



[2016-  
2017]

## FAIR LABOR ASSOCIATION INDEPENDENT EXTERNAL MONITORING AGRICULTURAL REPORT

**Company:** Syngenta

**Country:** Argentina

**Crop:** Sunflower

**Production Process:** Roguing

**Assessment Location:** Tunuyan City, Mendoza Province

**Monitor:** Cristina Lopez/Francisco Chicas

**Assessment Dates:** 23-24 January 2017

**Number of assessed farms:** 1

**Total area covered:** 98.8 acres

**Total number of workers:** 18

**Number of workers interviewed:** 18

To view more about the FLA's work with Syngenta, please visit the FLA website [here](#).  
To access the FLA Agriculture Monitoring Benchmarks, please visit [this page](#).

## Employment Relationship

### Compliance Status

Section	Benchmark	Compliance status	Farms
Human Resource Management System	ER.1.1	In compliance	
	ER.1.2 (PR)	In compliance	
	ER.1.3 (PR)	In Progress	
	ER.2.1	In compliance	
	ER.2.1.1	In compliance	
Recruitment and Hiring	ER.3.1	In compliance	
	ER.3.1.1	In compliance	
	ER.3.1.2	In compliance	
	ER.4	In compliance	
	ER.5.1	In compliance	
	ER.5.2	In compliance	
	ER.5.3	In compliance	
	ER.6 (PR)	In compliance	
	ER.7.1	In compliance	
	ER.7.2	In compliance	
	ER.7.3	In compliance	
	ER.7.4	In compliance	
	ER.7.5	In compliance	
	ER.7.6	In compliance	
	ER.7.7	In compliance	
	ER.7.8	In compliance	
	ER.8.1	In compliance	
ER.8.2	In compliance		
ER.8.3	In compliance		
Terms and Conditions	ER.9.1	Noncompliance	
	ER.9.2	In compliance	
	ER.9.2.1	In compliance	
	ER.9.2.2	In compliance	
	ER.9.2.3	In compliance	
	ER.9.3	In compliance	
	ER.9.3.1	In compliance	
	ER.9.3.2	In compliance	
	ER.9.3.3	In compliance	
	ER.10	In compliance	
	ER.11	In compliance	
	ER.12.1	In compliance	
	ER.12.1.1	In compliance	
	ER.12.2	Noncompliance	
	ER.13.1	In compliance	
ER.13.2	In compliance		
ER.13.3	In compliance		
ER.13.4 (PR)	In compliance		

Administration	ER.14.1	In compliance	
	ER.14.2	In compliance	
	ER.15.1	In compliance	
	ER.15.2	In compliance	
	ER.15.2.1	In compliance	
	ER.16.1	In compliance	
	ER.16.2	In compliance	
	ER.17.1	In compliance	
	ER.17.2	In compliance	
	ER.17.3	In compliance	
ER.17.4	In compliance		
Worker Involvement	ER.18.1	In compliance	
	ER.18.2	In compliance	
	ER.18.3 (PR)	In Progress	
Right to Organize and Bargain	ER.19	In compliance	
Work Rules and Discipline	ER.20.1	In compliance	
	ER.20.2	In compliance	
	ER.20.3	In compliance	
	ER.20.4	In compliance	
	ER.20.5 (PR)	In compliance	
	ER.20.6	Noncompliance	
	ER.20.7	In compliance	
	ER.20.8	In compliance	
	ER.20.9	In compliance	
	ER.20.10 (PR)	In compliance	
	ER.20.11	In compliance	
Training	ER.21	N/A	
	ER.22.1 (PR)	In compliance	
	ER.22.1.1 (PR)	In compliance	
	ER.22.2 (PR)	In compliance	
	ER.23.1 (PR)	In compliance	
	ER.23.2 (PR)	In compliance	
HSE Management System	ER.24.1.	In compliance	
	ER.24.2	In compliance	
	ER.24.3	In compliance	
	ER.24.4	In compliance	
	ER.24.4.1	In compliance	
	ER.24.4.2	In compliance	
	ER.24.4.3	In compliance	
	ER.24.4.4	In compliance	
	ER.24.4.5	In compliance	
	ER.24.4.6	In compliance	
ER.24.5 (PR)	In compliance		
Grievance Procedures	ER.25.1	In compliance	
	ER.25.2	In compliance	
	ER.25.3	In compliance	
	ER.25.4	In compliance	

## Employment Relationship Assessment Summary

Terms and Conditions	
<p><b>Benchmarks:</b></p> <p><b>ER.9.1:</b> Workers should be made aware of the employment terms under which they are engaged.</p> <p><b>ER.12.2:</b> Where a union exists on the farm, employers shall make available a copy of the collective bargaining agreement to all workers and other interested parties.</p>	
<b>Noncompliance</b>	
<b>Findings/Noncompliance Explanation:</b>	<p>1. Syngenta is directly hiring workers who are involved in peak production activity. Syngenta and the workers signed the legally required employment contracts (known as "Alta temprana"); however, a copy is not provided to the workers immediately after signature, as required by law. The "Altas" are kept by the group leader and given to workers after the production cycle ends. Despite this situation, workers are verbally informed of the working conditions before the production cycle starts.</p> <p>2. Syngenta does not provide workers with a copy of the CBA. Additionally, information provided to the workers on freedom of association is insufficient, as they do not know the implications of union affiliation, why the union fee is deducted, and the advantages of being affiliated with the union.</p> <p><u>Source:</u> Interviews with workers, group leader and company staff; Records review</p>
<b>Company Action Plan:</b>	<ol style="list-style-type: none"> <li>Syngenta will provide a copy to workers immediately after signature of Employment contracts annex (Alta Temprana), before they leave Santiago del Estero province, and receive a signature of the reception. The CBA (individual contract) was provided the first time, when the employee was hired.</li> <li>Syngenta will perform training in Santiago del Estero and create a banner to put in all field camps to explain the implications of union affiliation.</li> </ol>
<b>Deadline Date:</b>	<ol style="list-style-type: none"> <li>December 2017</li> <li>December 2017</li> </ol>
Work Rules and Discipline	
<p><b>Benchmarks:</b></p> <p><b>ER.20.6:</b> Disciplinary rules and practices shall be clearly communicated to all workers.</p>	
<b>Noncompliance</b>	
<b>Findings/Noncompliance Explanation:</b>	<p>Workers are not informed of the disciplinary system (disciplinary procedures and types of sanctions) implemented at farm level.</p> <p><u>Source:</u> Interviews with workers and company representatives; Records review</p>
<b>Company Action Plan:</b>	<ol style="list-style-type: none"> <li>Syngenta Compliance and HR Team will work on a disciplinary procedure that will specify types of sanctions with the SYT CoC.</li> <li>The procedure will be communicated to all Temporary Rural Workers in Santiago del Estero Province, before traveling to the different growing areas.</li> </ol>
<b>Deadline Date:</b>	<ol style="list-style-type: none"> <li>October 2017</li> <li>December 2017</li> </ol>

## Nondiscrimination

### Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	ND. 1	Risk of Noncompliance	
Recruitment and Employment Practices	ND.2.1	Risk of Noncompliance	
	ND.2.2	Risk of Noncompliance	
	ND.2.3	In compliance	
Compensation Discrimination	ND. 3	In compliance	
Discrimination in Training and Communication	ND. 4	In compliance	
Marital or Pregnancy-Related Discrimination	ND.5.1	In compliance	
	ND.5.2	In compliance	
	ND.5.3	In compliance	
	ND.6.1	In compliance	
	ND.6.1.1	In compliance	
	ND.6.2 (PR)	In compliance	
Health-Related Discrimination	ND. 7	In compliance	
	ND.8	In compliance	
	ND. 9	In compliance	
	ND.10.	In compliance	
Respect of Culture and Religion	ND.11	In compliance	

### Nondiscrimination Assessment Summary

General Compliance / Recruitment and Employment Practices	
<p><b>Benchmarks:</b></p> <p><b>ND.1:</b> Employers shall comply with all national laws, regulations and procedures concerning nondiscrimination.</p> <p><b>ND.2.1:</b> Recruitment and employment practices shall be free from any type of discrimination.</p> <p><b>ND.2.2:</b> Employment policies and practices, including job advertisements, job descriptions, and job performance/evaluation policies and practices shall be free from any type of discriminatory bias.</p>	<p><b>Risk of Noncompliance</b></p>
<p><b>Findings/Noncompliance Explanation:</b></p>	<p>No female workers are hired for the 2016-2017 production cycle. Group leaders and staff in charge of preparing food and for maintenance tasks at the camp are all men. According to Syngenta representatives, this issue is due to cultural practices in the region where they hire workers. Also, based on legal requirements, the company should continue hiring the same workers hired in previous production cycles. Historically, only male workers have attended work on the farms, and since no new job positions have been created, the chances for including females are limited.</p> <p>The recruitment and hiring practices could not be further assessed during this IEM visit, since the process is conducted in a different province, away from the province where the assessed farm is located.</p> <p>With the purpose of assessing the feasibility of hiring female workers, Syngenta conducted a study that involved a survey with women in the region where workers are hired. From this study, Syngenta learned that most women are not interested in</p>

	<p>joining the groups of workers who travel to the farms/camps in every yearly production cycle. However, there is a small number of women that would be willing to do so. Based on the results of this study, Syngenta will assess the implications of incorporating female production workers in future production activity.</p> <p><u>Source:</u> Interviews with group leaders, workers and Syngenta staff; Visual inspection at camp and farm</p>
<b>Company Action Plan:</b>	Syngenta is developing a plan to be implemented in the following years to foment female work in field activities. Next, Campaign Syngenta will begin with an internal programme, where women will be hired in SDE and near growing areas to develop tasks in field activities.
<b>Deadline Date:</b>	December 2017 (plan launch)

## Child Labor

### Assessment Summary

Section	Benchmark	Compliance status	Farms
General Compliance	CL.1	In compliance	
Minimum Age	CL.2	In compliance	
Immediate family members	CL.3	In compliance	
Right to education	CL.4.1 (PR)	In compliance	
	CL.4.2 (PR)	In compliance	
Young Workers	CL.5	In compliance	
	CL.6.1	In compliance	
	CL.6.2	In compliance	
	CL.7	In compliance	
Apprenticeships and Vocational Training	CL.8.1	In compliance	
	CL.8.2	In compliance	
Children on Premises	CL.9	In compliance	
Removal and Rehabilitation of Child Laborers	CL.10.1	Risk of Noncompliance	
	CL.10.2 (PR)	Not Initiated	

### Child Labor Assessment Summary

Removal and Rehabilitation of Child Laborers	
<p><b>Benchmarks:</b></p> <p><b>CL.10.1:</b> If a child laborer is found working on a farm, all relevant downstream suppliers, including the participating company, shall immediately assess the situation at the child's household level and shall engage with relevant stakeholders to find a sustainable remediation solution that is in the best interest of the child.</p>	<b>Risk of Noncompliance</b>
<b>Findings/Noncompliance Explanation:</b>	Syngenta does not have a well-defined procedure to follow in case child laborers are found at a farm. Even if child labor risk is low on Syngenta producing farms, the

	company needs to have a procedure in place, since child labor remains a systemic issue in the agriculture sector in this region.  <u>Source:</u> Interviews with company staff; Document review
<b>Company Action Plan:</b>	A specific contingency plan about Child Labor in field activities will be developed with HR and Compliance Team. Also, we will assess the situation of the farms where the workforce is not directly hired by Syngenta and include it in our contingency plan.
<b>Deadline Date:</b>	December 2017

## Health, Safety and Environment

### Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	HSE.1.	Noncompliance	
Document maintenance, Permits and Certificates	HSE.2	In compliance	
	HSE.3.1	In compliance	
	HSE.3.2	In compliance	
	HSE.4	In compliance	
Evacuation Requirements and Procedure	HSE.5.1	In compliance	
	HSE.5.2	Noncompliance	
Safety Equipment and First Aid	HSE.6.1	In compliance	
	HSE.6.2	Noncompliance	
	HSE.16.3	In compliance	
Personal Protective Equipment	HSE.7	In compliance	
	HSE.8	In compliance	
Chemical Management	HSE.9.1	In compliance	
	HSE.9.2	Noncompliance	
	HSE.9.2.1	In compliance	
	HSE.10	In compliance	
	HSE.11.1	In compliance	
Protection Reproductive Health	HSE.11.2	In compliance	
	HSE.12.1	In compliance	
Infrastructure	HSE.12.2	In compliance	
	HSE.13	Noncompliance	
	HSE.17.1	In compliance	
	HSE.17.2	In compliance	
	HSE.18	In compliance	
	HSE.19	In compliance	
	HSE.20	In compliance	
HSE.21	In compliance		
Machinery Safety	HSE.22	In compliance	
	HSE.14.1	In compliance	
	HSE.14.2	In compliance	
	HSE.14.3	In compliance	

	HSE.14.4	In compliance	
Ergonomics and Medical Facilities	HSE.15.1(PR)	Not Initiated	
	HSE.15.2	Risk of Noncompliance	
	HSE.16.1	In compliance	
	HSE.16.2	In compliance	

### HSE Assessment Summary

Evacuation Requirements and Procedure			
<b>Benchmarks:</b> <i>HSE.1: Employers shall comply with all national laws, regulations and procedures concerning health, safety, and the environment.</i> <i>HSE.5.2: Where appropriate, workers shall be trained in evacuation procedures at least once per year.</i>			<b>Noncompliance</b>
<b>Findings/Noncompliance Explanation:</b>	Evacuation drill was not conducted at the farm/camp for this production cycle. <u>Source:</u> Interviews with workers and company representatives; Records review; Visual inspection		
<b>Company Action Plan:</b>	Evacuation drills will be performed at the farm at the beginning of the production cycle.		
<b>Deadline Date:</b>	December 2017		
Safety Equipment and First Aid			
<b>Benchmarks:</b> <i>HSE.6.2: A sufficient number of workers shall be trained in first aid and fire safety.</i>			<b>Noncompliance</b>
<b>Findings/Noncompliance Explanation:</b>	1. Workers have not received training on first aid. Also, for this production cycle, workers have not received another training on the use of fire extinguishers. The last training took place more than one year ago.  2. The kitchen is equipped with an ABC type fire extinguisher. However, it is not the most adequate for the fire risk in this work area. Syngenta should have a fire extinguisher type K in the kitchen.  <u>Source:</u> Interviews with workers, physical inspection and records review		
<b>Company Action Plan:</b>	1. Syngenta will review and implement the training matrix priorities during the campaign. Perform a HSE & FLP training the first day that rural workers arrive at each growing area. The training will cover first aid and fire safety. 2. Syngenta will analyze with a Specialist if it is necessary to install this kind of extinguisher type K in the kitchen.		
<b>Deadline Date:</b>	1. December 2017 2. September 2017		
Chemical Management			
<b>Benchmarks:</b> <i>HSE.9.2: All chemicals and hazardous substances shall be properly labeled and stored in secure and ventilated areas and disposed of in a safe and legal manner, in accordance with applicable laws. Where relevant, Material Safety Data Sheets (MSDS) must be available as well.</i>			<b>Noncompliance</b>
<b>Findings/Noncompliance</b>	Chemicals used by cleaning worker are not isolated in a designated area; these chemicals were seen in the kitchen and bathroom, without segregation. Also, there		



<b>Explanation:</b>	are no signs indicating the risks of chemical exposure. <u>Source:</u> Visual inspection
<b>Company Action Plan:</b>	Syngenta will review and rearrange the camp's infrastructure to assign a specific area for Chemicals used by cleaning worker.
<b>Deadline Date:</b>	November 2017

### Infrastructure

**Benchmarks:**

*HSE.13: For indoor workplaces, all necessary ventilation, plumbing, electrical, noise and lighting services shall be installed and maintained to conform to applicable laws and to prevent or minimize hazardous conditions to workers in the facility.*

**Noncompliance**

**Findings/Noncompliance Explanation:**

Syngenta has not conducted the legally required annual lighting assessment (Resolution SRT 84/2012) in the kitchen, which is the only indoor work area in the camp.

Source: Visual inspection at farm/camp; interviews with workers and company staff; Review of health and safety records

**Company Action Plan:**

Syngenta will conduct a lighting assessment in the kitchen of camps.

**Deadline Date:**

December 2017

### Ergonomics

**Benchmarks:**

*HSE.15.2: Employers shall train workers in proper lifting techniques, and items such as lifting belts shall be provided.*

**Risk of Noncompliance**

**Findings/Noncompliance Explanation:**

Workers have not been trained on proper lifting techniques, and Syngenta has not assessed whether any worker needs to use a lifting belt.

Source: Interviews with workers and company staff

**Company Action Plan:**

Ergonomic risk assessment for the different types of fieldwork will be performed.

**Deadline Date:**

December 2017

## Hours of Work

### Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	HOW.1.1	Noncompliance	
	HOW.1.2	In compliance	
	HOW.1.3	In compliance	
	HOW.1.4	In compliance	
	HOW.17.1	In compliance	
	HOW.17.2	In compliance	

Rest Day	HOW.2	Noncompliance	
Meal and Rest Breaks	HOW.3	In compliance	
Protected Workers	HOW.4.1	In compliance	
	HOW.4.2	In compliance	
	HOW.4.3	In compliance	
Overtime	HOW.5.1	In compliance	
	HOW.5.2	In compliance	
	HOW.6.1	In compliance	
	HOW.6.2	In compliance	
	HOW.6.3	In compliance	
Public Holidays and Leave	HOW.7	In compliance	
	HOW.8.1	In compliance	
	HOW.8.2	In compliance	
	HOW.8.3	In compliance	
	HOW.9	In compliance	
	HOW.10.1	In compliance	
	HOW.10.2 (PR)	In compliance	
	HOW.11	In compliance	
	HOW.12.1	In compliance	
	HOW.12.2	In compliance	
HOW.13	In compliance		
HOW.14	In compliance		
HOW.15	In compliance		
HOW.16	In compliance		

### Hours of Work Assessment Summary

General Compliance / Rest Day	
<p><b>Benchmarks:</b></p> <p><b>HOW.1.1:</b> Employers shall comply with all national laws, regulations and procedures concerning hours of work, public holidays and leave.</p> <p><b>HOW.2:</b> Pursuant to any permanent or temporary contract, workers shall be entitled to at least 24 consecutive hours of rest in every seven-day period. If workers must work on a rest day, alternative consecutive 24 hours must be provided within that same seven-day period or immediately following. For short-term seasonal work during peak activities (2-3 weeks), workers have the option to work more than seven days without a day off if they voluntarily agree with it, unless local law prohibits it. When the peak activity period exceeds 3 weeks, and the employer has control over the workers' schedule, the rest day provision must apply.</p>	<b>Noncompliance</b>
<p><b>Findings/Noncompliance Explanation:</b></p> <p>There is one hired cook at the farm, who works seven days in a week consecutively, without a rest day. Even when such schedule has been voluntarily agreed, he's been working at the farm for around five weeks; hence, he could not be considered a short-term seasonal worker.</p> <p><u>Source:</u> Interviews with workers and company staff; Records review</p>	
<p><b>Company Action Plan:</b></p> <p>Review and assurance with HR and Line Managers the actual HoW and its implications for compliance with local legislation. There is a procedure developed to regulate HoW and rest days for cooks. Workers will be trained on this requirement and a tracking system will be implemented.</p>	
<p><b>Deadline Date:</b></p> <p>October 2017</p>	

## Compensation

### Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	C.1.1	In compliance	
	C.1.2	In compliance	
	C.1.3	In compliance	
	C.1.4	In compliance	
Minimum Wage/Fair Compensation	C.2.1	In compliance	
	C.2.2	In compliance	
	C.2.3	In compliance	
	C.2.4 (PR)	Not to be answered by monitors. The FLA is working on analysis the situation based on real wage data collected during IEMs.	
	C.2.5 (PR)	Not Initiated	
	C.2.6 (PR)	Not Initiated	
	C.3	In compliance	
Farmer/Producer Income	C.5	In compliance	
	C.4	In compliance	
Wage Payment and Calculation	C.6	In compliance	
	C.7.1	In compliance	
	C.7.2	In compliance	
	C.7.3	In compliance	
	C.7.4	In compliance	
	C.7.5	In compliance	
	C.8.1	In compliance	
	C.8.2	In compliance	
	C.8.3	In compliance	
	C.8.4	In compliance	
	C.9	In compliance	
	C.10.1	In compliance	
	C.10.1.1	In compliance	
	C.10.2	In compliance	
C.10.3	In compliance		
Workers Awareness	C.11.1.1	Noncompliance	
	C.11.1.2	In compliance	
	C.11.1.3	In compliance	
	C.11.1.4	In compliance	
	C.11.1.5	In compliance	
	C.13	In compliance	
Fringe Benefits	C.12.1	In compliance	
	C.12.2	In compliance	
	C.12.3	In compliance	
	C.12.4	In compliance	
	C.12.5	In compliance	

## Compensation Assessment Summary

Workers Awareness	
<b>Benchmarks:</b> <b>C.11.1.1:</b> Employers shall make every reasonable effort to ensure workers understand their compensation, including: the calculation of wages	
<b>Noncompliance</b>	
<b>Findings/Noncompliance Explanation:</b>	<p>Despite Syngenta providing communication and training on compensation, workers are not clear about the compensation package, including the wage structure and salary deductions.</p> <p><u>Source:</u> Interviews with workers and company representatives</p>
<b>Company Action Plan:</b>	Perform Training in Santiago del Estero and create a banner to put in all field camps to explain compensation package, including the wage structure and salary deductions. The training will include a review to make sure workers understand it.
<b>Deadline Date:</b>	December 2017

### Overview - Farms vs. Non-compliances

**Total number of Farms: 1**

	Employment Relationship	Non-discrimination	Harassment or Abuse	Forced Labor	Child Labor	Freedom of Association and Collective Bargaining	Health, Safety and Environment	Hours of Work	Compensation	Total
<b># of non-compliances or risk of non-compliances</b>	3	3	0	0	1	0	6	2	1	16
	3	3	0	0	1	0	6	2	1	16