



[2019]

FAIR LABOR ASSOCIATION INDEPENDENT EXTERNAL MONITORING AGRICULTURAL REPORT

Company: Balsu

Country: Turkey

Crop: Hazelnut

Production Process: Harvesting

Assessment Location: Düzce, Gümüşova

Monitor: Cigdem Oguz and Khaled Al Chalet

Assessment Dates: 26 & 27 & 28 & 29 August 2019

Number of assessed farms: 12

Total area covered: 417

Number of farmers interviewed: 4

Total number of workers: 135

Number of workers interviewed: 53

To view more about the FLA's work with Balsu, 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.2.1 (PR)	In compliance	
	ER.2.1.1 (PR)	In compliance	
Recruitment and Hiring	ER.3.1	In compliance	
	ER.3.1.1	In compliance	
	ER.3.1.2	Risk of noncompliance	All farms
	ER.4	Risk of noncompliance	Farm 11, 12
	ER.5.1	Noncompliance	Farm 11, 12
	ER.5.2	Noncompliance	Farm 11, 12
	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	Noncompliance	All farms
	ER.7.7	In compliance	
ER.7.8	In compliance		
Terms and Conditions	ER.9.1	Noncompliance	Farm 11, 12
	ER.9.2	0	
	ER.9.2.1	Risk of noncompliance	All farms
	ER.9.2.2	N/A	
	ER.9.2.3	N/A	
	ER.9.3	0	
	ER.9.3.1	In compliance	
	ER.9.3.2	In compliance	
	ER.9.3.3	In compliance	
	ER.10	N/A	
	ER.11	Noncompliance	All farms
	ER.12.1	In compliance	
	ER.12.1.1	Risk of noncompliance	All farms
	ER.12.2	N/A	
	ER.13.1	In compliance	
ER.13.2 (PR)	In progress	All farms	
ER.13.3 (PR)	In compliance		
Administration	ER.15.1	In compliance	
	ER.15.2	In compliance	
	ER.15.2.1	Risk of noncompliance	All farms
	ER.16.1	In compliance	
	ER.16.2	In compliance	
	ER.17.2 (PR)	In compliance	
	ER.17.3 (PR)	In compliance	
ER.17.4 (PR)	In compliance		
Worker Involvement	ER.18.1	In compliance	
	ER.18.2 (PR)	In progress	All Farms
Right to Organize and Bargain	ER.19	N/A	
Work Rules and Discipline	ER.20.1	In compliance	
	ER.20.2	In compliance	
	ER.20.3 (PR)	In compliance	
	ER.20.4	In compliance	
	ER.20.6	In compliance	
	ER.20.7	In compliance	

	ER.20.8	In compliance	
	ER.20.9 (PR)	In compliance	
	ER.20.11	Risk of noncompliance	All Farms
Access to Training for Family Members	ER.21	Risk of noncompliance	All Farms
HSE Management System	ER.24.1.	In compliance	
	ER.24.2 (PR)	In compliance	
	ER.24.3	In compliance	
	ER.24.4 (PR)	In compliance	
	ER.24.4.1 (PR)	In compliance	
	ER.24.4.2 (PR)	In compliance	
	ER.24.4.3 (PR)	In compliance	
	ER.24.4.4 (PR)	In compliance	
	ER.24.4.5 (PR)	In compliance	
	ER.24.4.6 (PR)	In compliance	
Grievance Procedures	ER.25.1 (PR)	In compliance	
	ER.25.2 (PR)	In compliance	
	ER.25.3	In compliance	
	ER.25.4	In compliance	

Employment Relationship Assessment Summary

Notable Feature

All workers received trainings regarding employment relationships. The Balsu hotline for grievance is working. In Ballikaya the auditors did not see labor contractors cutting money from workers. There are supervisors only. Farmers and supervisors have a friendly relationship. One farmer pays the wages one by one to each worker - not leaving this to the supervisor. Farmers said that they contribute the return trip of the workers by collecting money among each other.

Balsu supports women farmers in rural with the Strong Women Strong Agriculture Project which implemented in Sakarya after taking place in Duzce in 2018. The project was granted the technical support grant of East Marmara Development Agency and took place in cooperation with Hendek

District Governorate, Hendek District Directorate of Agriculture and Balsu.

This project aims to reach women farmers in Balsu's hazelnut supply chain based in Hendek, Sakarya to empower, build capacity and support the visualization of their active and thriving participation to agricultural production for the benefit of other actors in the production process.

Women will receive trainings on Good Agricultural Practices, Quality and Productivity, Occupational health and safety, Ecology and Environment, Good Social Practices, Woman Empowerment with target to become more influential in regards to social, economic and environmental issues in their community.

Proof of Age Documentation

Benchmarks:

ER.5.1: No worker hired by an employment agency or a labour contractor shall be compensated below the legal minimum wage. The same rights as provided for directly hired contract workers apply for workers hired via an employment agency or labor intermediary.

ER.5.2: Fees associated with the employment of workers shall be the sole responsibility of employers. No worker hired via an employment agency or a labour contractor shall pay a fee or get a reduction by applying a fee over his salary.

ER.7.6: contract, temporary, casual, daily, seasonal or migrant workers receive at least the minimum wage or the prevailing industry wage whichever is higher, and all legally mandated benefits such as social security, other forms of insurance, annual leave and holiday pay;

**Noncompliance
in three farms**

In all farms

<p>ER.3.1.2: In those cases where proof of age documentation is not readily available or unreliable, employers shall take all necessary precautions which can reasonably be expected of them to ensure that all workers are at least the minimum legal working age, including requesting and maintaining medical or religious records of workers, or through other means considered reliable in the local context.</p> <p>ER.4: Employers shall not use employment agencies/labour contractors that rely on any practice that is linked to: using false information to recruit workers; restricting workers' freedom of movement; requiring workers to pay recruitment and/or employment fees; withholding from workers a copy of their employment contract in their native language that sets forth the general terms and conditions of engagement and employment; retaining possession or control of workers identification and other documents like passports, identity papers, work permits, and other personal legal documents; punishing workers for terminating employment.</p>		<p>Risk of Noncompliance in all farms</p> <p>In three farms</p>
<p>Findings/Noncompliance Explanation:</p>	<p>There were 9 children working in the farms. When asked, farmers say that he tell in advance that the labor contractor should not bring them but they come and then the farmer cannot say much once they arrive. In a farmer's family there are 2 children working with usual work hours. Second noncompliance is that in seasonal migrant work there are no holidays or free days. In Farm No 11 and 12 there is a labor contractor cutting 10 % from workers (77 Liras will be paid instead of 85) and farmers actually pay 95 - 10 Liras more as a daily amount for the electricity and water - which is unusually expensive given the bad conditions in the accommodation.</p> <p><u>Source:</u> Interviews with workers and farmers / visual observation</p>	
<p>Company Action Plan:</p>		
<p>Activity</p>	<p>Developing Social programme content (improved communication with farmers including women farmers, engaging with the key stakeholders, building staff capacity, revision of policy procedures, workers, labor contractor trainings)</p>	
<p>Output indicators (targeted results)</p>	<p>-increased awareness on the importance of collecting and keeping the identification documents of workers by the farmers and other institutions who is responsible (through trainings (farmer, labor contractor, workers, distribution of farmers handbooks, brochures, using SMSs, WhatsApp groups and Balsu social media accounts on this matter.)</p> <p>- Increased number of IMS during the harvest (as per risk analysis updated during march 2020 – June 2020)</p> <p>- highlighting the responsible person / cooperation for the mechanism of identification of employees at each level.</p> <p>- middle man involvement to receive the demographics of the workers per farmer selling to them.</p>	
<p>Timeline and Deadline Date</p>	<p>December 2020</p>	
<p>Input (budget/resources)</p>	<p>Temporary social workers, farmers/manav handbooks / institutional visits / communication channel</p>	
<p>Responsible staff (title/department)</p>	<p>Manager / Coordinator - Compliance Department</p>	

<p>Terms and Conditions</p>		
<p>Benchmarks:</p> <p>ER.9.1: Workers should be made aware of the employment terms under which they are engaged.</p> <p>ER.11: Employers shall ensure that all legally mandated requirements for the protection or management of special categories of workers, including migrant, juvenile, contract/contingent/temporary, casual, daily, home workers, pregnant or disabled workers, are implemented.</p>		<p>Noncompliance in two farms</p> <p>In all farms</p>

<p><i>ER.9.2: Employment terms shall be those to which the worker has voluntarily agreed, provided those terms do not fall below:</i> <i>ER.9.2.1: provisions of national laws;</i> <i>ER.12.1.1: Employers shall inform workers that any form of harassment or abuse in the workplace shall be subject to disciplinary measures.</i></p>		<p>Risk of Noncompliance in all farms</p>
Findings/Noncompliance Explanation:	<p>The employment terms of the migrant workers fall below the provisions of national laws and FLA Code with regard to hours of work. There are no special worker category such as young workers. Harassment or abuse are not among the topics discussed between farmer and supervisor. In Farm 11, 12 (same worker group for two) 4 workers openly said they would not accept the work, if they had known the accommodation conditions in advance.</p> <p><u>Source:</u> Interview with the farmers & workers & supervisors</p>	
Company Action Plan:		
Activity	Developing Social program content (improved communication with farmers including women farmers, engaging with the key stakeholders, building staff capacity, revision of policy procedures, workers, labor contractor trainings)	
Output indicators (targeted results)	<ul style="list-style-type: none"> - More farmer - worker contracts will be drawn and approved by the local employment agency - Local Employment agency will communicate with the farmers and the workers for the necessity of the work contract. 	
Timeline and Deadline Date	October 2020	
Input (budget/resources)	Temporary social workers, farmers/manav handbooks / institutional visits / communication channel	
Responsible staff (title/department)	Manager / Coordinator - Compliance Department	

Administration		
<p>Benchmarks: <i>ER.15.2.1: Advances must be properly documented, and their receipt and accuracy must be confirmed by the recipient worker, in writing whenever possible (e.g. signature, thumbprint).</i></p>		<p>Risk of Noncompliance in all farms</p>
Findings/Noncompliance Explanation:	<p>Advances are in kind and the records are kept by the supervisor. At the end of the harvest, he calculates these all and divides into the number of workers. This constitutes a risk of noncompliance as he can always charge them more.</p> <p><u>Source:</u> Interviews with workers & supervisors</p>	
Company Action Plan:		
Activity	Developing Social program content (improved communication with farmers including women farmers, engaging with the key stakeholders, building staff capacity, revision of policy procedures, workers, labor contractor trainings)	
Output indicators (targeted results)	<p>Increased knowledge of farmers and workers' awareness on the documentation of the advances.</p> <p>A sample form will be handed to the farmers through farmers handbook.</p>	
Timeline and Deadline	October 2020	

Date	
Input (budget/resources)	Temporary social workers, farmers/manav handbooks / institutional visits / communication channel
Responsible staff (title/department)	Manager / Coordinator - Compliance Department

Work Rules and Discipline	
<p>Benchmarks: <i>ER.20.11: The disciplinary system shall include a third party witness during imposition, and an appeal process. In case of smallholder settings, existing appeal mechanism at community level is acceptable.</i></p>	
	Risk of Noncompliance in all farms
Findings/Noncompliance Explanation:	The system lacks an appeal process. <u>Source:</u> Documentation review
Company Action Plan:	
Activity	Dissemination of the Balsu Disciplinary system existing appeal mechanism
Output indicators (targeted results)	In addition to the “sample contract” contents, we will include information on the disciplinary procedure and dissolution existing appeal mechanism. This sample form will be shared with the labor contractors, workers and farmers in 2020 through the workshop sessions. The Balsu disciplinary procedure is shared with all farmers within the program as indicated in the previous topic in the farmers’ handbook.
Timeline and Deadline Date	October 2020
Input (budget/resources)	Temporary social workers, farmers/manav handbooks / institutional visits / communication channel
Responsible staff (title/department)	Manager / Coordinator - Compliance Department

Access to Training for Family Members	
<p>Benchmarks: <i>ER.21: Family members (spouses and adult children) involved directly or indirectly in agriculture production shall have access to all training and awareness raising activities conducted for the workers and growers on the farms.</i></p>	
	Risk of Noncompliance in all farms
Findings/Noncompliance Explanation:	Farmers and workers attend the meetings - worker meetings are given at their accommodation. The farmer families are not present at the meetings for trainings, they do not engage with these activities since they consider this a family work. <u>Source:</u> Interviews with farmers
Company Action Plan:	
Activity	Increase number of women farmers trainings / Balsu field workers will come together with female farmers who were dealing with seasonal agriculture workers and labor contractors.

Output indicators (targeted results)	<p>Balsu worked with farmer women in the Strong Women Strong Agriculture Project developed after baseline activities taken in 2017.</p> <p>Women farmers who received training such as employment relations, child labor also received training on capacity-building training on conflict and solution and discrimination are more likely to be a solution partners.</p> <p>Women will receive trainings on Good Agricultural Practices, Quality and Productivity, Occupational health and safety, Ecology and Environment, Good Social Practices, Woman Empowerment with target to become more influential in regards to social, economic and environmental issues in their community in 2020. 50 more women will be supported in scope of this project in 2020.</p>
Timeline and Deadline Date	December 2020
Input (budget/resources)	Development Agency of Turkey Budget, Hendek Municipality cost sharing / Balsu
Responsible staff (title/department)	Manager / Coordinator - Compliance Department

Non-discrimination

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	ND. 1	Risk of Noncompliance	All Farms
Recruitment and Employment Practices	ND.2.1	In compliance	
	ND.2.3	In compliance	
Compensation Discrimination	ND. 3	Noncompliance	All Farms
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	Risk of Noncompliance	All Farms
	ND.6.1.1	Risk of Noncompliance	All Farms
Health-Related Discrimination	ND. 7	In compliance	
	ND.8	In compliance	
	ND. 9	In compliance	
Respect of Culture and Religion	ND.11	In compliance	

Non-discrimination Assessment Summary

Notable Feature

In four groups assessed as a notable feature the workers started to leave the job at 6.30 PM instead of 7. This eliminates partially the discrimination between local and migrant workers' working hours.

General Compliance		
<p>Benchmarks: <i>ND.1: Employers shall comply with all national laws, regulations and procedures concerning non-discrimination.</i></p>		<p>Risk of Noncompliance in all farms</p>
<p>Findings/Noncompliance Explanation:</p>	<p>There is discrimination in the working hours and wages between local and migrant workers. This is a custom in the region, when asked farmers and locals say that local people are more efficient in hazelnut picking, more careful about the trees, and more eager to work. Locals earn 100-120 Liras while migrants earn 85 daily.</p> <p><u>Source:</u> Interviews with farmers / locals</p>	
<p>Company Action Plan</p>		
<p>Activity</p>	<p>Developing Social programme content (improved communication with farmers including women farmers, engaging with the key stakeholders, building staff capacity, revision of policy procedures, workers, labor contractor trainings)</p>	
<p>Output indicators (targeted results)</p>	<ul style="list-style-type: none"> - Farmers awareness on the discrimination on working hours will be increased through specific attention in the social trainings. - This issue will also be expressed in the meetings held with the local authorities and the public institution support will be taken to prevent discrimination on this issue. - We will advise the local commission decision for emphasising difference in working hours. -Farmers handbook will have a record column for the working hours. 	
<p>Timeline and Deadline Date</p>	<p>August 2020</p>	
<p>Input (budget/resources)</p>	<p>Temporary social workers, farmers/manav handbooks / institutional visits / communication channel</p>	
<p>Responsible staff (title/department)</p>	<p>Manager / Coordinator - Compliance Department</p>	

Compensation Discrimination		
<p>Benchmarks: <i>ND.3: There shall be no differences in compensation for workers performing equal work or work of equal value based on gender, race, religion, age, disability, sexual orientation, nationality, political opinion, social group, ethnic origin, employment status (e.g. local workers vs. migrant workers), or membership in unions or other workers' representative bodies.</i></p>		<p>Noncompliance in one farm</p>
<p>Findings/Noncompliance Explanation:</p>	<p>In the region, it is a common practice that local worker is paid more than the migrant ones. Although, the FLA team could not detect more details in the assessed farms due to the context, many people agree that this practice is fair since the locals know hazelnut harvesting better.</p> <p><u>Source:</u> Observations & Interviews with the locals</p>	
<p>Company Action Plan</p>		
<p>Activity</p>	<p>Developing Social programme content (improved communication with farmers including women farmers, engaging with the key stakeholders, building staff capacity, revision of policy procedures, workers, labor contractor trainings)</p>	

Output indicators (targeted results)	<ul style="list-style-type: none"> - Farmers awareness on the discrimination on payments will be increased through specific attention in the social trainings. - This issue will also be expressed in the meetings held with the local authorities and the public institution support will be taken to prevent discrimination on this issue. - We will advise the local commission decision for emphasising fair payments .
Timeline and Deadline Date	August 2020
Input (budget/resources)	Temporary social workers, farmers/manav handbooks / institutional visits / communication channel
Responsible staff (title/department)	Manager / Coordinator - Compliance Department

Marital or Pregnancy-Related Discrimination	
<p>Benchmarks:</p> <p><i>ND.6.1: Employers shall abide by all protective provisions in national laws and regulations benefitting pregnant workers and new mothers, including provisions concerning maternity leave and other benefits; prohibitions regarding night work, temporary reassignments away from work stations and work environments that may pose a risk to the health of pregnant women and their unborn children or new mothers and their new born children, temporary adjustment of working hours during and after pregnancy, and the provision of breast-feeding breaks and facilities.</i></p> <p><i>ND.6.1.1: Where such legal protective provisions are lacking, employers shall take reasonable measures to ensure the safety and health of pregnant women and their unborn children.</i></p>	Risk of Noncompliance in two farms
Findings/Noncompliance Explanation:	There is no such rearrangement of hours of work for pregnancy.
Company Action Plan	
Activity	Developing Social programme content (improved communication with farmers including women farmers, engaging with the key stakeholders, building staff capacity, revision of policy procedures, workers, labor contractor trainings)
Output indicators (targeted results)	<ul style="list-style-type: none"> - Farmers awareness on the workers in special conditions will be increased through specific attention in the social trainings. - Balsu's training module both for the farmers and workers will includes topics such as working conditions, wages, working hours, and special arrangements for young and pregnant workers.
Timeline and Deadline Date	August 2020
Input (budget/resources)	Temporary social workers, farmers/manav handbooks / institutional visits / communication channel
Responsible staff (title/department)	Manager / Coordinator - Compliance Department

Forced Labor

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	F.1	In compliance	
Freedom in Employment and Movement	F.2	Risk of Noncompliance	All Farms
	F.3	In compliance	
	F.4.1	In compliance	
	F.4.2	In compliance	
	F.5.1	In compliance	
	F.5.2	In compliance	
	F.5.3	In compliance	
	F.7.1	In compliance	
	F.7.2	In compliance	
	F.7.3	In compliance	
	F.7.4	In compliance	
	F.7.5	In compliance	
	F.7.6	In compliance	
	F.7.7	In compliance	
F.8	Risk of Noncompliance	All Farms	
Work of Family Members	F.6.1	In compliance	
	F.6.2	Risk of Noncompliance	
	F.6.3	In compliance	
	F.6.4	In compliance	
Personal Workers Identification and Other Documents	F.9	In compliance	

Forced Labor Assessment Summary

Freedom in Employment and Movement	
Benchmarks: <i>F.2: All workers shall have the right to enter into and to terminate their employment freely.</i> <i>F.8: The imposition of overtime where workers are unable to leave the work premises constitutes forced labor.</i>	Risk of Noncompliance in all farms
Findings/Noncompliance Explanation:	<p>Monitors understood from the interviews that workers have the right to terminate their employment freely from the farmers side. However there is a risk of non-compliance where migrant workers had no choice but to complete the harvest season as they have to wait for the entire group to complete the job as labor contractors organize transportation back home altogether.</p> <p>In addition, migrant workers are working an hour longer than local workers and have no choice to refuse and stop working. This can be considered as forced overtime since working time exceeds the limits of national legislations and the FLA Code.</p> <p><u>Source:</u> Interviews with the workers & Observations</p>

Company Action Plan

Activity	Developing Social programme content (improved communication with farmers including women farmers, engaging with the key stakeholders, building staff capacity, revision of policy procedures, workers, labor contractor trainings)
Output indicators (targeted results)	-Good samples will be disseminated in the farmers trainings and local authority visits. -At some townships, working hours was revised for an hour shorter. This good sample will be shared within the community. - An official request for the working hours adjustment will be shared with the decision-making commission of the township of Gumusova.
Timeline and Deadline Date	October 2020
Input (budget/resources)	Temporary social workers, farmers/manav handbooks / institutional visits / communication channel
Responsible staff (title/department)	Manager / Coordinator - Compliance Department

Child Labor

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	CL.1	Noncompliance	Farm 4, 6, 7, 9, 11, 12
Minimum Age	CL.2	Noncompliance	Farm 4, 6, 7, 8, 9, 11, 12
Immediate Family Members	CL.3	Risk of noncompliance	Farm 7
Right to Education	CL.4.1 (PR)	In compliance	
Young Workers	CL.5	In compliance	
	CL.6.1	Noncompliance	All Farms
	CL.6.2	Noncompliance	All Farms
	CL.7	Noncompliance	All Farms
Apprenticeships and Vocational Training	CL.8.1 (PR)	Not Initiated	All Farms
	CL.8.2 (PR)	Not Initiated	All Farms
Children on Premises	CL.9	Risk of noncompliance	All Farms
Removal and Rehabilitation of Child Laborers	CL.10.1	Risk of noncompliance	Farm 4, 6, 7, 8, 9, 11, 12
	CL.10.2 (PR)	In compliance	

Child Labor Assessment Summary

Notable Feature

Balsu has a Social Compliance Program in 2019 that was shared with the FLA auditors during the audit. Accordingly, child labor removal and rehabilitation has 7 steps, including information gathering, evaluation, planning, service, coordination, re-evaluation, case closing and follow-ups, final evaluation. In other places that Balsu conducted IMS, the social workers took notes about potential children workers in workers' accommodation to watch them closely.

General Compliance	
<p>Benchmarks</p> <p><i>CL.1: Employers shall comply with all national laws, ratified international conventions, fundamental labor rights, regulations and procedures concerning the prohibition of child labor.</i></p>	
Noncompliance in six farms	
Findings/Noncompliance Explanation:	<p>There were 12-13 years old children working in these farms. Also, in other farms when asked many young workers say that they are 15 or 16, since we are not able to see their IDS we had to believe them but they looked younger than that.</p> <p><u>Source:</u> Observation & Interviews</p>
Company Action Plan	
Activity	Developing Social programme content (improved communication with farmers including women farmers, engaging with the key stakeholders, building staff capacity, revision of policy procedures, workers, labor contractor trainings)
Output indicators (targeted results)	<p>Cooperation with local government has a significant impact on the solution of all problems in child labor and seasonal agriculture.</p> <p>In this context, in each district meetings will be held when the harvesting period of 2020 began on child labor. The meeting host will be Balsu on the other hand, Universities and all the relevant local authorities will be invited.</p> <p>-All Balsu communication channels will be used</p> <p>- Prior to harvest risk analysis on the child labor status in procurement region will be updated</p>
Timeline and Deadline Date	October 2020
Input (budget/resources)	Temporary social workers, farmers/manav handbooks / institutional visits / communication channel
Responsible staff (title/department)	Manager / Coordinator - Compliance Department

Minimum Age	
<p>Benchmarks</p> <p><i>CL.2: Employers shall comply with ILO Convention 138 and shall not employ anyone under the age of 15 or under the age for completion of compulsory education, whichever is higher. If a country has a specified minimum age of 14 years due to insufficiently developed economy and educational facilities, employers might follow national legislations but must work to progressively raise the minimum age to 15 years.</i></p>	
Noncompliance in seven farms	
Findings/Noncompliance Explanation:	<p>7 children, 6 boys 1 girl were detected during visit. 1 boy and 1 girl were family worker in Farm 7 and they are 12-13 years old. They are allowed to work in family business but they work the same hours like an adult.</p> <p><u>Source:</u> Interviews, Observations</p>
Company Action Plan	
Activity	Developing Social programme content (improved communication with farmers including women farmers, engaging with the key stakeholders, building staff capacity, revision of policy procedures, workers, labor contractor trainings)
Output indicators (targeted results)	Steps Balsu will take in order to tackle child labor problems in the supply chain in 2020

	<p>1. Summer Schools (number and content TBC) 2. Worker Trainings and Labor Intermediary Trainings (including Origin) 4. Farmer trainings and Training for Women in Local Communities 5. Grievance mechanism 5. Government and other local stakeholders to scale up efforts across the country</p> <ul style="list-style-type: none"> • identification and monitoring of child labour is key IMS during the harvest will be increased thus 4 temporarily social workers will be hired. • In order to provide access to public services needed by children and their families local authorities will be visited and mapped prior workers arrival. • We will organize activities to promote social awareness and sensitivity at all the programme villages <p>Sace fills an essential gap for child labor-related efforts: Currently, there is no other alternative in the villages that guarantee access to a large number of children to a safe environment and provide them basic needs while their family members work in the gardens.</p> <p>Safe Spaces Staff: “For example, we see that former students remember last years’ learnings and wash their hands when they get to school. New students learn from their example too.’</p> <p>A Child: ‘I would definitely be working in the garden if it was not for the school’ M. is 13 years old; he travelled to Beyören from Mardin-Dargecit with his mother, younger sister, elder brothers and cousins for 2018 harvest. The family have been making the journey to the region for the last couple of years for work. Last year, M. started to work with his family in the gardens too but one day his path crossed with GHF team visiting their house. His mother and eldest brother decided to send him to school when they heard that he would get a scholarship.</p> <p>M. loves attending the summer school and he especially enjoys art and crafts workshops in the afternoons. He insisted that he attends the school this year too and his family did not object since he would receive his scholarship. He says that he would have to work in the garden from 7am to 7pm under the heat if it was not for the school and he would do anything in his power to attend the school next year as well.</p> <p>A Young Worker: ‘There were very bad living conditions in places I went to harvest other products, there’s hot water and electric here.’</p> <p>A Public Institutions Officers: ‘Compared the previous year the child labor numbers are decrease thanks to Balsu studies. As a public employee I was not aware of the problem of child labor, now everyone knows what the problem is. They made this problem visible.’</p> <p>A Female Farmer: “Women farmers work with the laborers in the field, so if they get more training, they can do better. We are in this together now.”</p>
Timeline and Deadline Date	October 2020
Input (budget/resources)	Temporary social workers, farmers/manav handbooks / institutional visits / communication channel
Responsible staff (title/department)	Manager / Coordinator - Compliance Department - Top Management (Due to the Covid-19 Pandemic)

Immediate Family Members	
<p>Benchmarks</p> <p>CL.3: In accordance with national laws and ILO Convention 138, children of producers not younger than 12 years may be involved in light work on their parents' farm provided that:</p> <ul style="list-style-type: none"> • The work is not dangerous and not harmful to their health or development; • The work does not prejudice their attendance at school and is done within reasonable time limits after school or during holidays; • The work is appropriate to the child's age and physical condition and does not jeopardize the child's social, moral or physical development; • The child's parents provide supervision and guidance. 	<p>Risk of Noncompliance in one farm</p>
<p>Findings/Noncompliance Explanation:</p>	<p>Children of the family in the assessed farm no 7 work as the same hours as an adult.</p> <p><u>Source:</u> Interview with the farm & observations</p>
<p>Company Action Plan</p>	
<p>Activity</p>	<p>Developing Social programme content (improved communication with farmers including women farmers, engaging with the key stakeholders, building staff capacity, revision of policy procedures, workers, labor contractor trainings)</p>
<p>Output indicators (targeted results)</p>	<p>-farmers and Village Head Man will be aware of the difference child labor in seasonal agriculture work, local work and family member</p> <p>-Local children will be supported with activities (100 children will receive environment training by TEMA in 2020)</p>
<p>Timeline and Deadline Date</p>	<p>December 2020</p>
<p>Input (budget/resources)</p>	<p>Temporary social workers, farmers/manav handbooks / institutional visits / communication channel</p>
<p>Responsible staff (title/department)</p>	<p>Manager / Coordinator - Compliance Department - Top Management (Due to the Covid-19 Pandemic)</p>
Young Workers	
<p>Benchmarks</p> <p>CL.6.1: Employers shall comply with all relevant laws that apply to young workers, (e.g., those between the minimum legal working age and the age of 18) including regulations related to hiring, working conditions, types of work, hours of work, proof of age documentation, and overtime.</p> <p>CL.6.2: Employers shall maintain a list of all young workers, their entry dates, proof of age and description of their assignment.</p> <p>CL.7: No person under the age of 18 shall undertake hazardous work, i.e., work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of persons under the age of 18. Such work includes, but is not limited to, the application of agricultural chemicals, pesticides, and fertilizers, use of farm equipment tools and machinery, lifting or moving of heavy materials or goods, or carrying out hazardous tasks such as underground or underwater or at dangerous heights. Every activity performed by a young worker must be supervised by an adult.</p>	<p>Noncompliance in all farms</p>
<p>Findings/Noncompliance Explanation:</p>	<p>Working on the steep slopes and carrying heavy sacks is considered as hazardous work for young workers. In all farms there are young workers under 18. In total 11 male young, 23 female young could be detected. All were migrant workers. There is no difference between young and adult workers in the farms, they work same hours. No lists were kept for young workers.</p> <p><u>Source:</u> Observations & Interviews with Workers</p>
<p>Company Action Plan</p>	
<p>Activity</p>	<p>Developing Social programme content (improved communication with farmers</p>

	including women farmers, engaging with the key stakeholders, building staff capacity, revision of policy procedures, workers, labor contractor trainings)
Output indicators (targeted results)	-Farmers handbook will be revised -Farmers record keeping will be improved (date, month and the year) -Good samples in regards to the young worker' hours and tasks will be shared -Detailed need assessment of Young body for OHS standards will be shared in training with farmer/workers/local authorities
Timeline and Deadline Date	December 2020
Input (budget/resources)	Temporary social workers, farmers/manav handbooks / institutional visits / communication channel
Responsible staff (title/department)	Manager / Coordinator - Compliance Department

Children on Premises	
Benchmarks <i>CL.9: The employer shall ensure that children (including those residing on the farm and those of migrant workers) are not exposed to dangerous agriculture production activities, including exposure to chemicals/pesticides.</i>	Risk of Noncompliance in all farms
Findings/Noncompliance Explanation:	The monitors noticed that children of migrant groups and the farmers who do not work but accompany their parents were exposed to natural risks such as; falling down at steep places or getting bitten by the insects. <u>Source:</u> Interview with workers and observation during visits.
Company Action Plan	
Activity	Developing Social programme content (improved communication with farmers including women farmers, engaging with the key stakeholders, building staff capacity, revision of policy procedures, workers, labor contractor trainings)
Output indicators (targeted results)	-Workers training will be improved -Training for the cook (the person who stay at the workers shelter) will be provided by Duzce university for the children who remain with them in the shelter during the day - IMS during the harvest will include day-time visits to the shelters in addition to the evening trainings on OHS and good social practices.
Timeline and Deadline Date	October 2020
Input (budget/resources)	Temporary social workers, farmers/manav handbooks / institutional visits / communication channel
Responsible staff (title/department)	Manager / Coordinator - Compliance Department

Removal and Rehabilitation of Child Laborers

Benchmarks		Risk of Noncompliance in seven farms
<i>CL.10.1: 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.</i>		
Findings/Noncompliance Explanation:	Balsu team works to remove children from the farms and convince families to send them to the schools but they are not always successful due to the external factors as well. <u>Source:</u> Observations	
Company Action Plan		
Activity	Developing Social programme content (improved communication with farmers including women farmers, engaging with the key stakeholders, building staff capacity, revision of policy procedures, workers, labor contractor trainings)	
Output indicators (targeted results)	<ul style="list-style-type: none"> -Communication with the local authorities for the referral system and opportunities - Responsible Villagehead man / Leader farmer selected for the villages - More social workers involvement thus more IMS during the harvest (4 social workers will be hired in 2020 from 2 in 2019) 	
Timeline and Deadline Date	October 2020	
Input (budget/resources)	Temporary social workers, farmers/manav handbooks / institutional visits / communication channel	
Responsible staff (title/department)	Manager / Coordinator - Compliance Department	

Health, Safety and Environment

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	HSE.1.	Noncompliance	Farms 5, 6, 7, 8, 9, 10, 11, 12
Document Maintenance, Permits and Certificates	HSE.2 (PR)	In compliance	
	HSE.3.1	In compliance	
	HSE.4 (PR)	In compliance	
Evacuation Requirements and Procedure	HSE.5.1 (PR)	In progress	All Farms
	HSE.5.2	Risk of noncompliance	All Farms
Safety Equipment and First Aid	HSE.6.1 (PR)	In compliance	
	HSE.6.2 (PR)	In compliance	
	HSE.16.3 (PR)	In compliance	
Personal Protective Equipment	HSE.7 (PR)	In progress	All Farms
	HSE.8	In compliance	
Chemical Management	HSE.9.1	In compliance	
	HSE.9.2	In compliance	
	HSE.9.2.1	0	

	HSE.10	In compliance	
	HSE.11.1	In compliance	
	HSE.11.2	In compliance	
Protection Reproductive Health	HSE.12.1	In compliance	
	HSE.12.2 (PR)	In compliance	
Infrastructure	HSE.13 (PR)	0	
	HSE.17.1	Noncompliance	Farm no 6, 7, 8
	HSE.17.2 (PR)	In progress	All Farms
	HSE.19 (PR)	Not Initiated	All Farms
	HSE.21 (PR)	Not Initiated	All Farms
	HSE.22 (PR)	Not Initiated	All Farms
Machinery Safety	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.15.2 (PR)	In progress	All Farms
	HSE.16.2	In compliance	

Assessment Summary

Notable Feature

Labor supervisors' receiving first aid training is a novel development.

General Compliance

Benchmarks:

HSE.1: Employers shall comply with all national laws, regulations and procedures concerning health, safety, and the environment.

Noncompliance in eight farms

Findings/Noncompliance Explanation:

Some of the accommodations of workers are far from being usable. No bathrooms or WCs; there are insects, open roofs caused flood in one case (Farm 11, 12). In general, these do not meet requirements of health and safety.

Source: Observations & Interviews with Workers

Company Action Plan

Activity

Stronger communication with the Government in the local and national level will be sustained.

Output indicators (targeted results)

Improved local commission decision including a note on health and the safety in the agricultural area
 Trainings on OHS will be emphasized at all project villages
 All Balsu Communication channels will be used to give information on OHS
 Minimum one government involved project will be actualized in OHS standards

Timeline and Deadline Date

October 2020

Input (budget/resources)

Balsu Field Team, Temporary social workers, farmers/manav handbooks / institutional visits / communication channel / Compliance Budget / Governmental Sources

Responsible staff

Manager / Coordinator - Compliance Department

(title/department)	
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Evacuation Requirements and Procedure	
Benchmarks: <i>HSE.5.2: Where appropriate, workers shall be trained in evacuation procedures at least once per year.</i>	Risk of Noncompliance in all farms
Findings/Noncompliance Explanation: Workers received HSE trainings on emergency situations but not trained in evacuation procedures especially regarding accommodation areas. <u>Source:</u> Observations & Interviews with workers	
Company Action Plan	
Activity	Distribution of PPE, OHS trainings, Communication throughout the year (SMS, WhatsApp, Newsletter, Brochures, Stickers), Local Health Office Involvement, needs assessment, update on the OHS module
Output indicators (targeted results)	-Due to the training received from Balsu field staff and local authorities, awareness on the evacuation requirement and the procedure will increase. -Minimum 10 Sticker will be placed in the shelters after the training given in front of workers and the farmers in the evacuation of the specific shelter. -Local Ministry office will be included in the trainings.
Timeline and Deadline Date	October 2020
Input (budget/resources)	Balsu Field Team, Temporary social workers, farmers/manav handbooks / institutional visits / communication channel
Responsible staff (title/department)	Manager / Coordinator - Compliance Department

Infrastructure	
Benchmarks: <i>HSE.17.1: Safe and clean potable water for drinking shall be freely available at all times, within reasonable distance of the workplace. For farm settings in water-stressed regions where access to potable water is not always guaranteed, employers shall work with local authorities and other partners to provide clean water in sufficient volume and quality to guarantee the wellbeing of hired and family workers.</i>	Noncompliance in three farms
Findings/Noncompliance Explanation: There are no mobile sanitation offered in farms. When closer to the house workers use the houses, otherwise open air. The farmers do not provide dust and insect free rest and break areas, other than the tree shadows. In Dereköy, there is a shortage of water. The village leader shuts the water down from morning till 9 PM because he says the water is not enough for everyone. The workers try to use buckets to keep some water ready for their return. Apart from this, when it rains (in Elmacık) the water gets muddy and unusable. For now there aren't any initiatives to solve these. Mukhtar wants to talk to the new local governor first. Living quarters in the mentioned farms do not meet health standards at all.	

	<u>Source:</u> Observations - visits to the houses; Interviews with the workers
Company Action Plan	
Activity	Improvement on WASH Programme (Water, Sanitation and the Hygiene)
Output indicators (targeted results)	Balsu each different season makes minimum one direct remediation activity for the community on hygiene standards that could be sustained by the community members afterwards. This year mobile drinking water and hand washing cabinets (not including WC) will be provided at one village and will be supported via updated training on this matter.
Timeline and Deadline Date	October 2020
Input (budget/resources)	Balsu Field Team, Temporary social workers, farmers/manav handbooks / institutional visits / communication channel / Compliance Budget / Governmental Sources
Responsible staff (title/department)	Manager / Coordinator - Compliance Department

Hours of Work

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	HOW.1.1	Noncompliance	All Farms
	HOW.1.2	Noncompliance	All Farms
	HOW.1.3	Noncompliance	All Farms
	HOW.1.4	Noncompliance	All Farms
Rest Day	HOW.2	In compliance	
Meal and Rest Breaks	HOW.3	In compliance	
Protected Workers	HOW.4.1	Noncompliance	All Farms
	HOW.4.2 (PR)	Not Initiated	All Farms
	HOW.4.3	Noncompliance	All Farms
Overtime	HOW.5.1	Noncompliance	All Farms
	HOW.5.2	Noncompliance	All Farms
	HOW.6.1	Noncompliance	All Farms
	HOW.6.2	Risk of noncompliance	All Farms
	HOW.6.3 (PR)	In progress	All Farms
	HOW.7	Risk of noncompliance	All Farms
Public Holidays and Leave	HOW.8.1	In compliance	
	HOW.8.2	In compliance	
	HOW.8.3	N/A	
	HOW.9	N/A	
	HOW.10.1	In compliance	
	HOW.11 (PR)	In compliance	
	HOW.12.1 (PR)	In compliance	
	HOW.12.2 (PR)	In compliance	
	HOW.13	In compliance	

HOW.14	In compliance	
HOW.15 (PR)	In compliance	
HOW.16 (PR)	In compliance	

Hours of Work Assessment Summary

Notable Feature

As a good practice in the assessed farms workers quit working at 18.30, so the usual 7-7 working hours is reduced by half an hour.

General Compliance

Benchmarks:

HOW.1.1: Employers shall comply with all national laws, regulations and procedures concerning hours of work, public holidays and leave.

HOW.1.2: In countries where local law does not set out hours of work specific to the agriculture sector, the participating company shall consult with local stakeholders representing the employers (farmers), workers and civil society to define the hours of work. As a general principle, the total hours of work: (1) shall not exceed the number of work hours freely (individually and/or collectively) agreed upon by workers, including that all overtime work is consensual; (2) shall not adversely affect workers' physical and mental health; (3) shall allow for adequate breaks and rest periods during a working day, as determined by the workers, including at least 24 consecutive hours of rest in every seven-day period; and (4) shall be fully compensated according to legal requirements or worker agreements, whichever is more favourable to workers.

How.1.3: Other than in exceptional circumstances or during short-term seasonal work as described under HOW.2, the total weekly work hours (regular work hours plus overtime) shall not exceed 60 hours per week or the legal limit, whichever is lower. The upper limit during a working day shall not exceed 12 hours.

How.1.4: When workers' accommodations and transport is organized by the employer, or when workers are transported from one site to another during a working day, travel time to the field shall be part of working time calculation.

**Noncompliance
in all farms**

Findings/Noncompliance Explanation:

The workers have 1 hour of lunch break and 30 minutes of rest breaks (15 in the morning 15 in the afternoon). As a consequence, workers work 10,5 - 10 hours a day. In this case, since some farmers reduced the work hours by half an hour they work less than 10.5 hours. The local commission guidelines in terms of working hours exceed national regulations, FLA and the Balsu Code of Conduct.

Source: Observations & Interviews

Company Action Plan

Activity	Stronger communication with the Government in the local and national level will be sustained.
Output indicators (targeted results)	Improved local commission decision including a note on hours on work Trainings on working hours will be emphasized at all project villages All Balsu Communication channels will be used to give information on working hours (including the social media)
Timeline and Deadline Date	October 2020
Input (budget/resources)	Balsu Field Team, Temporary social workers, farmers/manav handbooks / institutional visits / communication channel / Compliance Budget / Governmental Sources
Responsible staff (title/department)	Manager / Coordinator - Compliance Department

Protected Workers (pregnant or nursing women, young workers)

<p>Benchmarks:</p> <p><i>How.4.1: The workplace shall comply with all applicable laws governing work hours regulating or limiting the nature, frequency and volume of work performed by pregnant or nursing women or young workers.</i></p> <p><i>How.4.3: If not provided by law, employers must provide protection to workers who allege violations of laws governing work hours limiting the nature, frequency and volume of work performed by pregnant or nursing women or young workers.</i></p>		Noncompliance in all farms
<p>Findings/Noncompliance Explanation:</p>	<p>The monitors observed only one pregnant women on the field. The young workers and child workers were observed of doing the same job and working same hours as the adults and monitors understood from the regional practices that pregnant or nursing women have the same working conditions. The pregnant, nursing and young workers should have differentiated work schedule. According to local law and FLA benchmarks, young workers should not work more than 40 hours a week. In most of the cases, the adult workers distribute the heavy jobs among themselves hence trying to protect the special group of workers.</p>	
<p>Company Action Plan</p>		
<p>Activity</p>	<p>Developing Social programme content (improved communication with farmers including women farmers, engaging with the key stakeholders, building staff capacity, revision of policy procedures, workers, labor contractor trainings)</p>	
<p>Output indicators (targeted results)</p>	<p>-Farmers handbook will be revised</p> <p>-Farmers record keeping will be improved (young workers, pregnant workers or other special conditions note will be included)</p> <p>-Good samples in regards to the pregnant women's' hours and tasks will be shared</p> <p>-Detailed need assessment of pregnant women or people in special needs for OHS standards will be shared in training with farmer/workers/local authorities</p>	
<p>Timeline and Deadline Date</p>	<p>December 2020</p>	
<p>Input (budget/resources)</p>	<p>Temporary social workers, farmers/manav handbooks / institutional visits / communication channel</p>	
<p>Responsible staff (title/department)</p>	<p>Manager / Coordinator - Compliance Department</p>	

<p>Overtime</p>		
<p>Benchmarks:</p> <p><i>How.5.1: Where national laws, regulations and procedures allow it, employers may calculate regular hours of work as an average over a period of longer than one week, provided all formal and procedural requirements attached to such calculation are met (for instance, obtaining official permission from the relevant authorities or observing limits to the period during which such calculations can be made). However, for the purpose of overtime calculation, regular hours of work may not exceed 48 hours per week, irrespective of whether national law provides or not a limitation.</i></p> <p><i>How.5.2: Payment of overtime rates is unaffected by a calculation that spreads total hours over more than one week.</i></p> <p><i>How.6.1: Employers shall not require workers to work more than the overtime hours allowed by the law of the country where the workers are employed.</i></p> <p><i>How.6.2: All overtime work shall be voluntary.</i></p> <p><i>How.7: Employers shall be able to provide explanation for all periods when the exceptional circumstances exception has been used. Clear communication and consultation will be held with workers and any extended hours of work will be levied upon obtaining (verbal / written) consensus from the workers.</i></p>		Noncompliance in all farms
<p>Findings/Noncompliance Explanation:</p>		
<p>FLA benchmarks require that maximum daily working hours cannot exceed daily 12 hours and weekly 60 hours with overtime. Considering the fact that they work for the whole week, weekly working hours reach to 73.5 hours. Monitors also understood that the workers might work more than 10,5 hours a day when an</p>		Risk of Noncompliance in all farms

	<p>orchard is close the completion. In one farm we observed that overtime is paid. There is no mechanism to verify that workers consent to working overtime. During the interviews with the workers, almost all workers complained about the long working hours. They had to accept these working terms at beginning of the season because of the general practice and board's decision.</p> <p><u>Source:</u> Interviews & Observations & Board Report</p>
Company Action Plan	
Activity	Developing Social program content (improved communication with farmers including women farmers, engaging with the key stakeholders, building staff capacity, revision of policy procedures, workers, labor contractor trainings)
Output indicators (targeted results)	<p>Increased knowledge of farmers and workers' awareness on the overtime. A sample form will be handed to the farmers through farmers handbook. Good samples for the working hours and overtime payments will be shared Calculation method will be stressed out Local employment agency will be included at the workers and farmers trainings</p>
Timeline and Deadline Date	October 2020
Input (budget/resources)	Temporary social workers, farmers/manav handbooks / institutional visits / communication channel
Responsible staff (title/department)	Manager / Coordinator - Compliance Department

Compensation

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	C.1.1	In compliance	
	C.1.2	Noncompliance	Farm 11, 12
	C.1.3	In compliance	
	C.1.4	In compliance	
Minimum Wage/Fair Compensation	C.2.1	Noncompliance	Farm 11, 12
	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)	In compliance	
	C.2.6 (PR)	In compliance	

	C.3	In compliance	
Farmer/Producer Income	C.4 (PR)	In compliance	
Wage Payment and Calculation	C.6	In compliance	
	C.7.1	In compliance	
	C.7.2	In compliance	
	C.7.3 (PR)	In compliance	
	C.7.4 (PR)	In compliance	
	C.7.5	In compliance	
	C.8.1	Noncompliance	All Farms
	C.8.2	Risk of Noncompliance	All Farms
	C.8.3	Noncompliance	All Farms
	C.8.4 (PR)	Not Initiated	All Farms
	C.9 (PR)	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	In compliance	
	C.11.1.2	In compliance	
	C.11.1.3	In compliance	
	C.11.1.4	In compliance	
	C.11.1.5	In compliance	
Fringe Benefits	C.13 (PR)	In compliance	
	C.12.1	In compliance	
	C.12.2 (PR)	Not Initiated	All Farms
	C.12.3	In compliance	
	C.12.4	In compliance	
	C.12.5	In compliance	

Compensation Assessment Summary

Notable Feature

In the assessed farms there was only one group with contractor deduction. 10.00 AM breakfast is provided by the farmers.

General Compliance

Benchmarks:

C.1.2: Other than lawfully required deductions, no other deductions may be made from a worker's compensation without the written consent of the worker. Financial disciplinary measures are prohibited.

**Noncompliance
in two farms**

Findings/Noncompliance Explanation:

The 10% deduction of labor contractor constitutes noncompliance in farm 11, 12.
Source: Interviews with the workers

Company Action Plan

Activity

Developing Social program content (improved communication with farmers including women farmers, engaging with the key stakeholders, building staff capacity, revision of policy procedures, workers, labor contractor trainings) / Labor contractor training with national government offices and the local stakeholder; both origin and hazelnut producing cities

Output indicators (targeted results)

The agreement which are expected to be signed by the farmer and the labor contractor; will include hours, wages and deductions; and will be shared with workers, employers and labor contractors.

	At the training the concept in regard to the minimum wage will be stressed out (it will be related to deductions) Remuneration/ calculation method and deduction will be included in the contracts
Timeline and Deadline Date	Temporary social workers, farmers/manav handbooks / institutional visits / communication channel
Input (budget/resources)	Manager / Coordinator - Compliance Department
Responsible staff (title/department)	Temporary social workers, farmers/manav handbooks / institutional visits / communication channel

Minimum Wage/Fair Compensation	
<p>Benchmarks: C.2.1: Employers shall pay workers at least the legal minimum wage, the prevailing industry sector wage, or the wage pursuant to Collective Bargaining Agreements that are in force, whichever is higher, for regular working hours (not including overtime). Hourly or daily compensation shall be calculated based on the legal minimal wage, the prevailing industry sector wage, or the wage pursuant to Collective Bargaining Agreements that are in force, whichever is higher. Workers should also be informed by the employer about the legal minimum wage applicable to them.</p>	Noncompliance in two farms
Findings/Noncompliance Explanation:	<p>The labor contractors deduct 10 % commission from the workers' wages, which then reduces the workers' wages to 77 Liras, so below the legal minimum wage. The Ministry has announced the minimum legal wage for 8 hours while the local commission uses same wage as a basis for 10,5 hours. This reduces the hourly wage under usual legal working hours and the FLA Codes.</p> <p><u>Source:</u> Interviews with Workers & Observations</p>
Company Action Plan	
Activity	Developing Social program content (improved communication with farmers including women farmers, engaging with the key stakeholders, building staff capacity, revision of policy procedures, workers, labor contractor trainings) / Labor contractor training with national government offices and the local stakeholder; both origin and hazelnut producing cities
Output indicators (targeted results)	<p>The agreement which are expected to be signed by the farmer and the labor contractor; will include hours, wages and deductions; and will be shared with workers, employers and labor contractors.</p> <p>At the training the concept in regard to the minimum wage will be stressed out (it will be related to deductions) Remuneration/ calculation method and deduction will be included in the contracts</p>
Timeline and Deadline Date	Temporary social workers, farmers/manav handbooks / institutional visits / communication channel
Input (budget/resources)	Manager / Coordinator - Compliance Department

Responsible staff (title/department)	Temporary social workers, farmers/manav handbooks / institutional visits / communication channel
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Wage Payment and Calculation

Benchmarks: <i>C.8.1: Employers shall compensate workers for all hours worked.</i> <i>C.8.3: Workers shall be informed in writing or orally where necessary, in language(s) spoken by workers, about overtime wage rates prior to undertaking overtime.</i>	Noncompliance in all farms
<i>C.8.2: Employers shall comply with all applicable laws, regulations and procedures governing the payment of premium rates for work on holidays, rest days, and overtime. There might however be specific working schemes voluntarily agreed by the workers to work on holidays and rest days for short-term seasonal work, which would make this provision not applicable.</i>	Risk of Noncompliance in all farms

Findings/Noncompliance Explanation:	Migrant workers work 10.5 and locals 9.5 hours a day. This is above the national law and FLA benchmarks stating 8 hours a day. According to the law and benchmarks the farmer should compensate workers for all hours worked. That means these excess hours must be calculated as overtime. However farmers pay workers the minimum legal daily wage announced by the Ministry for a 9.5 or 10.5 hours working day. In this context workers are also not informed about overtime wage rates. <u>Source:</u> Interviews with Workers & Observations
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Company Action Plan

Activity	Developing Social program content (improved communication with farmers including women farmers, engaging with the key stakeholders, building staff capacity, revision of policy procedures, workers, labor contractor trainings) / Labor contractor training with national government offices and the local stakeholder; both origin and hazelnut producing cities
Output indicators (targeted results)	The agreement which are expected to be signed by the farmer and the labor contractor; will include hours, wages and deductions; and will be shared with workers, employers and labor contractors. At the training the concept in regard to the working hours will be stressed out (it will be related to deductions also- dangers to the exceeding daily working hours) Daily working hours, Remuneration/ calculation method and deduction will be included in the contracts Good samples as per working hours within the community will be shared
Timeline and Deadline Date	Temporary social workers, farmers/manav handbooks / institutional visits / communication channel
Input (budget/resources)	Manager / Coordinator - Compliance Department
Responsible staff (title/department)	Temporary social workers, farmers/manav handbooks / institutional visits / communication channel

Total number of Farms: 12

	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
% of farms with non-compliances or risk of non-compliances	100%	100%	0%	100%	13%	0%	100%	0%	100%	
Farm No. 1	8	1	0	2	4	0	1	11	3	30
Farm No. 2	8	1	0	2	4	0	1	11	3	30
Farm No. 3	8	1	0	2	4	0	1	11	3	30
Farm No. 4	8	1	0	2	7	0	1	11	3	33
Farm No. 5	8	1	0	2	4	0	2	11	3	31
Farm No. 6	8	1	0	2	7	0	3	11	3	35
Farm No. 7	8	2	0	2	8	0	3	11	3	37
Farm No. 8	8	1	0	2	6	0	3	11	3	34
Farm No. 9	8	3	0	2	7	0	2	11	3	36
Farm No. 10	8	3	0	2	4	0	2	11	3	33
Farm No. 11	12	1	0	2	7	0	2	11	5	40
Farm No. 12	12	1	0	2	7	0	2	11	5	40
TOTAL	104	17	0	24	69	0	23	132	40	409