



Advancing human rights policy and practice in the agribusiness sector:

An implementation toolkit

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The Global Agribusiness Alliance

Global attention is increasingly focusing on food and land-use systems. Agribusinesses represent over USD \$5 trillion¹ in global trade and support the livelihoods of 2.5 billion² people. Agriculture is central to some of the world's unprecedented challenges: addressing climate change and biodiversity loss while providing food and biomaterials for a growing population.

The Global Agribusiness Alliance (GAA), a WBCSD sector project, is a multi-commodity and cross-geography CEO-led platform for supply-side advocacy and action. Its mandate is to strengthen building sustainable landscapes and livelihoods, making an additional contribution to the Sustainable Development Goals (SDGs).

Purpose of this document

This toolkit aims to foster alignment and scale action to improve human rights policy and practice within the GAA membership and agribusiness sector. It represents an important first step to building awareness, understanding and capacity around the human rights agenda.



1 Introduction to human rights

WHAT ARE HUMAN RIGHTS?

- Human rights are fundamental rights and freedoms that every human is entitled to, without discrimination.
- Human rights are enshrined in international declarations and customary law. International declarations and customary law, this includes the United Nations (UN) Universal Declaration of Human Rights and the International Labour Organization's Declaration of Fundamental Principles and Rights at work.
- Human rights include civil and political, economic, social and cultural rights. Not all apply to business, but they go wider than labor rights.

WHAT IS HUMAN RIGHTS RISK?

For many areas of risk, for example the risk of financial failure, loss of business or interruption of operations, risk can represent the potential damage to companies themselves. However, human rights and sustainability risks refer to the likelihood of adverse business impacts on people, the environment and society. For example, the reputational impact of forced labor on a company is secondary to the impact on the people affected. This lens is important as it may affect the steps taken to address the risk. In human rights terms, impacted people are termed 'rights-holders'. This is not to say

that the impact associated with environmental impacts or human rights abuses on a company should be ignored. Reputational damage or operational interruptions are important factors in determining how a company responds. But these factors should not be the primary lens through which human rights risks are viewed.

UNDERSTANDING THE GLOBAL POLICY FRAMEWORK: THE UN GUIDING PRINCIPLES

In 2011, the UN Human Rights Council unanimously endorsed the UN Guiding Principles on Business and Human Rights (UNGPs). ([Watch the short introductory film.](#)) Tenets of the UNGPs include:

- **They apply to all States and to all business enterprises,** both transnational and others, regardless of their size, sector, location, ownership and structure.
- They 'protect, respect and remedy' framework provided the **first global standard for preventing and addressing the impacts of business activities on human rights.**
- The expectation on businesses **does not just apply to their own operations but if their products or services are linked to human rights abuses, they have a responsibility to take reasonable steps to provide effective remedy to victims.**

The UNGPs also provide a risk management approach but their focus is on risk to people, not just risk to the business. The concept of saliency emphasizes this. (see Drivers for action on page 6). Other key elements of the UNGPs include:

- Compliance with the law is necessary but not enough to fulfil this responsibility as legal provisions may be inadequate to cover all the rights required. Many countries have adequate labor or environmental laws but lack the capacity to enforce them. In either situation, companies have a responsibility to consider the impacts of their own activities and those of their business partners in addition to legal compliance.
- Companies cannot offset human rights impacts by doing good in another area or through philanthropy. For example, employee volunteering cannot compensate for human rights harms elsewhere; and
- The UNGPs define business responsibility as showing "commitment, human rights due diligence and remediation." Benchmarks, indices and other assessments of corporate respect for human rights often follow this structure when assessing business performance.

Figure 1: What are human rights?

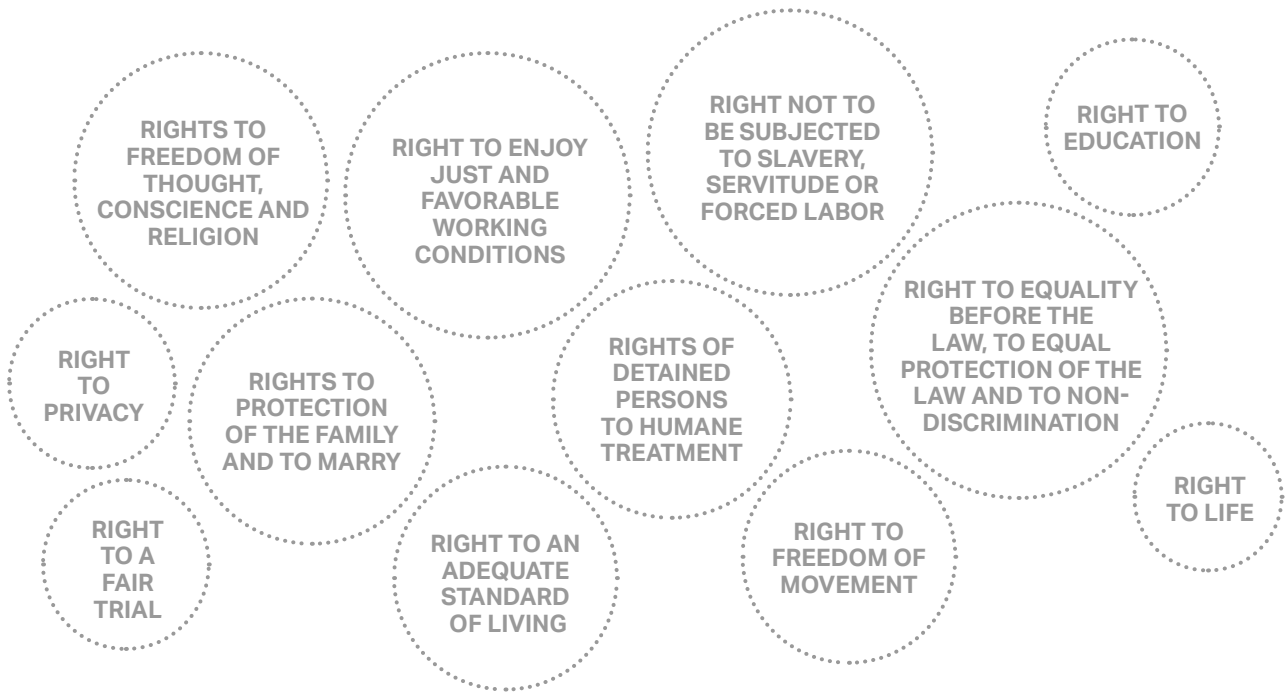


Figure 2: The UN's Protect, Respect, Remedy Framework



DRIVERS FOR ACTION

Since the UN introduced the UNGPs in 2011 as the overarching global standard, the expectations for the private sector in terms of its approach to respecting human rights have started to change in many critical ways:

- **Regulation:** Regulation is moving from soft to hard law, making expectations enforceable; and legislation is shifting from disclosure of steps taken (even if none taken) to requiring implementation of due diligence or holding companies liable for not doing so.
- **Global benchmarking:** Benchmarking using publicly available information is becoming increasingly prevalent and gaining greater recognition by stakeholders, who are using the data to assess company performance to inform investments, private or public procurement, government development of relevant legislation, shareholder resolutions and consumer campaigns.
- **Available guidance:** There is a growing body of human rights guidance to support companies

in operationalizing the UNGPs, such as how to develop a policy, how to carry out human rights due diligence (HRDD) and solutions to engage stakeholders and establish grievance and remedy mechanisms.

- **Public pressure:** Public interest in and expectations for companies and their CEOs are high and increasing. The media regularly reports on human rights abuses. Consumers are looking for responsible products and are prepared to act on companies that do not demonstrate their commitment and action. Activist campaigns are increasing.
- **Transparency:** Technology is increasing the speed of communication and providing greater transparency into business activities. The complex network of global producers that agribusinesses use to produce their goods is much less opaque than only a few years ago. Knowing factory and farm details enables workers, labor organizations, human rights groups and others to swiftly

alert agribusinesses company representatives to labor abuses in those factories and farms, giving companies an opportunity to intervene sooner rather than later to stop and rectify abuses. It also facilitates collaboration and collective action to stop, prevent, mitigate and provide a remedy for labor abuses.

Useful further reading includes the [WBCSD CEO Guide to Human Rights](#). This is a high-level overview for CEOs on the significance of the human rights agenda for business, with the intent to align forward-thinking leaders around a strong business case. It provides insight into how companies are meeting the corporate responsibility to respect human rights, shares actions CEOs are taking to demonstrate leadership and launches an urgent call for action to CEOs signed by 50+ senior executives of WBCSD member companies.

An interactive map of the business and human rights landscape, available via WBCSD's Business and Human Rights Gateway can be found [here](#).

2 Human rights risks in the agribusiness sector

Agribusinesses have significant land footprints and are major employers worldwide, including in countries with fragile social and political environments and weak jurisdictions. Their value chains are complex and multi-tiered including different agricultural inputs, different sized farming operations and different types of operations such as food processing, transport and logistics.

Value chains also have different degrees of integration and number of tiers (distance between the processor and the farm) which impact on agribusinesses ability to investigate risk and remediate.

This complexity means there are a broad range of human rights and sustainability issues that agribusinesses could impact.

International legal instruments such as the Universal Declaration on Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic and Social Rights, and the International Labour Organization's Fundamental Conventions categorize these. Table 1 lists those human rights risks likely to be most serious for the agribusiness sector.

Table 1: The most serious risks for the agribusiness sector

Risk categories	Key rights-holders	Examples of human rights risks related to agribusiness
Fundamental labor rights	Workers	<ul style="list-style-type: none"> • Forced labor • Child labor • Lack of respect for freedom of association • Discrimination in employment
Working conditions	Workers	<ul style="list-style-type: none"> • Wages below legal minimum wage • Wages below living wage levels • Excessive hours • Health and safety breaches • Abusive treatment • Lack of access to grievance mechanisms • Abuse of temporary contracts • Unethical recruitment
Social, environmental and economic rights	Workers, communities	<ul style="list-style-type: none"> • Noise or air pollution affecting local communities • Emissions impacting local water supplies • Road transport creating traffic dangers • Land acquisition without due process
Civil and political rights	Workers, communities	<ul style="list-style-type: none"> • Workers prevented by their employer from political participation • Excessive use of force by security forces to repress community complaints • Company staff undertaking bribery of government officials

For more details on each human rights issue and useful implementation tools, see the [Business and Human Rights Resource Centre Compendium](#).

PRIORITIZING RISK

It is possible to order or rank risks according to the severity of the impact and the likelihood of occurrence. Not all impacts are equal. Some may be more serious in terms of their consequences or may affect more people or a wider area. For example, loss of life is more serious than a temporary injury. Therefore, a high risk is something that has high impact or high likelihood, whereas

a lower risk may have a less significant impact or have lower probability of happening. One objective of a risk assessment is to narrow down the possible risks to those that are the most likely and the most serious. In the UNGPs, these priority risks are the most “salient”.

Salient human rights issues are the human rights at risk of the most severe negative impacts through a company’s operations and value chain.

Assessing saliency is a means of prioritizing efforts based on 1) severity of a negative impact and 2) the likelihood of a negative impact happening.

Table 2 lists the three components that compose severity: scale, scope and remediability.

Table 2: The three components of severity³

Dimension	Definition	Examples	
		More severe	Less severe
Scale	How grave or serious the impact would be	<ul style="list-style-type: none"> • A 12-year-old working in a factory • Toxic waste threatens ground water 	<ul style="list-style-type: none"> • A 14-year-old helping on the family farm during harvest • Occasional emissions create nuisance
Scope	How widespread the impact would be (or how many people affected)	<ul style="list-style-type: none"> • A whole community or workforce • A wide area 	<ul style="list-style-type: none"> • An individual or a few people • A localized or contained area
Remediability	How hard it would be to put right or reverse	<ul style="list-style-type: none"> • An incurable industrial disease • Human trafficking creating lifelong trauma 	<ul style="list-style-type: none"> • A physical injury that will get better • Unpaid wages rectified by compensation

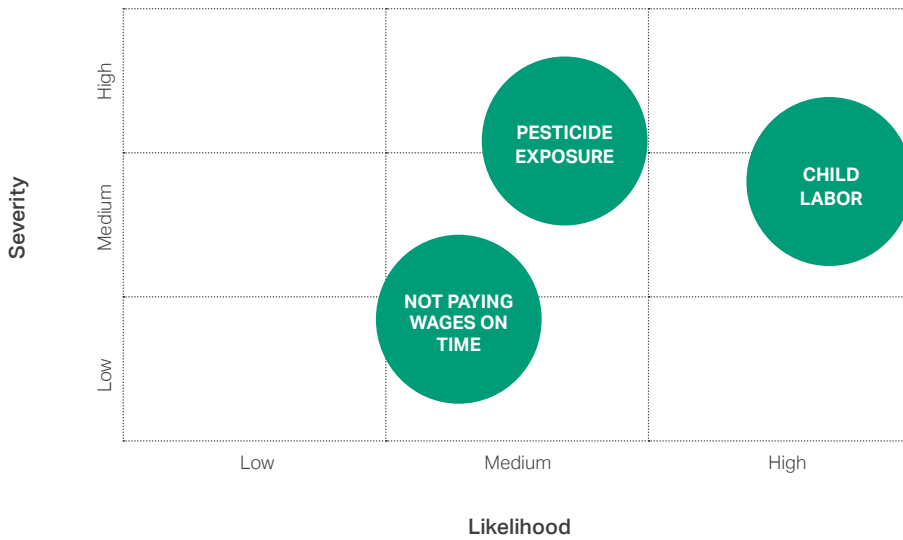
Prioritization will be different from one company to another. An impact can be severe even if it appears on only one of the above dimensions – it does not need to count as severe against all three. The second consideration for saliency is likelihood, in other words, what is the probability that the issue may occur. Deciding on likelihood can involve considering additional

knowledge about the context of the country, industry or agribusiness supply chain model, or is derivable from supply chain compliance data. Such factors may include whether such instances are known to have occurred at that or other suppliers, whether there are credible reports of the issue within the sector, whether the supplier is known to have strong

policies and practices, and whether the country has weak governance.

By applying these saliency factors to identified risks, it should be possible to determine a shortlist of the highest priority risks. There are simple exercises a company can do as part of its human rights due diligence to help prioritize action:

Figure 3: Prioritizing action



See the [UNGP Reporting Framework: Salient Human Rights Issues](#) video for more information.

The overall risk assessment should be kept under review as new information comes to light; for example, a new NGO or media report, feedback from audits of supplier visits, or initiating sourcing from a new country. An updated new risk assessment should be conducted regularly and its frequency dependent on the stability or complexity of the supply chain.

WHO IS AT RISK?

It can be useful to think about risk in terms of the most vulnerable groups who might be negatively impacted most by the business activities. In other words those groups that lack power or agency and therefore are most likely to suffer human rights abuses or exploitation.

Vulnerable workers often include:

- Women
- Children or younger workers
- Migrants and refugees
- Seasonal and temporary workers
- Workers without established or regular contracts

- Groups who are subject to cultural or legal discrimination

Communities more at risk include:

- Isolated communities
- Marginalized or minority communities
- Indigenous communities

Figure 4: Who are the vulnerable people in agribusiness supply chains? Many vulnerable people are involved in global supply chains⁴



Women & girls:

- Women represent 43% of the agricultural workforce in developing countries (20-50% depending on region). **Source: FAO**
- Women own less than 30% of land, generally have smaller plots, of an inferior quality and with less secure rights. **Source: FAO**
- In Africa, Asia and the Pacific, women typically work 12 to 13 hours/week more than men; yet, women’s contributions are often “invisible” and unpaid. **Source: UN Women**
- Women hold less than 30% of senior managerial positions worldwide. **Source: Grant Thornton**
- Women are 14 times more likely than men to die during a disaster. **Source: IBID**
- Costs to the global economy of discriminatory social norms and violence against women is estimated to be approximately USD \$12 trillion annually. **Source: McKinsey**



Children:

- Of the 152 million children in child labor situations around the world, more than 70% work in agriculture. The number of children in child labor in agriculture has increased by 10 million since 2012. **Source: ILO^a**
- Household poverty remains a common cause of child labor in agriculture. **Source: FAO^c**
- 26% of the estimated 24.9 million people in forced labor worldwide work in the food supply chain. **Source: ILO^b**
- Household heads with higher education levels send their children to school rather than let their children work. **Source: ILO^c**
- 50% of agribusiness companies fail to manage child labor risk. **Source: CHRB**
- Access to quality education is one of the most effective tools to reduce the risk of child labor. **Source: UNICEF**



Migrant workers:

- Often migrant workers pay large recruitment fees to agencies and other intermediaries to secure employment abroad. This can result in debt bondage, an indicator of forced labor. **Source: IHRB^a**
- They are less likely to raise grievances with employers or authorities, especially if they are undocumented. **Source: ETI**
- Often subject to wage-related discrimination, paid less and required to work longer than local workers, farmers justify this by in-kind contributions to migrant workers, such as accommodation and transport, which can be unsafe and poor quality. **Source: FLA**
- Migrant workers often find it difficult to access trade union protection when working in the informal economy or they may not possess resident or work visas and be fearful of seeking the protection from formal institutions. **Source: IHRB^b**



Indigenous peoples:

- Large-scale investment in land has wide implications for the livelihoods, welfare and cultural identity of indigenous peoples and local communities, **Source: FAO^c**
- 370 million indigenous peoples worldwide in >90 countries make up 5% of the global population, account for 15% of the extreme poor and protect 80% of the world’s biodiversity. **Source: World Bank**
- Free Prior Informed Consent (FPIC) has emerged as an international human rights standard that derives from the collective rights of indigenous peoples to self-determination and to their lands, territories and other properties **Source: FAO^d**
- FPIC is not always sensitive to gender issues. **Source: WRI**
- Human rights abuses related to land rights and culture have prompted growing migration to towns and cities. Cut off from resources and traditions vital to their welfare and survival, many face even greater marginalization, poverty, disease and violence – and sometimes, extinction as a people. **Source: Amnesty International**

The COVID-19 crisis has exposed the fragility of global supply chains and the importance of ensuring sustainable livelihoods for the farmers and workers within them. Pandemics like COVID-19 can increase the vulnerability of people who have little or no financial buffer due to insecure employment, are older like many farmers, or are already in poor health. Operating in countries without effective public service delivery and support exacerbates this situation. Investing in resilient supply chains now will support food security in the long term and better enable agribusinesses to meet future global shocks such as new pandemics, climate-related risks and extreme weather events or financial crises.

TAKING ACTION

Prioritizing risks is not an end in itself, but a way of selecting the areas where you should take action.

The key questions to consider are:

- How can you best validate the issues that have resulted from the risk assessment – how to be certain that the impact is occurring?
- What are the root causes of the risks you need to address – how to identify the real reasons the impact is occurring?
- What are the most useful actions to mitigate the risks – what is needed to address the root causes and reduce the impacts?

Under the UNGPs, companies have a responsibility to act on risks or if they have caused, contributed to or are linked to human rights abuses. Analyzing the company's level of responsibility for human rights abuses (both direct

and indirect) can be helpful in understanding and differentiating the company's responsibility for remediation. It can also help you to determine and increase your company leverage. - See Figure 5 and 6.

Many human rights issues are bigger than one organization. For example, they may be endemic in society or common practices in the sector; or for the agribusiness to change, all customers will need to agree to do business in a different way.

To make traction on these difficult human rights issues, the business will need to use all three points of leverage – business, partnership and multi-stakeholder – in developing their action plan.

This will be further explored in Step 2: human rights risks and impact assessment (HRIA) and Step 3: Taking action – mitigation and remediation.



Figure 5: Increasing leverage

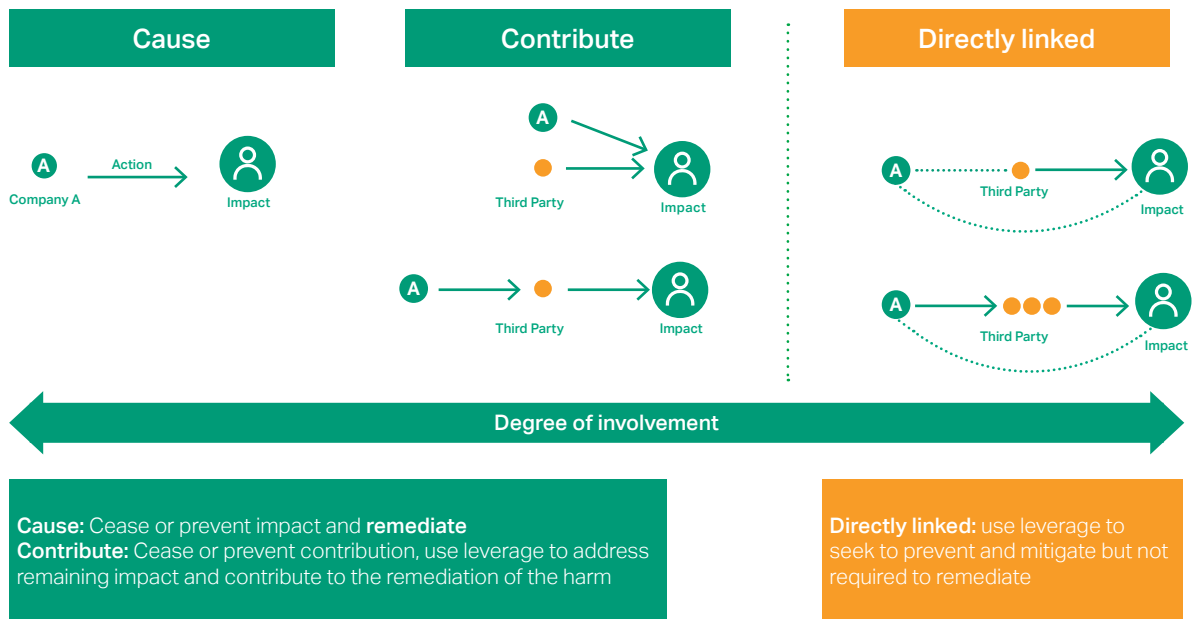


Figure 6: Types of leverage

Business	<p>Commercial: negotiating contracts, audits, tenders, scorecards, incentives (price, volume, long-term business)</p> <p>Broader business: capacity building, innovation fund, income diversification</p>
Partnership	<p>With business partners: collective action in or beyond the same industry, e.g., driving shared supplier requirements</p> <p>Through bilateral engagement: with one or more other actors, such as government, business peers, an international organization or a civil society organization</p>
Multi-stakeholder	<p>Collaborative action: collectively with business peers, governments, international organizations and civil society organizations, e.g.: driving shared supplier requirements, using convening power to address systemic issues</p>

3 External benchmarking and opportunities for improvement

The World Benchmarking Alliance outlines five benefits of benchmarks:

Benchmarks clarify what stakeholders expect from industries and companies

Companies often deal with a wide range of stakeholders that have diverging expectations and priorities. Using an extensive multistakeholder consultation process, benchmarks can identify common ground among key stakeholders and build consensus on these expectations. Benchmark methodologies can then translate these expectations into clear metrics, providing companies with a path forward.

Benchmarks clarify where and how companies can contribute to sustainability

Benchmarks clarify the role of companies in achieving particular SDGs and also highlight the responsibilities of other stakeholders. This in turn helps companies prioritize action, which maximizes their contribution in a way that is efficient and effective. Provided they are robust and credible, and provide fair and considered analysis, benchmarks are powerful tools to raise awareness on an issue and shape the debate on what industries can do about it.

Benchmarks promote a race to the top

The rankings that stem from benchmarks leverage the forces of competition to improve corporate performance; leaders find motivation to do more, while laggards aim to catch up. The cyclical nature of benchmarks provides companies with a strong incentive to improve and show progress over time. Top performers can use the results as a source of competitive advantage while those lower in the rankings can use them as a “wake-up call”.

Benchmarks help track progress

The routine issuance of rankings helps to show progress, both relative to peers and to societal expectations.

Benchmarks promote dialogue and are a proven and effective engagement tool

Providing all stakeholders with easy-to-use, reliable and comparable information empowers individuals and organizations to exert their full influence to improve corporate sustainability performance. Both investors and civil society frequently use benchmarks and rankings to engage companies and promote corporate change.

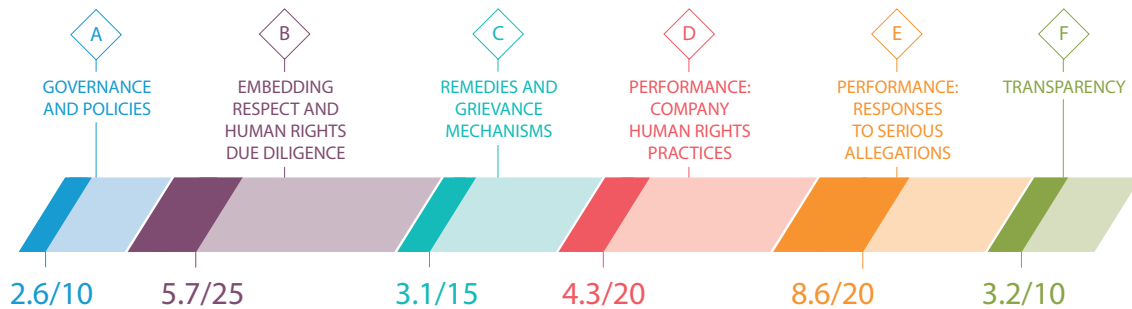
How can agribusinesses do well in the benchmarks?

Publicly share policies, approaches, supply chain maps and progress as benchmark scores are based on publicly available information.

The purpose is to encourage transparency and external reporting, and aid rights-holders to seek remedy. In the 2019 [Corporate Human Rights Benchmark](#) (CHRB), more than half of agribusinesses were in the lowest performance bands (0 to 20%), indicating a failure within the sector to implement the UNGPs. The CHRB picks the companies to benchmark (based on their ability to influence sector change), assesses them and then shares the result with the companies. If the CHRB missed any publicly available documents, the company can tell CHRB, which then adapts the score. Low scoring companies that do not demonstrate a willingness to improve over subsequent benchmarks expose themselves to increased scrutiny in the media and in shareholder resolutions.

Figure 7 depicts the 2019 corporate human rights performance of 200 of the largest global companies in four high-risk sectors (agricultural products, apparel, extractives and ICT manufacturing). The graphic shows average score by measurement theme (darker color blocks indicate proportion achieved).

Figure 7: The CHRB assessment⁵



Adopt a human rights due diligence approach

Benchmarks not only assess policies and process but also document action indicating that companies “know and show” human rights impacts and have taken steps to mitigate or prevent human rights abuses and provide effective remediation. Benchmarks look for publicly reported information; some agribusinesses received lower grades because they did not adequately document and publish actions. For example, responsible recruitment and effective remedy scored the lowest in the 2018 [Know the Chain](#) Food & Beverage benchmark; 18 out of 38 companies had a policy in place prohibiting worker-paid recruitment fees; only four required reimbursement of fees; and no company disclosed evidence that fees had been reimbursed. Where companies provided details on commodities, disclosure focused on palm oil and, to a lesser extent, cocoa, despite the fact that numerous other commodities present risks.

Embrace the link between environment and social risks and impacts

Climate change is catastrophic for the human rights of vulnerable people living in small island states, on marginal land (low agricultural worth), and in the path of typhoons and hurricanes. Starting in 2023, the [World Benchmarking Alliance](#) with [Influence Map](#) will rank the 2,000 most influential food and agricultural businesses (from agricultural inputs to retailers) using the [Food and Agriculture Benchmark](#). This looks for improving performance on seven systems transformations that the alliance believes are vital to putting society, planet and economy on a more sustainable and resilient path. These transformations are decarbonization and energy, food and agriculture, urban, digital, circular, food and agriculture, and social. The alliance will release the social and human rights indicators in 2021, aiming to align them with the CHRB.

REVIEW THE FEEDBACK ON RETAILER PERFORMANCE

Oxfam moved from the [Behind the Brands](#) campaign on food and beverage agribusinesses to the [Behind the Barcodes](#) campaign on food retailers. The report, published in 2019, highlights concerns about the agribusiness supply chain, particularly issues of transparency to consumers; living wages and incomes; gender equality; and unfair trading practices. At the same time (March 2019), Oxfam America produced the [Agribusiness scorecard](#), which assesses how an agribusiness company has responded to customer concerns.

On average, the global agribusinesses scored lowest on small-scale producers. The second lowest scoring theme was transparency and accountability, underscoring the position of agribusinesses as a bottleneck in the flow of sustainability information. Average scores on women fell in the middle. The highest scoring theme on average was climate, followed by land, showing that many already had some reporting transparency with organizations such as CDP. The report identified eight actions for agribusiness:

1. Disclose the names of suppliers for key commodities beyond palm oil.
2. Call on and encourage their agribusiness suppliers and business partners to strengthen policies related to women's economic empowerment, land rights, greenhouse gas (GHG) emissions, deforestation, living incomes for small-scale producers and human rights.
3. Encourage agribusiness suppliers and business partners to publish time-bound action plans for the implementation of these policies and to publicly report on progress.
4. Report on supplier performance through the company's regular public communications, prioritizing those within high-risk supply chains.
5. Enable buyers within the company to implement commitments, for example by establishing related key performance indicators and fully integrating provisions into supplier management systems.
6. Translate their own commitments into the languages of sourcing countries and ensure this information is publicly available.
7. Improve training for suppliers on key issues related to women's economic empowerment, land rights, GHG emissions, deforestation, living incomes for small-scale producers, and human rights and ask that they adapt and extend this training to their own suppliers.
8. Continue to develop and improve commitments and actions to ensure the company is tackling relevant issues.

4 Strengthening company performance on human rights

We have structured this section to reflect the six steps outlined by the UNGPs as human rights due diligence. It provides select baseline elements for each, strong case studies and recommendations for continuous improvement. The UNGPs reporting framework is a helpful resource in developing a business approach.

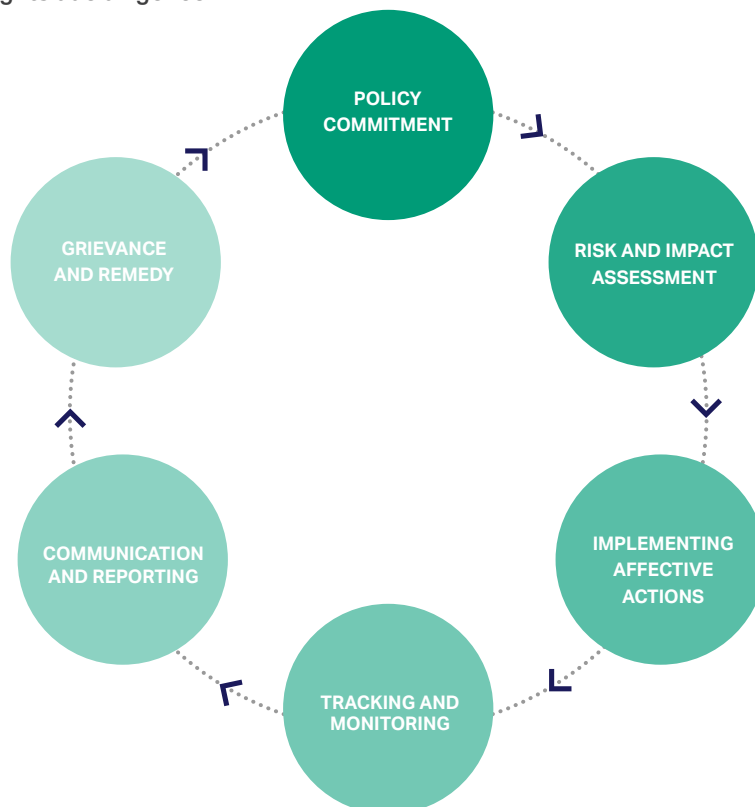
Human rights due diligence is a way for enterprises to proactively manage potential

and actual adverse human rights impacts with which they may be involved. The expectation is that human rights due diligence is an ongoing and iterative process that supports all stages of business development, providing a lens for monitoring and appraisal.

The main purpose of due diligence is the prevention of adverse impacts on people. It should be ongoing, as the risks to human rights may change

over time; and meaningful stakeholder engagement, in particular with the affected people, human rights defenders, trade unions and grassroots organizations, should inform it at all stages of the process. There is no single way to conduct human rights due diligence; companies can adapt and enhance existing processes that best suit their operations and exposure to human rights risk.

Figure 9: Human rights due diligence



Step 1: Agribusiness human rights policy and commitment

Supporting the business to move from an ethical compliance approach to a broader human rights approach starts with defining what the business means by its human rights approach. Companies often write this as a policy and include all parts of the business including suppliers. The UNGPs recommend stating whether policies are standalone or integrated and indicate that they should at a minimum comprise:

- An explicit commitment to respect all internationally-recognized-human rights standards; this includes, at a minimum, the International Bill of Rights and the International Labour Organization's Declaration on the Fundamental Principles and Rights at Work.
- Requirements concerning what the company expects from personnel, business partners and other relevant entities directly linked to its operations, products or services.
- Information on how the company will implement and govern its commitment.
- The communication of all policies to the stakeholders in the scope and confirmation that the stakeholders understand them.

- Developing a human rights policy can be a dynamic, though not always a predictable, process. Do not expect perfection at first.
- Assign senior management responsibility to drive the process.
- Involve cross-functional personnel (human resources, legal, procurement, security, etc.) in the process to build understanding, know-how and a sense of common purpose.
- Identify and draw on internal and external human rights expertise.
- Map existing company policies to identify human rights coverage and gaps.
- Conduct a basic mapping of the company's key potential human rights impacts.
- Consult internal and external stakeholders to identify and respond to their expectations.
- Engage the board in understanding the challenging areas to implement.
- Communicate the policy internally and externally; the policy should be publicly available.

- Reflect human rights policy in operational policies and procedures that govern wider business activities and relationships.
- Most importantly, do vulnerable rights-holders impacted on understand the policy and how to raise concerns?

Some useful examples

- [Nestlé Responsible Sourcing Standard](#): focuses on continuous improvement and clarifies requirements in terms of time adherence
- Unilever videos: [Clarifying senior leadership human rights commitment and expectation](#)
- Coca-Cola [human rights poster](#) and [leaders guide](#)
- GBI advice on [human rights internal training](#)
- Total: [Human Rights Guide](#) and [purchasing principles](#)
- Olam: [Supplier Self-Declaration](#)

Figure 10: Workplace contract⁶

Visuals to support the communications of your company's human rights policies can help (such as these developed by Creative Contracts)

INDUCTION

Probation start date: DD / MM / YY

OCCUPATIONAL HEALTH AND SAFETY

6

7



Case study: Bayer - Engaging the board

How did you go about engaging the board?

In 2019, Bayer repositioned itself, incorporating a sustainability strategy as a core element of our corporate approach to doing business. So as a business it is now addressing the major challenges of the times, such as climate change and the loss of biodiversity, and strengthening the societal impact of our company. It established an independent Sustainability Council consisting of external sustainability experts that advises the Board of Management and other functions within the company on all sustainability matters.

This will help the company further develop sustainability measures and commitments and put in place robust governance to bring everyone at Bayer behind its ambitions.

From 1 January 2020, the Chairman of the Board of Management also became the company's Chief Sustainability Officer, with sustainability and human rights among his responsibilities. From 2021 onwards, Bayer will include measurable sustainability targets in the compensation of its management and Board of Management.

How have you developed the communication strategy to make sure vulnerable rights-holders understand the policy and how to raise concerns?

Bayer fully supports and respects human rights. In 2015, it documented its position in the [Bayer Human Rights Policy](#), a globally binding corporate policy.

In 2020, Bayer plans to revise the policy, building on internal stakeholder expertise and lessons learned and engaging with external stakeholders who represent vulnerable rights-holders to test the policy. A member of the Board of Management will formally sign off on this.

What would your top tip be for other GAA members?

Top management approval and the involvement of internal and external stakeholders is a helpful approach that Bayer recommends when developing a human rights policy.



Step 2: Human rights risk and impact assessment (HRIA)

There are several stages to a risk assessment process. Not all steps may be necessary in all cases. For example, you can assess a short supply chain or one involving few suppliers or sites more simply. The best approach to adopt will depend on your company, its supply chain and the resources available.

- The UNGPs recommend the following for HRIAs **Companies must identify and assess any negative impacts on human rights with which they may be involved.** This includes: 1) actual impacts (past or current) and potential impacts (those possible in the future); and 2) the direct or indirect cause of impacts from the company's own activities and from its business relationships.
- The focus must be on risks to the human rights of people, as distinct from risks to the business itself, although the two are increasingly related. It needs to be an ongoing process, repeated whenever risks to human rights may change substantially, such as an annual review; new business changes (new operations, mergers and acquisitions); force majeure (COVID-19, conflict, environmental disasters, financial crisis); etc.

Figure 11: Human rights risk assessment process steps

Map company supply chain	<ul style="list-style-type: none"> • Mapping can involve requesting information (including location) from sites, direct suppliers of goods and merchandise, including out-growers/smallholders, service providers (e.g., outsourced cleaners or logistics), suppliers of goods not for resale, and labor providers (e.g., agencies) used at all levels of the supply chain
Review high-level risks	<ul style="list-style-type: none"> • Country risk: sourcing from or operating in countries with conflict, corruption, weak rule of law, insufficient land rights, weak economy, social norms, high migration, environmental concerns and where it is difficult to voice concerns • Workforce vulnerability: use of low-skilled, seasonal, migrant labor or workers on contract from a third-party. Likelihood of children, women and marginalized groups. • Industry: presence of dangerous machinery, pesticides, heavy lifting, housing, limitation on movement, withholding pay
Understand supplier profile	<ul style="list-style-type: none"> • Site profile and management: type of or no locations, presence of worker welfare facilities, quality of management, production cycle, community relations, use of third-party contractors and labor providers • Workforce profile: recruitment, types of contract, payment method, presence of union/worker representation, grievance record • Commercial relationship: financial resources, length and significance of commercial relationship, length of time business has been trading
Assess and prioritize	<ul style="list-style-type: none"> • Identify direct and indirect causes and impacts • Rank by severity and likelihood of impact on individuals to determine saliency • Consider leverage
Develop action plan	<ul style="list-style-type: none"> • Validate the risk • Time-bound actions



Case study: Cargill - Human rights risk assessment

How does Cargill approach human rights risk assessment?

Cargill regularly implements a corporate-level forced and child labor risk assessment involving a cross-disciplinary team from law, compliance and ethics, corporate responsibility, sourcing and sustainability roles in line with its [Commitment on Human Rights](#). The team takes guidance from the UNGPs and the International Labour Organization Fundamental Principles and Rights at Work to examine external data sets (e.g., US Department of Labor Bureau of International Labor Affairs (ILAB) resources and State Department Trafficking in Persons reports) to understand geographical risk by human rights issue, plus Cargill's site and supply chain data. Human rights in cocoa-growing communities is a salient risk due to a lack of access to basic services and inadequate infrastructure, food insecurity and limited educational opportunities.

How did Cargill address these risks?

Addressing risks and the appropriate remediation is embedded in commodity-specific certification standards, voluntary initiatives such as Cocoa Action, and commitments, including the Cargill Cocoa Promise. As a partner in the International Cocoa Initiative (ICI), Cargill co-developed and applies a Child Labor Monitoring and Remediation System (CLMRS) that uses coaches to undertake farm visits. The next step is to scale the CLMRS to all 150 cocoa growing communities in Ghana and 120 cooperatives in Côte d'Ivoire, accounting for almost 100% of Cargill's direct supply in those countries. By 2025, Cargill will have introduced a monitoring and remediation system in the five countries where it sources cocoa directly – Brazil, Côte d'Ivoire, Cameroon, Ghana and Indonesia.

What is the role of business in addressing these risks?

Cargill has an important opportunity to support government in tackling the root causes of human rights risks such as child labor by leveraging its operational presence to align remedial action to rural development planning priorities and complement national child protection systems. For example, Cargill works with the Ivorian Ministry of Education to ensure vulnerable community access to infrastructure and qualified teachers.

What would be your top tip for peer agribusinesses?

Data collection and sharing is key to pinpointing risk, targeting underlying causes and driving lasting, systemic change. Cargill also partners with organizations such as CARE, Save the Children and ICI to strengthen cocoa-growing communities.

Some useful examples

- Institute for Human Rights and Business (IHRB) [checklist](#)
- Nestlé: [Labour Rights in Agricultural Supply Chains: A Roadmap](#)
- Heineken: [Due Diligence Model](#)
- Coca-Cola [supplier toolkit](#), which includes a simple HRIA on page 15
- Food Network for ethical trade: [Members Collaborate on Common Risk Assessment](#)

Step 3: Taking action – mitigation and remediation

Developing actions to reduce or prevent adverse potential impacts on rights-holders is called mitigation. Where human rights abuses or environmental impacts have occurred, you should take immediate steps to put the situation right through remediation. Where this is not possible (e.g., death) remediation can involve compensation or other forms that try to make amends for the harm caused. This might involve apology, compensation, changing practices, and protection from further harm. Engagement with the victims/ victim's family is paramount to avoid further harm and to understand what they see as appropriate remediation.

The UNGPs recommend the following for mitigation and remediation:

- Integrate the findings of human rights impact assessments across internal functions and processes.
- Act to mitigate and prevent the impacts identified and counteract or make good any human rights harms that have occurred.

- Ensure remedies try to directly address the impact that has occurred. **It's important to engage with the affected rights-holders – what do they consider an effective remedy for the impacts suffered?**
- Have the internal budget, decision-making and oversight processes in place to enable effective responses.

The most important considerations are:

- Take immediate action to remediate actual abuses or impacts that are occurring.
- Understand the root cause of the impact and identify specific actions that will address the causes. Prioritize these and develop Specific Measurable Achievable Realistic Timebound (SMART) objectives that will enable you to measure how effective your actions were: what worked and what did not. Ensure the actions do not have unintended consequences or make the situation worse.

- Work collaboratively with suppliers, sites, farmer groups and other stakeholders on the actions so they have a better chance of implementation.
- Support training and capacity building on worker-management, communication and negotiation.
- Engage and collaborate with others (e.g., other companies, trade unions, government agencies, NGOs, experts, multistakeholder initiatives) so the suppliers, sites, farmer groups and other stakeholders hear a common message.
- Identify the necessary resources to implement the plan and establish key performance indicators with clear timescales and accountability.



Case study: Illovo Sugar Africa - Land rights

Illovo Sugar Africa, an AB Sugar company, operates in six African countries and sources over 50% of its sugarcane directly from growers. Building sustainable supply chains in a context of climate change and poverty is an imperative for the business. Many growers supplying the business did not have secured land tenure. Without secured land tenure, growers are reluctant to make the necessary investments in their land to improve productivity and cannot access finance as they are not able to use land as collateral. In this context, women are particularly vulnerable. Furthermore, most growers lack not only the financial resources but the technical support necessary to secure and protect their land rights.

There are three elements to Illovo's strategy to address land issues

Support growers in securing land tenure, allowing growers to access their collateral for investment and allaying fears of land encroachment or confiscation.

Under growing pressure on available land resources, promote vertical expansion through agricultural best practices and the application of technologies such as irrigation.

Encourage resource stewardship and responsible land use. The company worked on building partnerships with reputable international NGOs such as Landesa, local civil society organizations and donor agencies. In each country, Illovo's operations evolve in different social and regulatory environments; each business implemented the strategy in a context-specific way.

Through innovative partnerships, the company has so far delivered significant impact. For example, in Mozambique it worked with USAID to map over 1,800 parcels and issue land certificates to 1,642 growers and landholders, of which 1,084 were women.

Top tips for other businesses

- Address issues inherent to your business; in the case of Illovo, land made the most sense as the primary means of production.
- Partner with reputable experts from civil society.
- Link your efforts to existing government approaches; do not work in isolation.

Some useful examples

- Fairtrade: [living income model](#)
- Ethical Tea Partnership: [Malawi Tea 2020](#)
- Mars Farmer Income Lab [research on best practices](#)
- [Dutch Banana Retail Commitment on Living Wage](#): by 2025, to reduce the gap between currently paid wages and the living wage for their entire banana assortment by at least 75%
- Tony's Chocolonely: [Living Income model](#)
- IDH [Taskforce for Coffee Living Income: Strategy Handbook](#)



Case study: Philip Morris International - Tackling child labor

What is the issue?

Child labor affects over 150 million children worldwide, mainly in agriculture. Child labor is unacceptable to Philip Morris International (PMI) and since 2011, it has been implementing the Agricultural Labor Practices (ALP) program to eliminate child labor and achieve decent livelihoods for all contracted farmers in its tobacco supply chain.

The cornerstone of the ALP program is a robust monitoring system performed across 22 countries by over 2,800 field technicians. They visit the farms regularly to ensure the implementation of the ALP code and identify and address issues requiring immediate remediation.

In 2018, PMI triangulated data from its monitoring (currently covering 92% of our 335,000 farmers), external assessments and grievance mechanisms to focus on solving the root causes of its most salient human rights issues. Child labor being one of them, PMI publicly committed to eliminating it by 2025.

How is PMI approaching the root cause of child labor?

PMI is taking a holistic approach to tackling the main root cause of child labor: poverty. Several initiatives have been designed to increase farmer income and the company has also committed to ensuring that all contracted farmers make a living income by 2025. This work is a key enabler to address systemic social issues such as child labor.

The identification of an incident in locations with prevalent child labor triggers a remediation process. Following a case-by-case analysis, PMI has introduced targeted interventions, including training, women's empowerment activities, school-feeding programs, after school activities, vocational training and e-literacy classes for older children.

What does PMI recommend to other companies looking to eliminate child labor in their supply chains?

It is every company's responsibility to address its social and environmental impacts throughout its value chain. However, overcoming such systemic challenges requires collaboration and partnerships with all stakeholders.





Case study: Olam - Providing safe spaces for children during the hazelnut harvest

What is the issue?

Turkey's hazelnut harvest attracts a large migrant workforce. Every summer, they typically travel in family groups to work on farms in the Black Sea region, often without employment contracts or having received any occupational training. With no "safe space" for their children to stay while they work, the extra pair of hands available makes child labor an ever-present risk on the farms.

How have you gone about addressing it?

As a leading supplier of natural and semi-finished hazelnut products grown in Turkey, with strong relationships with about 4,500 farmers, Olam's Edible Nuts business has partnered with the International Labour Organization to set up Summer Schools that immerse the children of migrant workers in a month-long academic and social program that includes academic classes like mathematics, English and science to support their school work, as well as creative workshops and sports activities. It also provides regular meals

and transportation from their villages to schools.

Working as eyes and ears in the field, Olam social workers identify children and their parents to refer them to the Summer Schools, as well as educating the workers, farm owners, labor contractors and local authorities on the legal framework in attempt to eliminate child labor from the farms. In 2019, all 1,600 workers in Olam's sourcing villages received 1:1 training.

Since Olam joined the Summer School program in 2015, the number of schools has grown from 1 to 6, boosting annual child participation from 30 to over 488 during the 2019 harvest period. FLA assessments credited the Summer Schools for a decline in child labor, with the ratio of children working in the hazelnut farms in 2018 the lowest in years, at 6%. (Source: Fair Labor)

What is the business role? How do you bring others together to address driving factors?

Attracting the children and securing their regular

attendance at the Summer Schools remain a challenge.

Olam plans to increase the impact of Summer Schools with the cooperation of local authorities and the International Labour Organization, encouraging wider action to prevent child labor in the sector. Olam reports the impact of its child labor prevention efforts through AtSource+, Olam's sustainable sourcing platform. It connects customers via multiple socio-economic metrics to the work it and its partners are doing to improve labor practices and working conditions in its supply chains, and offers the opportunity to join Olam in its bid for greater impact.

What would be your top tip to other GAA members?

It is necessary to both protect children from harm and support their rights to play and ultimately be children. To ensure programs like these are successful in keeping children in a safe space, it is necessary to provide engaging and educational activities and tailor them to specific age groups and their respective interests.

Some useful examples

- Olam, Nestlé, Balsu: [Fair Labor Association's Social Impact Assessment of Nestle's, Olam's and Balsu's Programs in Turkey](#)
- Stronger together: [Modern slavery training](#)
- M&S: [Modern slavery toolkit](#)



Case study: Bunge - Tackling forced labor in global supply chains

Why is forced labor an issue?

A complex human rights issue, evidence shows that vulnerable, poor and migrant workers are the most susceptible to forced labor in a context of language barriers, lack of sustainable jobs and education, as well macro socio economic and socio-political issues in some countries/regions.

How have you gone about addressing it?

Bunge strives to maintain a non abusive environment in all value chains where it operates by upholding strict compliance standards, from local and internationally recognized conventions, to projects and activities that root out cases of abuse. Bunge works with multistakeholder forums, industry experts and international NGOs to provide its suppliers with awareness programs to strengthen their understanding of the issues and mitigation approaches.

Additionally, Bunge's Labor Transformation Program – run in partnership with Earthworm Foundation – focuses on bringing suppliers to no deforestation, no peat and no exploitation (NDPE) compliance via focused, one-on-one engagement with them on a long-term basis. The program concentrates on four key areas: employment contracts, recruitment practices, grievance mechanisms and freedom of movement. The program consists of on-the-ground assessments, worker interviews, awareness building and mentoring and concludes with an action plan and toolkit to address gaps. Bunge identified the four key areas via industry collaborative findings compiled through an overarching report. It has also worked closely with Embode to assess the human rights approach within the Nepal-Malaysia migration corridor.

What is the business role? How do you bring others together to address driving factors?

Bunge approaches the issue of forced labor by taking responsibility for its entire workforce.

Bunge's NDPE policy applies to its internal workforce and all of its suppliers.

It also encourages suppliers to adopt due diligence processes for newly recruited workers using a toolkit co-created with Earthworm Foundation. To address specific issues like passport retention, Bunge provides secure locker systems on its operation sites that are accessible to workers 24/7. Suppliers have replicated this approach.

What would be your top tip for peer agribusinesses?

Multistakeholder collaboration is critical to addressing forced labor beyond the private sector's sphere of influence. Bunge works with government agencies via multistakeholder forums to share data and advocate for the use of a mandatory national certification system in alignment with international standards. Bunge also engages continuously with suppliers to transform supply chains.

Step 4: Tracking and monitoring

Enabling root causes of human rights issues to be addressed involves long term mutual partnerships, not a compliance “policing” mindset. Audits can provide important snapshots in time but are not enough, on their own, to address improvements in supplier performance. Focus must be on building capacity and engagement and on addressing the salient human rights issues.

The UNGPs recommend the following for tracking and monitoring:

- Tracking and monitoring enables a company to know whether its human rights due diligence has worked and is central to any continuous improvement and change process.
- Collect the right data, triangulate data sources, analyze evidence, learn lessons, prioritize the next actions and long-term prevention.

Social audits/assessments:

The traditional way to validate and investigate risks has been to undertake social audits or to add social questions to existing internal assessments, such as farm visits. Many audit

programs already focus on high-risk suppliers, with risk determined by the results of previous audits. However, many companies recognize that audits have limitations when it comes to assessing the extent of important risk issues, such as forced labor, sexual harassment, freedom of association or community grievances. These are harder to identify in the limited timeframe of an audit, especially as workers may be unwilling or unable to discuss them openly and engagement with communities may be outside the audit’s scope.

Community insight:

Some agribusinesses are also adding external verification to their audits, connecting with rights-holders in supply chains (workers, farmers, spouses, children, as well as community leaders) to get valuable insights. This method of data triangulation with any grievance data can provide a more accurate picture of the situation on the ground to enable more targeted interventions.

Specialist type of assessment:

It may be better to undertake a more specialist type of assessment that is able to both corroborate the initial risk assessment and reflect the reasons for the specific risk issues by analyzing the local situation and engaging

more deeply with stakeholders. This sort of assessment is not compliance-focused but seeks to identify the underlying causes of the risk to find actions to address them. Some companies and NGOs now recommend undertaking detailed HRIAs on the most serious risk issues. These sorts of studies should involve engaging with a wide group of stakeholders, including workers and local communities, undertaking on-the-ground research and understanding the social and economic drivers behind difficult human rights and environmental impacts. You can conduct these in a variety of contexts and using different methodologies.

Real time monitoring:

The use of apps to engage workers on worker satisfaction, job quality, well-being and safe migration can also provide useful insights for businesses, NGOs and workers to continually improve worker experience and productivity and minimize exploitation.

Tracking:

When developing company-specific indicators, there are three types of information that companies can use to track and report on their human rights performance: processes/inputs, incidents and outcomes/impacts.

Figure 12: Types of information that companies can use to track and report on their human rights performance

<p>Processes the company has in place to carry out human rights due diligence and provide remedy</p>	<ul style="list-style-type: none"> • Description of salient issues • Description of supplier audit or assessment program • Description of grievance mechanisms • Description of training in human rights that employees receive
<p>Results of monitoring of instances of negative impacts</p>	<ul style="list-style-type: none"> • Reported grievance issues raised and resolved • Lost time injury frequency rate • Incidences of child labor
<p>Outcomes and impacts of broader mitigation programs</p>	<ul style="list-style-type: none"> • Progress on closing living wage or living income gap • Movement of women into supervisory and leadership roles • % of supply chain workers covered by collective bargaining

Step 5: Communicating and reporting

Understand the company purpose behind communicating and reporting on human rights: is this to influence internal buy in, respond to increasing public interest and stakeholder expectations, or facilitate the sharing of good practice? As discussed earlier in the guide, no doubt part of the reason will be to meet the increasing external expectations for a company to be transparent with progress and challenges.

The UNGPs recommend the following for communicating and reporting:

Companies should be able to “know and show” that they respect human rights: meaning the company should be prepared to demonstrate the effectiveness of its efforts through **proactive communication with affected stakeholders** and others.

In developing a communication strategy, the key focus is to be clear on who the audience is, the purpose and the most effective format. Questions to aid effective communication can include:

- **Why** is the company communicating on human rights?
- How does the **company's governance structure** supports the management of human rights risks?
- How are the company's policies and processes **making a difference to practices and outcomes with clear and relevant examples?**
- How does the company gain the **perspective of stakeholders who it could negatively impact?**

- Does the communication discuss **complex or systemic human rights challenges and how the company is grappling with them?**
- Does the communication contain **metrics that offer clear and relevant evidence** to support the narrative?
- Does the communication recognize the **need for collaborative effort with others?**

Some useful examples

- UN [Guiding Principles Reporting Framework](#)
- Aim-Progress: [Business Toolkit](#)
- M&S: [Modern Slavery Toolkit](#)
- IHRB [Checklist](#)
- Unilever: [Human Rights Report](#)
- Body Shop: [Modern Slavery Statement](#)
- The Body Shop: [Modern Slavery Statement](#)



Case study: Sime Darby - Monitoring and reporting on human rights

How does Sime Darby Plantation (SDP) monitor Human Rights Issues?

SDP established a Human Rights Task Force in 2015 to strengthen issue identification, management and governance of actions to uphold human rights across the company's operations. This task force reports to the Sustainability Committee, which in turn reports to the main Board of Directors.

Mills and estates undergo an independent auditing process to ensure compliance with human rights considerations and certifications to mitigate forced labor vulnerabilities. SDP also conducts assessments across operating units to identify salient issues. The company maps these issues on its heat map, which helps prioritize focus areas for improvement. For example, it identified the recruitment of migrant workers in Malaysia as a salient issue and has implemented improvement plans for responsible recruitment practices.

Suppliers must adhere to strict no-exploitation commitments through responsible sourcing guidelines. When SDP finds issues, it reports them in a Supplier Grievance Register and makes them publicly available on its [website](#).

How has your approach evolved beyond audit, for example community-based monitoring, real time rather than annual, use of NGOs?

In 2018, SDP launched a third-party worker helpline called Worker's Voice to strengthen existing grievance mechanisms. It is a collaborative initiative with Nestlé, the Responsible Business Alliance, and ELEVATE.

This independent platform, available throughout the day, in multiple languages and accessible via call, text and Facebook Messenger, is toll-free and enables workers to raise concerns for swift action. The helpline's reporting dashboard enables salient issues to be identified, determining the likelihood of occurrences, and scaling effective remediation.

SDP's Human Rights Task Force reports regularly to the sustainability committee at the Board level and engages with key functions throughout the whole business. This broader insight has encouraged a holistic approach to governance while at the same time ensuring operational implementation.

The Human Rights Due Diligence program is different from an audit; it helps SDP assess gaps, identify salient risks and best practices, and prioritize improvement plans that can address common issues at scale and ensure action is always people-centric.

Given that many human rights issues are bigger than one company, SDP partners with a multitude of stakeholders to solve complex, systemic issues within the palm oil industry. Pre-competitive collaborations such as the Decent Rural Living Initiative bring like-minded palm oil producers together to tackle labor rights challenges in Indonesia.

How do you report and use metrics that measure impact, not just activity?

SDP's Sustainability Reports aim to deliver an honest approach to reporting and maintain the highest levels of disclosure for its stakeholders. The company

measures progress against set targets, as well as achievements. This has enabled SDP to identify gaps and revisit targets in determining how best to produce results.

Since 2015, SDP has also reported its impact and activities through the UK Modern Slavery Act Statement, which it publishes on its website. The statement reports on progress made specifically on forced labor indicators assessed in its operations.

Why is SDP transparent about progress?

As the world's largest producer of certified sustainable palm oil, SDP believes it has a responsibility to demonstrate transparent monitoring and reporting so it can identify gaps and push for continuous improvement. Transparency also allows SDP the space needed to acknowledge its challenges and approach issues honestly and paves the way for industry and multistakeholder collaboration.

What would be your top tip for other agribusinesses?

Issues such as transparency and traceability are relevant to all agribusinesses. Forced labor is not unique to any one company or industry. These complex human rights challenges are interrelated and it is important to approach human rights beyond your own business and find collective solutions to address issues using a worker or rights-holder lens.

Step 6: Implementing effective actions – grievance and remedy

How a company deals with grievances gets to the heart of respect for human rights.

UNGP's advice for grievance and remedy

- Stakeholders and international standards expect companies to focus on righting the wrong, achieving a meaningful outcome – and effective remedy – for affected people.

- The focus should be to make it possible to address grievances early and remediate them directly; companies should establish or participate in operational-level grievance mechanisms.
- To ensure their effectiveness, non-judicial grievance mechanisms should be **legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning and based on engagement and dialogue.**

There is no prescribed standard for a grievance procedure; the form and structure will differ depending on the **target group**, **the level** (workplace, company's extended supply chain, project or sector solution) and **the scope** (general or a specific grievance).

See Figure 14 below for the typical grievance procedure.

Figure 13: Typical grievance process

Initial assessment of the complaint	<ul style="list-style-type: none"> Gather information from all parties in a timely manner, with complete information, based on thorough enquiry into the issues. Questions to establish the legitimacy – has someone raised the issue before?
Internal investigation	<ul style="list-style-type: none"> Conduct an internal investigation which may involve an independent third party.
Consultation and mediation	<ul style="list-style-type: none"> Following receipt of information from all parties, the managing organization of the grievance should seek where appropriate to promote discussion and dialogue between the relevant parties to the satisfaction of the affected people.
Internal review	<ul style="list-style-type: none"> Conduct an internal review and put processes in place to minimize the risk of it occurring again.

Most importantly, the target group MUST be able to access it and they MUST:

- Know **how the process works** and how they can lodge a complaint.
- Know that **they can trust in the process** and feel comfortable using it (without fear of intimidation, harassment and with the right support for sensitive matters, such as sexual harassment).
- Be confident that the company will address their concerns** because it has a track record and communicates regularly on what it is learning and how it is adapting to minimize impacts.

Figure 14: Example grievance procedure from Golden Agri-Resources



Home >> Grievance Procedure

As part of Golden Agri-Resources' (GAR) commitment towards transparency and open and inclusive dialogue with stakeholders, the company has established a Grievance Procedure which can be found on its Sustainability Dashboard.

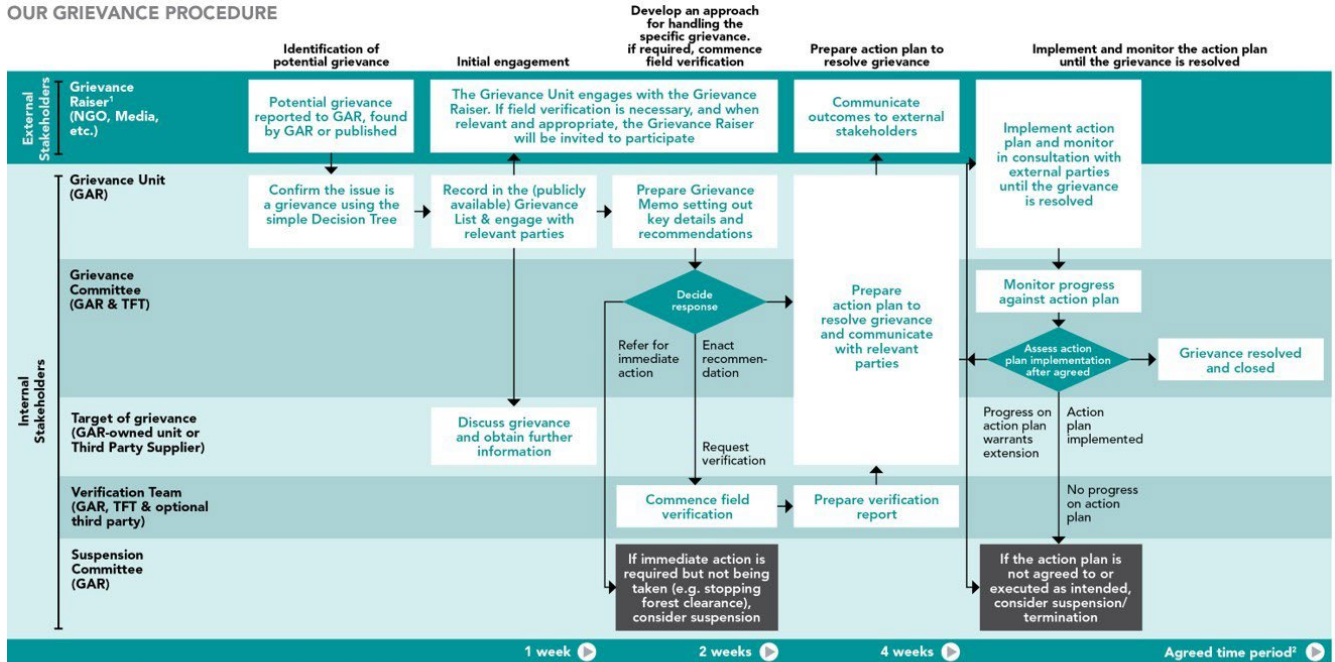
This is to ensure that, as a company, GAR is responsive to grievances from external parties. This includes any individuals, government organisations, NGOs or media outlets with concerns related to the implementation of GAR's sustainability policies. GAR values the input of stakeholders in helping to achieve the aims of the policies and in enhancing transparency throughout its supply chain.

Underpinning this procedure is the desire to respond quickly to any grievance raised and engage in dialogue with stakeholders, as set out in the Grievance Process Diagram below. GAR will be providing regular progress updates via the Grievance List which is also published on the Sustainability Dashboard.

- [Grievance List](#)
- [Field Visit Report](#)
- [GAR Site Visit Report at PT Surya Panen Subur-II](#)
- [GAR Site Visit Report at PT Ensem Sawita dan PT Agra Bumi Niaga](#)
- [GAR site visit report at PT Dua Perkasa Lestari \(PT DPL\)](#)
- [GAR Site Visit Report on Grievance involving PT Indo Sawit Perkasa](#)

<https://goldenagri.com.sg/sustainability-dashboard/grievance-procedure>

OUR GRIEVANCE PROCEDURE



¹ The Grievance Raiser may nominate a third party to act on their behalf.
² Action plans will work to agreed timelines of no more than three months to reach resolution. However, where circumstances prevent resolution within that time – for example, where legal proceedings are involved – progress at three months will be reviewed to assess whether there is clear evidence of a resolution process being actively implemented.



Case study: Golden Agri-Resources - Grievance systems

How did Golden Agri-Resources (GAR) establish its grievance handling process?

GAR has multiple grievance systems. It has one to report human rights and labor rights in its own operations; it has a whistle-blower system to report breaches of GAR's code of conduct; and it has a system for supply chain grievances. A company-wide standard operating procedure (SOP) manages all of these. GAR established them in 2015 with multiple channels for reporting. Staff register grievances in a database to monitor progress at the site level. Handling of grievances in line with the SOP is a key performance indicator for GAR's Operations Management team.

Why is it important?

The database provides the top management team with insights into the issues that arise and whether they are systemic. It offers a platform for continuous learning from previously reported cases.

How do you monitor and investigate?

GAR monitors grievances through the online grievance database and an annual social impact assessment site visit that focuses on grievances. It conducts investigations through site visits, especially for grievances related to suppliers. In cases of financial misconduct, GAR maintains a special investigations team. The company aims to resolve grievance cases locally and only elevate them to the head office when this avenue has not been successful.

How has the learning informed your human rights approach?

The majority of the issues raised for both GAR and supplier sites are simple to resolve and relate to lack of personal protective equipment (PPE), wage discrepancies and local pollution (for example, spillage of wastewater); but some are more complex human rights issues, such as land taken without consent, where GAR or the third-party supplier has needed to put in place robust remediation programs.

Why is Golden Agri-Resources so transparent about progress?

GAR is serious about respecting human rights. The company wants rights-holders to raise concerns so it can help resolve them as quickly as possible. Key to achieving this is being transparent about sites and supply chain locations, and the issues raised and resolved. Complex human rights issues are often bigger than one organization and GAR needs to collaborate with other organizations in the same geography to address root causes.

What would be your top tip for other agribusinesses?

Work with experienced organizations to understand what the overall issues are and where your individual company stands. Do not tackle everything at once and too quickly; complex human rights issues often require civil society and government involvement. Focus on the "quick wins" that are under the company's sphere of influence. It is good practice to form a dedicated team for implementation comprised of individuals who are familiar with local regulations.

Some useful examples

- Golden Agri-Resources [Grievance Handling](#) and example investigation report
- [RSPO online tutorials](#)
- M&S: [Supply Chain Grievance Process](#)
- Aim-Progress: [Grievance Guidance](#)
- IPIECA (global oil and gas industry association for advancing environmental and social performance): [Grievance Guidance](#)
- Communicating the insight from worker hotlines, e.g., [Amader Kotha Worker Helpline](#), [UK Modern Slavery Helpline](#)
- [UN Global Compact webinars](#)

5 Next steps

This toolkit aims to foster alignment and scale action to improve human rights policy and practice within the GAA membership and agribusiness sector. It represents an important first step in building awareness, understanding and capacity on the human rights agenda. Moving forwards, the focus will be peer-learning and bespoke training for members and their suppliers to support them on their human rights journeys.



Further resources

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DISCLAIMER

This report has been developed in the name of WBCSD. Like other WBCSD publications, it is the result of a collaborative effort by members of the secretariat and senior executives from member companies. A wide range of members reviewed drafts, thereby ensuring that the document broadly represents the perspective of the WBCSD membership. Input and feedback from stakeholders listed above was incorporated in a balanced way. This does not mean, however, that every member company or stakeholder agrees with every word.

ABOUT GAA

The Global Agribusiness Alliance (GAA) is an international, CEO-led, private sector platform of supply-side companies, committed to harnessing their collective strengths to tackle shared environmental, social and sustainability challenges. Members span the globe: we are growers and producers, traders, fertilizer and agro-chemicals manufacturers, seed suppliers, primary processors and agritech suppliers from both food and non-food crops. Whilst many of us contribute to wider value chain initiatives with customers, trade association and NGO partners, to date, there has not been a platform to harness combined strengths at the sector and global level. As the food and land-use systems transformation agenda take center stage it is critical for the supply-side to scale its contribution to developing and delivering sustainable solutions.

ABOUT WBCSD

WBCSD is a global, CEO-led organization of over 200 leading businesses working together to accelerate the transition to a sustainable world. We help make our member companies more successful and sustainable by focusing on the maximum positive impact for shareholders, the environment and societies.

Our member companies come from all business sectors and all major economies, representing a combined revenue of more than USD \$8.5 trillion and 19 million employees. Our global network of almost 70 national business councils gives our members unparalleled reach across the globe. Since 1995, WBCSD has been uniquely positioned to work with member companies along and across value chains to deliver impactful business solutions to the most challenging sustainability issues.

Together, we are the leading voice of business for sustainability: united by our vision of a world where more than 9 billion people are all living well and within the boundaries of our planet, by 2050.

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