



COVID-19 FOCUSED REPORT OF OLAM'S HAZELNUT SUPPLY CHAIN IN TURKEY'S PRODUCTION REGIONS OF SAKARYA AND DUZCE – 2020

Introduction and Assessment Objectives

In 2020, in addition to the standard Fair Labor Association (FLA) assessments, the FLA collected information on the impact of the COVID-19 pandemic and related access and movement restrictions on labor rights.

The FLA designed the COVID-19 focused assessment to measure the heightened risks at the farm level for workers and their families, especially in the areas of changing workers' demographics, risks for migrant workers, increased expenses to seek job opportunities due to heightened travel costs, COVID-19 related health risks, and workers' access to grievance mechanisms and public services.



Worker Training in Sakarya

Even with restricted access and movement, the FLA maintained independence through the use of local assessors. The FLA accredited assessors (Asya Consultancy) were able to collect information independently in the Sakarya and Düzce regions of Turkey, from producers, workers, the Olam management and field staff. Findings presented in this report were supplemented by information collected by the FLA assessors from the local civil society organizations and labor intermediaries.

An internal management systems (IMS) evaluation and documentation review was undertaken as well in 2020. The FLA focused on interventions taken by Olam to mitigate COVID-19 related risks in its supply chain while undertaking 2020 IMS evaluation.

This report presents the findings from the assessment conducted in Turkey during 24-27 August 2020 in Olam's hazelnut supply chain and consists of four main chapters. In the first chapter, data collection methods and sampling rates are presented. The second chapter introduces national context and coronavirus related developments, while the third chapter presents the findings of Olam's Internal Monitoring System review, results of the worker, producer and stakeholder interviews. The final chapter provides an overview on the main findings against FLA Agriculture Code benchmarks.

I. Data Collection

Two assessors (A.Kadir Tasdelen and Ozgur Tulumbaci) from Asya Control Certifications & Consultancy collected both field level and internal management level data between 24-27 August 2020.

For Internal Management System (IMS) evaluation, face-to-face IMS management interviews and documentation reviews at the company's office were conducted with remote support of the lead assessor. The lead assessor followed all operations remotely and crosschecked the collected through the remote desk-based studies.

For field level data collection, assessors:

- Interviewed face to face a total of 12 adult male producers supplying hazelnut to the company (one producer in Arabacı, four producers in Aktaş, three producers in Paşalar and four producers in Kuyumculu villages). Producers in Kuyumculu of Karasu-Sakarya were selected from a list of 30 producers generated by the FLA through random sampling. Producers in Aktaş, Arabacı, Koşullu and Paşalar villages of Akçakoca-Düzce were selected from another list of 30 producers identified randomly.
- Visited 12 migrant workers' groups working for 12 interviewed producers. The assessors interviewed a total 55 workers out of these groups, considering the COVID-19 measures.
- Conducted remote meetings with the representatives of the Department of Social Service at Düzce University, Eyka Education Center and Women on Road for Hazelnuts and Children on Pitch Project under scope of stakeholder interviews.

II. COVID-19 Related Country Background

Turkey was a country with low risk of COVID-19 (as of mid-late August) where partial field-visits could be undertaken by FLA designated assessors. It is reported that producers in the region experienced some hardships in the pre-harvest season due to COVID-19 movement restrictions, but the agricultural fieldwork largely continued as usual as if the pandemic had not occurred during the harvest period. The assessors observed that producers and workers did not make drastic changes in their plans for 2020 Harvest due to COVID-19 and their working habits largely remained the same as the previous years.

In these circumstances, assessors could continue with in-person visits to the farms with precautions (based on the FLA COVID-19 Guidance to Assessors), where assessors in consultation with the company staff felt assured that the activities could proceed with necessary precautions and measures, without threat to personal health and safety.

Nationwide Restrictions

During the early COVID-19 period (mid-March till mid-June) when the authorities had implemented restrictions of travel, many companies converted their meetings and assessments to remote online meetings in order to avoid contamination to the pandemic. After mid-June up to date the companies have started returning to the “new-normal” by mitigating measures. It is still preferred to perform meetings and assessments remotely wherever possible.

When the pandemic hit, Turkey had followed a controlled lockdown mainly revolving around containing the virus by limiting social interaction and movement at an early stage of the pandemic. General curfew for the weekends and national holidays for slowing down the spread of the virus was implemented during early stages. Curfews for certain age groups (under 20 and over 65 years) was implemented by exempting agricultural producers and workers. Lockdown measures were covering closure of social places such as shopping malls, shops, mosques and limitation of travel between cities. Similar to what happened in other countries, the plan to reopen was developed by the government and set in motion mid-June.

Precautionary Measures for Seasonal Migrant Workers

Seasonal migrant workers were permitted to travel to their workplaces under certain conditions. Risk mitigation measures were taken by the authorities at the cities of origin and arrival locations of the seasonal workers according to “The Regulation of The Community Health Centre and Related Units, the Decree of The Premiership with number 2017/6 and the Letter of the Ministry of Interior dated 03.04.2020 with number 6202”.

For the travel phase, making clear informative announcements about the rules to follow during the trip, decreasing the number of passengers (half capacity of each vehicle) and providing hand antiseptic in the vehicles, isolating passengers infected with COVID-19 and taking fever measurements were required.

Various risk mitigation measures were identified by the government, such as fever checks, registration by police headquarters, notification of workers about rules, notification of group leaders and labor supervisors about actions to be taken with positive cases, decreased contact with local community, wearing mask at closed and crowded places, leaving distance between accommodation units, decreasing the number of workers accommodating in units, providing a daily ration of 15-40 liters to each worker, planting a minimum of one toilet and one tab for ten workers, planting a minimum of one shower for 30 workers, locating toilets with a specific distance to accommodation units, and identifying one representative of the group for shopping duties.

III. 2020 COVID-19 Assessment Findings

a. Company's Internal Management Systems (IMS) Evaluation

Olam has been implementing the Fair Labor Program in Turkey since 2013 and has participated in multiple FLA projects targeting to improve working conditions in the hazelnut production. It is an experienced company in managing social compliance and labor management programs at the upstream supply chain. Being an experienced company in managing social compliance and labor management programs at the upstream supply chain, overall internal management system performance of the Olam evaluated well.

A total of four main areas were identified within the scope of the COVID-19 IMS assessment, namely awareness building and training in supply chain, facilitating the access to grievance mechanism, monitoring and data management and access to remedy and public services.

| FLA Principles and Company Actions on COVID-19 | |
|--|---|
| AWARENESS BUILDING AND TRAINING IN SUPPLY CHAIN AND OTHER MITIGATION EFFORTS | |
|  <p style="text-align: center; background-color: white; border: 1px solid black; padding: 2px; margin-top: 5px;">Informative Posters in Kurdish</p> | <p>The company had planned training for producers, agricultural workers, labor contractors and intermediaries and had organized a limited number of these trainings before the COVID-19 broke out. WhatsApp and message groups were created during the COVID-19 and some training were delivered to producers remotely and through phone calls.</p> <p>The company has started face to face training with workers and producers after the restrictions were lifted and during the harvest period. Besides information about workers' rights, they also gave information about the use of masks, hygiene materials and general information about COVID-19 and related measures. They distributed masks, hygiene kits, disinfectants during the harvest to producers and agricultural workers.</p> <p>The company has prepared and gathered brochures, posters and booklets about COVID-19 and related measures to control it. They have distributed or posted these for increasing awareness of workers,</p> |

producers, labor contractors and intermediaries.

90% of the company staff have hazelnut gardens. They all take annual leaves and harvest their own crop. The company has trained its own staff about COVID-19 and uses them as role models of good practices in their own villages. In this way they contribute to the increase of awareness.

FACILITATING ACCESS TO GRIEVANCE MECHANISMS

The company has a grievance procedure and mechanism. They have a hotline meant for grievances of producers and workers.

The company hotline is available and free of charge. They have communicated the number on the posters and informed the producers and workers during training. The company has also distributed a sustainability handbook to producers where complaint forms are available.



Poster with Hotline Information

The line is available in Turkish, Kurdish, Arabic and Georgian. It can also be reached online. The monitors checked the hotline by a trial call and found out that it was working.

However, it should be noted that some of the interviewed workers were not aware of the company hotline and where they could use this for. The workers in general reported that if needed, they would call emergency number 112, department of health grievance hotline 184 or the police. It is also expressed that most of the time, workers prefer to share their complaints with supervisors, labor contractors or producers. So, the company has not received any grievance from migrant workers regarding their rights, working conditions or health and safety issues.

MONITORING AND DATA MANAGEMENT

The company could not initiate their internal monitoring before the start of harvest season due to COVID-19 restrictions. The company did not have results of internal monitoring during the time of assessments and their monitoring visits were in process during assessments.

REMEDIATION AND ACCESS TO PUBLIC SERVICES

The company could not follow its standard process of internal monitoring and remediation because of the COVID-19 restrictions in 2020. They focused on some remediation actions such as awareness building, training activities and distribution of PPE, hygiene packs and disinfectants at time and place when they detected shortcomings during monitoring.

Olam has been fighting against child labor for a long time. Every year, summer schools and safe spaces are created to prevent child labor and to create opportunities for children to develop new skills during the harvest period. Additionally, social training is conducted with farmers, labor contractors and workers by Olam social workers. However, the Ministry of National Education and local governments allowed a safe area for children only within walking distance to avoid public transport due to COVID-19 measures in 2020. Under these conditions, a limited number of safe areas were created during the 2020 harvest period; Olam cooperated with ILO and the Ministry of Family Labor & Social Services for Fatsa İslamdağ Summer School.

Also, children were provided with personal educational and hygiene packs, breakfast, and lunch within the scope of 2020 activities. Coloring books, crayons and games were provided for 93 children staying at home with the cook where the summer school could not be opened due to the pandemic.

b. Interview with PEA, Workers, Producers and Stakeholders

All 12 producers that had been visited had employed migrant workers from Southeastern provinces of Turkey, such as Şırnak, Mardin, Diyarbakır, Sanliurfa and Batman for the 2020 harvest. The producers reported that they employed migrant workers in previous years too.

Two producers reported that they have employed less workers than last year, while one producer said that his work force had increased. All changes were due to changing crop yield compared to last year and nothing to do with COVID-19. The monitors observed that producers and workers did not see any reason for changing their plans for the harvest and work habits of previous years. They clearly reported that COVID-19 had no effect on their decision of harvest work this year.

Findings of stakeholder interviews demonstrate that whether there has been a change in worker profile or not remains unclear. Representative of Düzce University reports that according to their observations the profile of the agricultural harvest worker has become younger. Representative of *Girls on The Football Field* project expresses that the workforce profile was similar to last year; the profile of migrant worker groups in terms of age, gender, number of siblings, the province they come from, their socio-cultural and socio-economic structure were very similar to previous years. Representatives from Eyka Education Center reported that the number of workers has decreased depending on yield, emphasizing that the producers need migrant workers from the Southeast provinces and the migrant workers need the job to sustain their livelihoods.

Although the assessors interviewed 55 workers form 12 worker groups, it is reported that the total number of harvest workers working on the visited gardens were reported to be 165. Overall, women workers outnumber men. Out of these 97 were female workers and 68 male workers.

| | Number (Overall) | Percentage |
|--------|------------------|------------|
| Female | 97 | 59% |
| Male | 68 | 41% |

Among the interviewed workers, 26 workers are female, and 29 workers are male.

In terms of age, it is seen that the workforce is young. Most interviewed workers are 29 years old or below.

| | Number | Percentage |
|--------------------------------------|--------|------------|
| Below 18 y.o. (15 - 17 years old) | 22 | 40% |
| 18-29 y.o. | 26 | 47% |
| 30-39 y.o. | 3 | 5% |

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| 40-49 y.o. | 3 | 5% |
| 50-59 y.o. | 1 | 3% |

22 interviewed workers are aged below 18 years old. The ages of the young workers were 15, 16 and 17. Among this group, nine are female and 13 are male. Limited number of the interviewed workers (25%) claim that they observed an increase in the number of young workers this year.

The majority started to work in the farms in August undertaking harvest related tasks. 78% worked with the producer for the first time in 2020.

Workers claim that COVID-19 has not impacted their work significantly in hazelnut harvest. Only four workers claimed to face higher transmission risks due to the high-density housing and transportation.

However, 67% expressed that COVID-19 impacted their lives in one way or another:

- 42% fear of getting infected with COVID-19 while working (though none have reported COVID-19 cases in their families).
- For 73%, there has been loss in family income since the beginning of the pandemic. (other family members lost their jobs, or their salaries were reduced).
- 59% claim that their own income has been reduced due to reduction in working hours or work assignments.
- The cost of living has increased for 73%, especially the cost of food (for 71%).

Also, three workers expressed that they received financial support to deal with the impact of COVID-19 (1,000 TL one-time payment for people without income).

Recruitment Process of Workers (including migrant workers)

59% of the workers claimed that they had difficulties in getting employment this year due to COVID-19. It should be noted that most of the interviewed workers started to work in the farms in August, the month that normalization movement reached its peak, and they had a considerably “normal” harvest experience. However, recruitment usually starts much earlier, in spring, especially for seasonal migrant workers. Agricultural intermediaries and workers shake hands in their cities of origins to work together for upcoming months. Doubtless, 2020 Spring was a period of uncertainty for all parties. Additionally, they had to consider that there were multiple demotivating factors, which were explained by the producers (social distancing measures during transportation phase and in the harvest region).

Otherwise, recruitment practices did not change in 2020 in the region. According to traditional recruitment practices, agricultural intermediaries are still the main players in recruiting seasonal migrant workers. The intermediaries supply the employers with seasonal workers they need and at same time they ensure employment for the workers. They match the labor supply and demand at certain times and for certain numbers and qualifications of labor in exchange for payment. Landowners or farmers contact intermediaries mainly months in advance when they need workers and inform them how many workers they need. Legally, intermediaries must hold an Agricultural Intermediation Permit, however, as the agricultural sector in Turkey is ruled mostly by informal dynamics and working relations, intermediaries operate informally. Besides, their level of organization is very low and inspections by public authorities are very weak. On the other hand, they have an important role in the income and living conditions of seasonal agricultural migrant workers.

Besides intermediating between employers and workers, the intermediaries deal with various tasks related

to workers, such as dismissal, scheduling work program, taking commission from worker's wages, manage transportation from their hometown to the production sites and again between living space and the farms, shopping for their daily needs of consumer goods (worker pays for their portion), providing advances and loans and manage their relations with various institutions such as hospitals and schools.

Once the employer has reached agreement with the agricultural intermediary on the date on which the work is to be completed, the workers' wages, the number of workers and the intermediary's commission, the intermediary takes all the responsibility for getting the work done. The intermediary finds workers, ensures their transportation to the field, acts as a supervisor during the work and pays the workers after the work is completed. This arrangement relieves employers of a heavy burden of transaction and management costs. In some cases, the presence of the agricultural intermediary also helps to overcome the language barriers and issues of cultural difference that might arise between employers and workers. Consequently, intermediaries fulfil an important function in the smooth operation of agricultural production, the recruitment of labor for the employer, and the provision of employment for the workers.

Intermediaries usually do not sign written contracts with the employers or the seasonal workers, but they have verbal agreements. The negotiations start in January. Some farmers pay an advance payment of 5 to 10% of the expected wages they will earn, to book the workers. Farmers mainly work every year with the same intermediary who already knows their request for the number and profile of workers.

Working Conditions During COVID-19



Interviewed producers and workers state that working conditions have not been affected by COVID-19. Producers indicated that they knew the legal working as information was provided by the local authorities. According to this all seasonal agricultural workers are working the same hours; from 7 am to 7 pm with an hour lunch and two breaks of 15 minutes each, so the total working hours make 10,5 hours a day. One of the interviewed producers had reported that he had decreased working hours by one hour from 7.30 am to 6.30 pm. Overall, there were no adjustments in working hours. Additional breaks for cleaning or shift adjustments were not applied at any garden.

COVID-19 did not cause any major change on the compensation side either. The producers are paying the workers the daily wage announced by the governorship which is 98 TL. None of the workers were asked to accept salary deductions, pay deductions, wage givebacks, or any other measure or deduction during the COVID-19. In the past, the producers used to cover expenses such as a one way

or return transportation costs and food. It is observed that this practice has gradually decreased because of the competition among labor contractors. Since all these costs increased in 2020 due to COVID-19, the erosion of these practices worsened workers' financial concerns.

However, 60% said that they cannot take sick leave without any payment deductions or penalties; 31% is not sure if there would be deductions or not in this case. Additionally, all workers expressed that their employer did not increase health benefits (beyond the regular benefits to prevent sick workers from coming to work; or seek medical advice) during COVID-19. No sick leaves including COVID-19 cases were observed or reported during interviews ,but producers explained that in Turkey, public hospitals are authorized accepting any COVID-19 patient regardless of the social security scheme they are covered by. People who

don't have any social security coverage would have access to COVID-19 diagnosis, treatment, COVID-19 related PPEs and services too.

It is seen that the company has provided channels for grievances. 47% of interviewed workers claimed to have access to grievance channels to provide feedback or raise questions around the adjustments to working arrangements needed due to COVID-19. Except for one worker, none had used these channels before. The remaining workers are either not sure if they have access to grievance channels or think they do not have access. It is understood that they prefer sharing grievances with their supervisors, labor contractors or producers.

The company is encouraging producers and labor contractors for signing a written agreement with seasonal agricultural workers. However, most of the interviewed workers do not remember having signed a written agreement. They refer to their verbal agreement with labor contractors and producers when they talk about contracts.

COVID-19 Measures at Workplaces and Points of Accommodation

84% feel that the employer has taken adequate measures to protect them from being infected by COVID-19 at the workplace. There are question marks for the remaining workers as their work during harvest does not allow them to take social distancing measures in the gardens. The assessors observed that in the visited areas, hazelnut branches are shrugged and those that spill on the ground are collected by leaning from the ground. Because the group of workers collects hazelnuts from the floor by scanning the area manually, there is usually one arm distance between them (80-90cm). Even if some of the producers said that they were warning workers to leave a distance of 1.5-2 meters, they also know that this is not possible. Otherwise, most of the hazelnuts cannot be collected. It should be also noted that most of the worker groups belong to the same family, thus they share the same accommodation facilities. For those worker groups, implementing a distancing measurement is not applicable.

Based on the interviewed workers' and growers' responses, it is understood that nine producers conducted COVID-19 related training for workers. Trainings covered the topics listed below:

- Additional cleaning and sanitization of work tools and areas.
- Additional PPE (e.g., facial masks or gloves) and their proper uses.
- Proper distancing and guidance on how to achieve proper distancing during work.

However, it is understood that COVID-19 related information has been made available in visible and key locations by half of the producers. Six growers have information posters hanging in gardens, village squares and village coffee houses.

The company and most of the producers have provided masks and disinfectants for workers free of charge with replacement sufficiently available. One producer and his workers reported they did not receive any PPE.

On the other hand, proper cleaning and disinfection of tools and provision of cleaning supplies is a subject that has room for improvement. Cleaning and taking sanitary measures are for points of accommodation; but not the priorities of the working area.

Workers' and producers' responses indicate that a limited number of producers made adjustments in housing to maintain distancing and isolate the sick workers. Most of the producers' state that the houses they provide for workers are small and do not have required space to mind social distancing rules. About 15 people live

in these two to three rooms. In case of a COVID-19 positive case workers would be in high risk of infection. However, it is also noted that workers were accommodating with family members, so that they would stay isolated and keep their social distance with others.

In terms of transportation, one producer reported that he is considering social distance and transporting workers as family members in one go. Workers at six producers are transported on top of each other in tractor trailers, “patpats,” together with hazelnut sacks, side by side as 10-15 workers on the same vehicle. Five producers reported their gardens are at walking distance and they walk all together with workers and keep safe of COVID-19.

IV. Farm Level Workplace Standards Evaluation

COVID-19 brought certain changes such as COVID-19 specific training and adjustments in the field in the Olam supply chain. Beside these changes, it is seen that COVID-19 had no significant impacts or changes on producers’ or workers’ harvesting habits.

The gaps identified in terms of farm level workplace standards are presented below.

| SUMMARY OF FLA IEM FINDINGS | SUMMARY OF COMPANY COMMITMENTS (Corrective Action Plan) |
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| HOURS OF WORK AND COMPENSATION | |
| <ul style="list-style-type: none"> The seasonal migrant agricultural workers receive a daily wage of 98 TL regardless of their daily working hours. Adult workers above 18 years old who work above weekly 45 working hours do not receive any overtime payment. | <ul style="list-style-type: none"> According to the feedback from the field and the common observations of the Olam social workers, intermediation between farmers and workers should be managed by certified labor contractors in order to legalize the work process and prevent violation of labor rights. For this purpose; It will be ensured that certified labor contractors and seasonal migrant workers participate in the provincial committees where their voices can be heard while the decisions are taken by the public authorities. Through participation of both sides, negative effects of the competitive labor contractor sector can be detailed. It is aimed that lack of overtime payments will be prioritized by the public authorities through representation from both parties. <ul style="list-style-type: none"> Four labor contractors and six seasonal migrant workers will participate in the committee meetings in the provinces of Sakarya and Duzce. As COVID-19 reminds us, access to affordable nutritious food is important for human health and well-being especially in the conditions requiring long working hours. Food security has not been put on the |

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| | <p>agenda of the provincial committees determining wages and working hours of the workers. Olam social workers would recommend the committee members that lunch expenses should be either directly covered by the employer (farmer) or reflected in the daily wages.</p> <ul style="list-style-type: none"> • Workers' travel costs have increased due to transportation restrictions within the scope of COVID-19 measures. The cost per person will be calculated on the wage basis by Olam social workers. In this way, the transportation cost will be used as a reference while negotiating the minimum wage for seasonal migrant workers. • Awareness raising activities will be carried out on working hours and overtime payment for farmers recruiting seasonal migrant workers. Working hours and overtime payment will be separately detailed in the training conducted by Olam social workers. Relevant social media content on the minimum daily wage, working hours and overtime payment will be shared through Olam social media channels. Informative posters on legislation showing working conditions including but not limited to working hours and payment will be put in the village centers before and during the harvest period. SMS messages about working hours, relevant laws and the effect of long working hours will also be sent to the farmers in the supply chain. <ul style="list-style-type: none"> - 580 SMS will be sent to 580 farmers in Akçakoca and Karasu districts. - Informative posters on the working conditions will be put in place in Akçakoca and Karasu districts. - 580 farmers will be trained on “working hours” and “discrimination.” - Relevant video and photos will be shared through Olam’s social media accounts. • At the beginning of 2020, IMS staff drafted a wage receipt for records about the payment of wages and included them in notebooks to be distributed to workers. Due to the delay caused by the printing agency, the field work was also delayed, and the notebooks could not be distributed to the farmers and workers on time. This year, planning has already been made to avoid inconvenience in the upcoming harvest period. In addition, "Annex-1 Insurance and Wage Payment Agreement", expressing the ways |
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| | <p>workers receive their wages, was created and included in the QMS (Quality Management System). Wage payment and records will be monitored by social workers during the 2021 harvest period.</p> <p>Responsible staff: Arif Fidan, Gulbeyaz Cinar (Social Workers).</p> |
| <p>CHILD LABOR</p> | |
| <ul style="list-style-type: none"> • Olam has been working on increasing awareness of producers towards age verification and prevention of child labor. However, producers do not implement an age verification. Although it is not related to the effects of COVID-19, it should be noted that they accept the workers brought by the labor contractors and make them work the same working hours and pay them the same wages as an entire group, even if workers below 16 years old are among these groups. • Young workers are working more than 40 hours a week. This is above the permitted legal limits. • Few young workers were noticed and reported to bend big branches and carry hazelnut filled sacks, which are about 35 kgs. | <p>Olam has been fighting against child labor for a long time. Despite the efforts in the field, it was observed that some farmers and workers are not fully informed about consequences of child labor and special measures for young workers.</p> <ul style="list-style-type: none"> • As COVID-19 seems to continue in the next harvest period, field mapping will be completed earlier this year. Convenient places for summer schools and safe spaces within the walking distance of the workers will be determined to prevent child labor within the scope of COVID-19 measures. Children on the football field (sports-based camp) project, summer schools and safe spaces will be continued in terms of the convenient location approved by the local authorities. Besides the provincial level of the Ministry of National Education, district levels of MoNE will also be visited by Olam staff and mutual decisions will be taken until July 2021 in Sakarya and Duzce provinces. Participation of at least 100 children will be ensured. • Educational kits including story book, coloring book, crayons and games will be distributed to 200 children staying at home with the cook in Sakarya and Duzce provinces to support their cognitive and academic development. These kits will also encourage the children to stay away from the hazelnut gardens for the cases in which they prefer to work with their family members due to lack of available child-friendly equipment keeping them busy in the worker shelter. • Olam’s current CLMRS will be strengthened through new modules and digitalization of the data records obtained by social training and internal audits. This will enable the staff to track internal audits and follow-up actions effectively, take |

further actions against non-compliances with child labor policy on regular basis in the field before the deadlines set by the system.

- **Child Labor Focal Points will be appointed in every village** by Olam social workers. They will be chosen among community members; e.g., mukhtar, grocery store owner, leader farmer. Every **Social Worker will provide trainings for the Child Labor Focal Points** with whom they will coordinate the child monitoring situation at the community level in the villages. **Child Labor Focal Points will keep Olam social workers informed when they observe child labor or non-conformity with young labor conditions in the village. They will also disseminate knowledge about working conditions for young workers at the local level.** They will be specifically trained on minimum age for young workers, age verification for young workers, legal limits of the working hours for young workers and legally permitted activities carried out by the young workers in the hazelnut farms. While Olam social workers put emphasis on such issues in their social trainings conducted with farmers, Child Labor Focal Points will also be fully informed and two-sided flow of information will be ensured in the villages. In this way, Olam aims to increase the level of efficiency of the messages given to the farmers on age verification, working hours and working conditions for the young workers.
- Additional steps will be taken within the framework of 2021 plans. Following the observation of child labor in the field, remediation action plan will be taken within 48 hours and children will be referred to safe spaces and summer schools. In one-week, social worker will monitor the situation in coordination with the Child Labor Focal Point assigned in the region. Throughout the harvest period, the same monitoring system will be ensured once a week. In every crop year, at least one internal monitoring will be conducted for each sustainability farmer. Farmers engaged with CL, farmers explicitly claiming CL and farmers with young workers exceeding 40 working hours per week will be prioritized among the ones internally monitored.
- **Wage receipt template drafted by Olam staff** showed only daily working hours as it was signed by workers, farmers and labor contractors after the worker finishes the job. It has been **revised to show**

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| | <p>daily and weekly working hours. In this way, if working hours exceed 40 hours per week for young workers, it will be evincible.</p> <ul style="list-style-type: none"> • Olam staff was registering the young workers into their internal system through a young worker registration form where only daily working hours are kept and signed by the parents. It has been revised by adding sections to show that daily working hours of the young workers are registered. New forms will be distributed in the next harvest period. • Additionally, 10% of the farmers recruiting workers will be chosen as samples in Akcakoca and Karasu districts. Their labor contractors and young workers will be contacted by Olam Social Workers every day during the harvest period to control working conditions and working hours of the young workers; necessary actions will be taken accordingly. In this way, if occurred, non-compliance against working hours and conditions of the young workers will be prevented and corrective actions will be immediately taken prior to the end of the harvest period. • Olam will continue to distribute notebooks to the farmers recruiting young workers. While distributing, the importance of those notebooks will be detailed by Olam social workers as they can keep the records relevant to young workers there. As mentioned above, the delivery process was delayed by the printing agency in the 2020 harvest period. Advance planning has already been made to avoid the delay in the upcoming harvest period. • Awareness raising activities will be carried out on child rights and young workers (minimum age, working hours, working conditions, etc.) for farmers recruiting local and seasonal migrant workers. Activities will not only involve social training but also relevant social media content shared through Olam social media channels. Informative posters on legislation showing child labor, age verification of workers, working conditions for young workers will be put in the village squares before and during the harvest period. Relevant SMS messages will also be sent to the farmers in the supply chain. <ul style="list-style-type: none"> - 580 SMS on child and young workers will be sent to 580 farmers in Akcakoca and Karasu districts. |
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| | <ul style="list-style-type: none"> - Informative posters on child labor and the young worker working conditions will be put in place in Akcakoca and Karasu districts. - 580 farmers will be trained on age verification, working conditions for young workers and working hours for young workers. - Relevant video and photos will be shared through Olam’s social media accounts. <p>Responsible staff: Arif Fidan, Sema Yilmaz (Social Workers).</p> |
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HEALTH, SAFETY AND ENVIRONMENT

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| <ul style="list-style-type: none"> • Workers at six visited producers reported that they are transported in tractor trailers together with hazelnut sacks, side by side as 10-15 workers on the same vehicle. • Toilets are not available on all gardens especially on gardens far from accommodation places. This is a challenge for workers, especially for female workers. | <ul style="list-style-type: none"> • In social training conducted by Olam social workers, transportation rules are explained when occupational health and safety standards are conveyed. However, it has been observed that farmers and workers tend to continue their old habits about tractor trailers. Since they have been using this transportation system for a long time, Olam staff observed that current training modules are not as effective as expected. To make it more effective, information on penalties included in the Occupational Health and Safety Law will be highlighted during the training. Additionally, visuals and details of previous accidents will be shared to make a stronger impression. • In addition to existing info sharing on hygiene and COVID-19 measures in the field through posters and trainings, SMSs will be sent to both farmers and workers on necessity to wear masks and keep the social distance during the entire harvest period including intercity journey, trips between worker shelter and hazelnut farm, and work in the hazelnut farm. • Regarding the mobile WC and shower issue, Olam has been distributing such equipment since 2017 and guiding farmers to install simple mobile WCs in the hazelnut farms emphasizing difficulties particularly experienced by the female workers during the harvest period. During the 2020 harvest period, Olam has implemented Women on the Roads for Hazelnut project. One of the outcomes was the lack of sanitation facilities underlined by female workers during the COVID-19 pandemic. |
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| | <p>Considering project outcomes and field observations, Olam staff decided to increase the number of Mobile WC and showers in the hazelnut farms and worker shelters. 15 Mobile WC and showers will be distributed in Akcakoca and Karasu districts in the 2021 harvest period. Furthermore, special emphasis will be put on the right to access clean water and sanitation facilities while Olam social workers conduct training and meetings with the farmers in the supply chain.</p> <ul style="list-style-type: none">• In line with these targets, it is planned to reach 580 farmers and their worker groups in Akcakoca and Karasu districts. <p>Responsible staff: Gulbeyaz Cinar, Sema Yilmaz (Social Workers).</p> |
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