related to the provision of OD services also outline a seven-step process that requires clinical confirmation and environmental verification by certified professionals.[16] However, in practice, initiating this process can be challenging without employer cooperation, particularly in obtaining environmental exposure data.

This reliance on employer transparency creates significant barriers for workers attempting to report or verify occupational illnesses. In the end, workers do not have an independent pathway for complaint and diagnosis on the indications of OD, leaving the risk of occupational diseases to continue growing largely undetected and unaddressed.

[16] Minister of Health Regulation No. 56 of 2016 concerning Implementation Service of Occupational Diseases

Figura 5.2: The search process for victims of the IMIP nickel tailings landslide in April 2025
Source : Confidential

Source : PT IMIP website

Specific Challenges for Female Workers in the IMIP Area

> “Policies that are more favorable to female workers are needed, including the enforcement of anti-harassment policies, the improvement of supporting facilities, and the strengthening of the role of female workers in labor unions and collective bargaining agreements. Without concrete efforts to address these inequalities, female workers at IMIP will continue to experience double exploitation—both as workers and as women in a gender-biased work environment.”

While the labor challenges in the IMIP area broadly affect all workers, gender-specific vulnerabilities faced by female workers remain underrecognized. Although female workers in the IMIP area reportedly receive rights as stipulated under Indonesian labor law—such as two days of menstrual leave with a doctor's note from the IMIP Clinic, and up to five months of maternity leave, which exceeds the three months mandated by national regulations—these formal provisions do not fully capture the complexity of their lived experiences.

The IMIP area also claims a commitment to equality, ensuring equal pay between male and female workers and undertaking preventive actions against sexual harassment through counseling and awareness campaigns (PT. Indonesia Morowali Industrial Park, 2024a). However, the structural and environmental barriers that female workers face suggest that these protections are insufficient in practice.

Figure : 6.1 Female workers at IMIP
Source : Confidential

Despite these formal rights, according to interviews that were conducted with the female workers, numerous challenges persist. Female workers are subject to the same mandatory overtime system as their male counterparts, often resulting in 12-hour workdays. On average, women report working 52 hours per week or 210 hours per month. Due to limited access to overtime opportunities, however, their total monthly wages tend to be around 10% lower than the average wage across the IMIP area. Women hold various roles, including positions in office administration, control rooms, translation, heavy machinery operation, and delivery driving.

Yet, the dual burden of formal employment and domestic responsibilities significantly exacerbates their fatigue. One female worker explained that she deliberately opted for night shifts to maximize time spent with her infant son during the day—an example of how the structural demands of the workplace intersect with personal and familial obligations in a way that disproportionately affects women.

The industrial nature of IMIP, where 92% of the workforce is male, creates a work environment where female employees are especially vulnerable to harassment and unsafe conditions. Of particular concern is the risk of sexual harassment during night shifts or after-hours overtime work. Although the company has implemented a designated female-only space on shuttle buses and prioritizes boarding for women, the centralized pick-up point at IMIP's airport remains problematic.

Many workers reside outside the immediate area, and commuting during nighttime hours heightens exposure to criminal threats. Regulation through the Minister of Manpower and Transmigration Decree No. 224/Men/2023 requires employers to provide transportation for women working between 23:00 and 05:00,[17] with employers determined pick-up points—in which must be accessible and secure.[18] However, current implementation appears inadequate given the high crime rate in Morowali. A more robust and inclusive

[17] Minister of Manpower and Transmigration Decree Number 224/Men/2023 concerning the Obligations of Employers Who Need Female Workers, Article 2, paragraph 3, and Article 6, paragraph 2.
[18]Minister of Manpower and Transmigration Decree Number 224/Men/2023 concerning the Obligations of Employers Who Need Female Workers, Article 7, paragraph 1.

pick-up and drop-off system—including door-to-door options—should be considered, aligning with best practices in high-risk industries.

Toilet and sanitation facilities pose additional safety and health concerns. While separate toilets for men and women have been provided, security remains an issue. One incident reported involved a female worker being spied upon during her shift, with the perpetrator climbing the back wall of a partially exposed restroom. Furthermore, the water supply—originating from treated industrial wastewater—has raised concerns about its potential impact on reproductive health.

Limited availability, poor lighting, long distances from workspaces, and routes passing through hazardous production zones all contribute to unsafe conditions for female workers. Most facilities are equipped only with squat toilets, which are unsuitable for pregnant workers and compromise both comfort and safety.

The situation is particularly precarious for pregnant women, who often continue to face heavy workloads despite regulatory protections that require adjustments based on physical condition. In practice, such accommodations are frequently overlooked. Compounding the issue is the lack of suitable nutritional options in the company-provided meals, which are often high in oil content and potentially detrimental to maternal health. Moreover, the absence of maternity-appropriate PPE forces pregnant workers to rely on loose clothing like nightgowns, offering little to no protection in hazardous work environments.

The combined effects of excessive working hours, safety concerns, and insufficient sanitation highlight the urgent need for gender-responsive policy reform. Efforts should include rigorous enforcement of anti-harassment protocols, improvement of transport and sanitation infrastructure, and provision of specialized equipment and accommodations for pregnant

workers. Furthermore, empowering women through greater representation in trade unions and CBA negotiations is critical. Without comprehensive, targeted interventions, female workers in IMIP will remain subject to layered forms of exploitation—as both industrial laborers and women operating within a gender-biased occupational structure.

Source : Confidential

Exploited at Work, Yet Life Remains Difficult

> “ Essentially, the company’s power over workers will always be greater without collective consciousness. As long as labor unions cannot sit on equal footing with management, exploitation will continue. The only way to get employers to sit down and negotiate is by strengthening workers’ bargaining power against employers through the strengthening of labor unions that target unorganized workers. ”

The challenges and harsh working conditions faced by workers in the IMIP area are far from new. Nevertheless, working in the IMIP complex is often romanticized as a form of "struggle" in pursuit of a better future. In truth, there are numerous alternative pathways to achieving a decent life that do not involve risking one's safety and well-being. This study identifies several structural factors that contribute to workers' apparent powerlessness in the face of exploitative labor conditions. These include economic pressure and unequal power relations, the low density and fragmentation of trade unions within the IMIP area, and horizontal tensions that undermine the development of effective social dialogue.

Between Economic Pressure and Power Relations

Despite the extreme and demanding nature of the working conditions in the IMIP area, employment in the park remains a highly sought-after opportunity. The persistent allure of employment in IMIP appears to overshadow the long-term health risks and safety concerns that workers face on a daily basis. Although the detrimental effects of prolonged working hours may not be immediately visible, such conditions lead to cumulative fatigue over time.

The National Safety Council (2017) identifies nine primary contributors to workplace fatigue: shift work, working during vulnerable hours, physically demanding tasks, extended daily shifts, long weekly work hours, insufficient sleep, inadequate rest during shifts, short breaks, and long commutes. Nearly all of these conditions are present in IMIP, making fatigue a systemic issue and directly contributing to the area's high rate of workplace accidents.

Furthermore, research conducted by the World Health Organization (WHO) and the International Labour Organization (ILO) underscores the long-term health risks associated with excessive working hours. According to the WHO (2021), individuals who work an average of 55 hours per week face a 35%

Figure 7.1: Illustration of a worker's boarding house room in Morowali
Source : Confidential

increased risk of stroke and a 17% higher risk of heart disease compared to those working standard 35–40 hour weeks. Workers in the IMIP area, averaging 56 hours per week and 225 hours per month, are therefore highly susceptible to severe health problems.

In addition to grueling hours, workers must often perform their duties in unsafe environments. The lack of a robust occupational health and safety (OHS) system, combined with the insufficient and often poor-quality provision of personal protective equipment (PPE), places workers at constant risk. There are also concerning indications of occupational diseases (ODs) due to the compromised safety standards in daily operations.

The hazardous labor is compensated with an average monthly net wage (take-home pay) of IDR 7,573,311, of which IDR 2,824,651 (38%) comes from overtime. The reliance on overtime pay is substantial, suggesting that regular working hours alone do not provide sufficient income to sustain a decent

standard of living, especially for workers supporting families. The breakdown of wages by company is shown in **Table 7.1** below:

Table 7.1: Average Monthly Wage in IMIP Area

Companies	Average Monthly Pay	Average Overtime Pay	Average Take Home Pay
PT. Indonesia Morowali Industrial Park	Rp 4,342,188	Rp 2,625,000	Rp 6,967,188
PT. Indonesia Ruipu Nickel and Chrome Alloy	Rp 3,745,105	Rp 2,563,538	Rp 6,308,644
PT. Indonesia Tsingshan Stainless Steel	Rp 5,011,111	Rp 1,855,556	Rp 6,866,667
PT. Lestari Smelter Indonesia	Rp 3,642,424	Rp 2,454,545	Rp 6,096,970
PT. Qing Feng Ferro Chrome	Rp 5,336,364	Rp 2,270,273	Rp 7,606,636
PT. Dexin Steel Indonesia	Rp 4,674,900	Rp 3,335,042	Rp 8,009,942
PT. QMB New Energy Materials	Rp 5,147,692	Rp 1,913,462	Rp 7,061,154
PT. Risun Wei Shan Indonesia	Rp 4,410,421	Rp 3,710,714	Rp 8,121,135
PT. Walsin Nickel Industrial Indonesia	Rp 5,437,632	Rp 3,422,520	Rp 8,860,151
PT. Indonesia Guang Ching Nickel and Stainless-Steel Industry	Rp 5,389,680	Rp 2,937,674	Rp 8,327,354
Grand Total	**Rp 4,638,270**	**Rp 2,824,651**	**Rp 7,462,921**
Percentage to Average Take Home Pay	**62%**	**38%**	**100%**

When compared to the 2024 minimum wage in Morowali, which stands at IDR 3,489,319, a single worker's income may appear sufficient. However, when viewed alongside average household expenditures from BPS Morowali, financial pressures become clear—especially for workers with dependents. The data in **Table 7.2** illustrates that for a family of three or four, a single worker's income—even with overtime—is barely adequate.

This situation aligns with the results of a survey of workers' survival strategies conducted by the Decent Living Committee in Morowali Regency in 2024 (Komite Hidup Layak, 2024). The high average expenditure of workers around the IMIP area forces them to rely on two short-term solutions to meet their daily needs: borrowing or increasing their working hours (overtime). As a result, a significant portion of their monthly wages must be used to pay off their debts, which fall due each month.[19]

[19] For a more complete explanation , see report The Decent Living Committee entitled " The Economics of Working Class Household Debt ".

Facing this situation, while long working hours are a common complaint among workers in the IMIP area, they also desperately need compensation in the form of overtime due to the economic pressures they face.

Due to this economic pressure, workers often have no choice but to accept excessive overtime. This dependency has also become a tool for managerial control. In many cases, overtime is used informally as a reward-and-punishment mechanism. Since supervisors have discretionary power to decide who receives overtime assignments, workers who refuse additional hours or are seen as "difficult" may be excluded from future overtime opportunities—impacting their overall income.

Table 7.2: Estimated Cost of Living in Morowali by Family Size

	Commodity Group	Total Average Expenditure (per capita)	Expenditure for 2 People (+ Husband/Wife)	Expenditure for 3 People (+ Husband/Wife + 1 Child)	Expenditure for 4 People (+ Husband/Wife + 2 Children)
Food Category	Grains	Rp 125,710	Rp 125,710	Rp 125,710	Rp 125,710
	Tubers	Rp 8,340	Rp 8,340	Rp 8,340	Rp 8,340
	Fish/Shrimp/Squid/Shellfish	Rp 137,492	Rp 137,492	Rp 137,492	Rp 137,492
	Meat	Rp 17,594	Rp 17,594	Rp 17,594	Rp 17,594
	Eggs and Milk	Rp 45,175	Rp 45,175	Rp 45,175	Rp 45,175
	Vegetables	Rp 72,372	Rp 72,372	Rp 72,372	Rp 72,372
	Nuts	Rp 11,291	Rp 11,291	Rp 11,291	Rp 11,291
	Fruits	Rp 65,243	Rp 65,243	Rp 65,243	Rp 65,243
	Oil and Coconut	Rp 24,886	Rp 24,886	Rp 24,886	Rp 24,886
	Drink Ingredients	Rp 27,459	Rp 27,459	Rp 27,459	Rp 27,459
	Spices	Rp 24,480	Rp 24,480	Rp 24,480	Rp 24,480
	Other Food Ingredients	Rp 20,876	Rp 20,876	Rp 20,876	Rp 20,876
	Prepared Foods and Beverages	Rp 219,220	Rp 219,220	Rp 219,220	Rp 219,220
	Cigarettes and Tobacco	Rp 179,588	Rp -	Rp -	Rp -
	Total of Foods	**Rp 979,726**	**Rp 800,138**	**Rp 800,138**	**Rp 800,138**

	Commodity Group	Total Average Expenditure (per capita)	Expenditure for 2 People (+ Husband/Wife)	Expenditure for 3 People (+ Husband/Wife + 1 Child)	Expenditure for 4 People (+ Husband/Wife + 2 Children)
Non-Food Category	Housing and Household Facilities	Rp 715,247	Rp -	Rp -	Rp 715,247
	Miscellaneous Goods and Services	Rp 136,071	Rp 136,071	Rp 136,071	Rp 136,071
	Food, Footwear, and Headwear	Rp 52,473	Rp 52,473	Rp 52,473	Rp 52,473
	Durable Goods	Rp 55,495	Rp 55,495	Rp 55,495	Rp 55,495
	Taxes, Levies, and Insurance	Rp 52,344	Rp 52,344	Rp 52,344	Rp 52,344
	Party and Ceremonial Needs	Rp 17,371	Rp 17,371	Rp 17,371	Rp 17,371
	Total of Non-Foods	**Rp 1,029,001**	**Rp 313,754**	**Rp 313,754**	**Rp 1,029,001**
	Average Expenditure in Morowali	**Rp 2,008,727**	**Rp 3,122,616**	**Rp 4,236,511**	**Rp 6,065,650**

Source : Central Statistics Agency (BPS)

The imbalance of power between employers and workers is further institutionalized through the IMIP Area's Collective Bargaining Agreement (CBA), which contains a clause allowing management to unilaterally reassign workers (mutation transfer) between tenant companies within the industrial complex according to company needs.[20]

This mechanism is certainly not common, especially by the management of the IMIP Area, which seems to facilitate the transfer of workers between tenant companies and obscure workers' employment contracts (Widi, 2024).[21] This practice often occurs without the workers' consent or formal documentation and has been cited as a tactic to sideline workers engaged in union activities. Such practices erode job security and complicate the enforcement of labor rights, particularly during contract termination or disputes regarding severance pay.

Wage structures in the IMIP area are formally outlined in the CBA, which categorizes pay into three main components: basic wages, fixed benefits (e.g., location, housing and family allowances), and non-fixed benefits (e.g., night shift, attendance, and tenure allowances).

These are theoretically designed to comply with district minimum wage (UMK) stipulations—comprising 75% basic wages and 25% fixed benefits (Bharata, 2024).[22] However, interviews revealed that most workers remain unaware of the wage structure or pay scales at their respective companies. The only clearly understood incentive is the "Mandarin allowance" for those proficient in the language. This opacity discourages workers from skill development or pursuing promotion, reinforcing the reliance on overtime for income growth.

[20] IMIP Regional PKB 2023 – 2025, Chapter V. Employment Relations. Article 16 Employee Transfer, Paragraph 1.
[21] For a more complete explanation regarding the recruitment mechanisms and the ambiguity of work contracts in the IMIP area, please read the Rasamala Hijau report entitled "The Chaotic Labor Disputes in Indonesia Morowali Industrial Park (IMIP)."
[22] IMIP Area CBA 2023 – 2025 Chapter X. Compensation and Benefits, Article 49, Paragraph 2.

Figure 7.2: Illustration of workers in the IMIP area
Source : Confidential

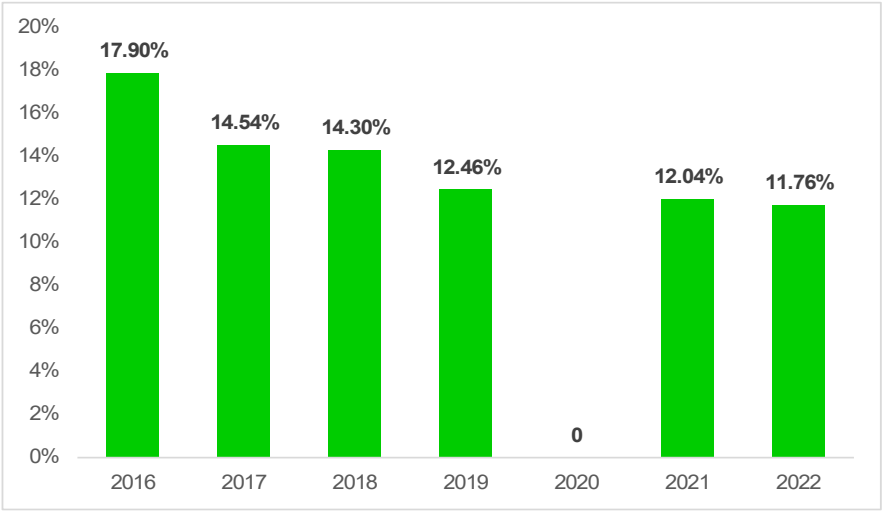
Low Union Density and Union Fragmentation in the IMIP Area

Discussions with workers in the IMIP area revealed a concerning reality: many were unaware of their most fundamental labor rights, even though a significant number are formal members of trade unions operating within the area. This knowledge gap highlights the limitations of union presence in its current form. The low union density—standing at only 11%—indicates that significant work remains to raise awareness and foster greater interest in union membership among workers.

This lack of participation cannot be simply attributed to ignorance. Rather, it is shaped by a set of systemic constraints. Non-unionized workers often cited extreme working hours as a barrier to engaging in any form of organized activity outside work. Others expressed fears over potential negative repercussions on their employment status should they choose to join a union. Additionally, the existence of 11 different unions operating simultaneously

within the IMIP area has led to internal communication challenges. Even within the ASPIRASI coalition, which includes 9 unions, coordination and unity in advocacy efforts are not always achieved.

Graphs 7.1: Percentage of Trade Union Density in Indonesia 2016 - 2022



Source : Central Statistics Agency (BPS)

The situation in IMIP mirrors national trends. Union density among formal workers in Indonesia reached only 11.76% in 2022, continuing a consistent downward trend observed over the past five years **(Graph 7.1)**. This decline has occurred even as the total number of unions and unionized workers has increased steadily in the past nine years **(Table 7.3)**.

This contradiction suggests that union organizing efforts have largely focused on already-unionized workplaces or workers with prior exposure to unionism, rather than reaching out to those in most need of representation (Asgani, 2024).

Table 7.3: Number of Trade Unions in Indonesia 2015 - 2023

Unions in Indonesia	Total								
	2015	2016	2017	2018	2019	2020	2021	2022	2023
Confederation	8	11	14	14	16	16	16	18	21
Federation	101	111	115	134	147	161	169	195	198
Plant level/Local Union	7,294	7,294	7,294	7,294	10,748	10,748	10,748	12,346	12,346
Total Members	2,717,961	2,717,961	2,717,961	2,717,961	3,256,025	3,256,025	3,256,025	4,208,338	4,208,338
Union Density*	-	17.9%	14.54%	14.3%	12.46%	-	12.04%	11,76%	-

Source : SatuData Ministry of Manpower
*Union Density Rate is based on estimation from ILOSTAT and the BPS (Central Statistical Bureau of Indonesia).

Simultaneously, the development of strategic alliances among unions is crucial to amplify collective bargaining power. Shared experiences and common interests—such as unsafe working conditions and precarious employment terms—can foster a stronger collective identity among workers in the IMIP area. This shared identity forms a foundation for unified advocacy efforts to address systemic labor issues.

The upcoming renegotiation of the IMIP Area Collective Bargaining Agreement at the end of 2025 offers a significant opportunity to advance this cause. In the short term, unions must collaborate closely to advocate for meaningful improvements in the CBA. Over the medium and long term, such alliances could evolve into stronger inter-union networks rooted in solidarity, where workers from different companies see themselves as part of a broader, unified struggle. In this context, the principle that “an injury to one is an injury to all” becomes not just a slogan, but a strategic framework for action.

Horizontal Tension and Weak Social Dialogue

Tensions between foreign and local workers in the IMIP area have contributed to a strained and often fragmented workplace atmosphere. These tensions are

largely rooted in three key issues: language barriers, hierarchical job structures, and deliberate segregation perpetuated by both the government and regional management. Beyond the workplace, anti-foreign worker sentiment—particularly directed toward Chinese nationals—is also prevalent in public discourse.

This narrative suggests that the influx of foreign workers threatens local employment, and it resonates in interviews with IMIP workers, where frustration was expressed toward Chinese supervisors for assigning tasks that often violate occupational safety procedures. Phrases such as "just use it first," frequently used by these supervisors, have become symbols of disregard for proper safety protocols and a source of local workers' discontent.

These antagonisms escalated dramatically in the incident at PT Gunbuster Nickel Indonesia (GNI), North Morowali, on January 14, 2023, which resulted in two fatalities—one local worker and one foreign worker(Anggela, 2023). The confrontation was the culmination of growing unrest among local workers following a deadly workplace accident. On December 22, 2022, a fire broke out in Furnace Number 17 at the smelter facility, killing two workers, Nirwana Selle and I Made Defri Hari Jonathan, who were found inside a crane due to delayed evacuation procedures (Mappiwali, 2022; Sari, 2023b).

The incident sparked outrage among employees who are members of the National Workers Union (Serikat Pekerja Nasional/SPN) at PT GNI and initiated plans for a strike action from January 10 to January 14, 2023, demanding systemic improvements to workplace safety and conditions (Sari, 2023a). Tensions reached a boiling point on the final day of the strike when a misunderstanding between local and foreign workers escalated into a physical altercation.

As the situation spiraled out of control, management allegedly fueled an "us versus them" narrative, further deepening the divide. This response not

only increased fear and suspicion but also reinforced ethnic and national divisions among the workforces. Foreign workers were instructed by company management to protect corporate property using iron pipes and to barricade buildings against what was portrayed as a violent uprising. At the time, many foreign workers misinterpreted the local workers' actions as personal hostility, unaware that legitimate safety concerns drove the protest. However, after the situation calmed, both sides recognized their shared grievances, including working continuously for seven days without rest, confiscation of passports, restrictions on movement outside of the worksite, and frequent wage deductions without explanation (Adinda, 2023).

These revelations made it clear that the antagonism between local and foreign workers had obscured a fundamental reality, in which both groups are subjected to similar exploitative practices under the same labor regime.

Reflecting on the conflict at PT. GNI, we see a fundamental breakdown in communication between local and foreign workers, a situation that could also occur in the IMIP area. At the core of this conflict is a severe communication breakdown. The previously mentioned contributing factors—language gaps,

Figure 7.3: Training Union Members/Workers
Source : Member of FPE

[23] For a more complete explanation of the conflict at PT. GNI, please visit the Project Multatuli website, entitled "Between Nickel and A Hard Place: Plight of Indonesian and Chinese Workers Behind Electric Vehicle Boom."

imposed segregation, and workplace hierarchy—are all deeply rooted in communication failures. Many workers expressed discomfort in addressing concerns directly to the management team, especially the expatriate managers, who often do not speak Bahasa Indonesia. Since the removal of the language requirement for foreign hires, misunderstandings have increased, and much of the communication now depends on translators or designated spokespersons. This further dilutes the authenticity and urgency of the messages conveyed by local workers, reinforcing a sense of alienation.

These language and relational barriers are compounded by the absence of institutional mechanisms for regular dialogue. Bipartite meetings—intended as formal channels for communication between management and workers—are rarely conducted. According to workers interviewed, no routine bipartite discussions are held, and grievances are only acknowledged after extreme incidents, such as fatal accidents.

In terms of tripartite relations involving the government, workers face additional challenges. A report by Inkrispena (Gedepuraka, 2024) outlines two primary issues: (1) limitations in local government authority to intervene in disputes occurring within PSN-designated areas like IMIP, and (2) the lack of capacity among local officials to effectively handle industrial relations. The PSN (Strategic National Project) status of IMIP further shields the area from public scrutiny and labor oversight. This status grants privileges that reduce transparency and hinder government enforcement of labor standards, despite frequent workplace accidents (Lahadalia, 2024; Al-Ayubby, 2025).

Despite the generally poor state of social dialogue in the IMIP area, there are emerging signs of progress. A small number of companies have begun to permit union activities, allow organizing within the worksite, and even provide dedicated spaces for union meetings. However, these instances are exceptional and depend heavily on the disposition of individual management teams.

In a context where employers hold disproportionate power, the only viable path toward meaningful social dialogue lies in strengthening trade union organizations. Empowered unions with greater bargaining power are essential to compelling employers to engage in good-faith negotiations and address systemic workplace issues.

The three factors outlined in this section illustrate that although the exploitation occurring in the IMIP area is felt by all workers, escaping its clutches is not easy. Economically, IMIP workers remain heavily dependent on the overtime pay they receive daily due to the extremely high cost of living in Morowali. Unofficial overtime serves as both a reward and a punishment mechanism for supervisors to ensure that workers comply with the established system.

Beyond economic issues, the ineffectiveness of labor organizing also contributes to pressure on the company. This is compounded by management's reluctance to engage in social dialogue and the local government's limited ability to intervene in IMIP due to its status as a National Strategic Project (PSN). Without changes in any of these factors—whether economic, union organizing, openness to social dialogue, or a greater role for the local government—workers in the IMIP area will continue to be exploited. Essentially, the company's power over workers will always be greater without collective awareness.

Until labor unions can achieve equality with management, exploitation will continue. The only way to get employers to sit down and negotiate is to strengthen workers' bargaining power by strengthening union organizations that target non-unionized workers. Ultimately, change must begin within us.

What Needs To Be Done?

The recurring work accidents in the IMIP area reveal significant gaps in the Collective Bargaining Agreements, particularly in how they're interpreted and implemented. Many of these gray areas—such as the mandatory overtime system—are not regulated clearly in CBAs or national labor laws but are instead introduced through individual agreements at the time of hiring. This leaves workers with no real choice, even when their safety is at stake. Such practices neutralize the possibility of collective resistance, exploiting the workers' lack of awareness about the risks they'll face on the job.

Moreover, the inconsistent adoption of the IMIP Collective Labor Agreement across companies undermines its effectiveness as a safeguard for workers. While some tenant companies follow the agreement, many either ignore it or do not have a CBA at all—leaving thousands of workers without standardized protections. To address this, the IMIP CBA must be elevated and enforced as the "Golden Rules": a mandatory baseline that no company can fall below.

These rules should define the non-negotiable rights and minimum safety standards that apply to all workers across the industrial park, regardless of employer. This approach would end the current patchwork of protections, prevent employers from sidestepping worker rights, and centralize the union's advocacy efforts into one unified negotiation platform. Rather than fighting the same battles in every company, workers and unions can focus on strengthening a single, enforceable standard that lifts conditions across the board.

To make this a reality, we propose six key actions:

First, unions in IMIP must prioritize building solidarity and strategic collaboration. With union density still low and labor movements fragmented,

workers' demands lack sufficient leverage. Stronger organizing efforts and unified bargaining will be crucial to address major issues such as long working hours, occupational health and safety (OHS), and protection against arbitrary dismissals.

Second, the principle of "No Safety, No Work" must be adopted across all sectors. Workers should have the explicit right to refuse unsafe work without fear of reprisal. This is a fundamental right that can no longer be ignored, especially in light of the many preventable deaths already witnessed.

Third, a clear and enforceable opt-out mechanism must be introduced for overtime. The current system traps workers in exploitative schedules with no viable alternative. Overtime should be voluntary and subject to regular audits to prevent abuse from supervisors or management.

Fourth, monthly bipartite meetings between worker representatives and management must become standard practice. Workers currently lack structured channels to raise complaints or advocate for better conditions. Routine dialogue would not only humanize labor relations but also increase accountability and transparency in company decisions.

Fifth, reforming the IMIP CBA by 2025 must be treated as a priority. The revised agreement should include stronger provisions on humane working hours, due process in employment termination, and the enforcement of robust safety protocols. This reform must ensure the CBA is no longer just a formality but a powerful enforcement tool.

Sixth, all tenant companies in the IMIP area should be encouraged or required to adopt their own company-level CBAs, which refer to the IMIP CBA as a baseline. These tailored agreements would provide more specific protections while upholding broader standards across the region.

Without these concrete steps, the high rate of workplace accidents in IMIP will continue to be treated as business as usual. Employers will not change unless pushed, and government oversight remains limited due to the National Strategic Project (PSN) status of the complex. Real improvements must be driven by empowered workers and unified trade unions.

In the end, worker safety and dignity must never be sacrificed for productivity. The nickel industry's success cannot be built on the back of unsafe, exploitative labor. Unless workers are given the tools, rights, and organizational power to fight for their wellbeing, their lives will remain disposable in the name of national development.

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