



## COVID-19 FOCUSED REPORT OF SABIRLAR HAZELNUT SUPPLY CHAIN IN TURKEY – 2020

### Introduction and Assessment Objectives

In 2020, in addition to the standard Fair Labor Association (FLA) assessments, the FLA collected information about the impacts 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.

Even under the restricted access and movement, the FLA maintained independence through the use of local assessors. The FLA accredited assessors (Asya Control Certifications & Consultancy) were able to collect information independently from growers, workers, the Sabırlar management and field staff in the villages of Gölcügez, Kaledibi and Tekkiraz in Ordu province. Findings presented in this report was supplemented by information collected by the FLA assessors from Ünye District Directorate of Health, Gölcügez Village Muhtar, Ünye Chamber of Agriculture under scope of civil society organization (CSO) interviews.

An internal management systems (IMS) evaluation and documentation review of Sabırlar's Fair Labor Program (FLP) was undertaken as well in 2020. The FLA focused on interventions taken by Sabırlar 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 17 to 20 August 2020 in Sabırlar'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



**Workers Receiving Kits Distributed by Sabırlar After Training**

presents the findings of Sabırlar's Internal Monitoring System review, results of the worker, grower and stakeholder interviews. The final chapter provides an overview of the main findings against FLA Agriculture Code benchmarks.

## I. Data Collection

Two assessors (A.Kadir Tasdelen and Tugba Ocek) from Asya Control Certifications & Consultancy collected both field level and internal management level data between 17 August and 20 August.

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

For field level data collection, assessors:

- Interviewed face to face a total of 12 adult male growers supplying hazelnut to the company. The FLA gave the monitors a list of 30 growers in the villages of Gölcüğe, Kaledibi and Tekkiraz. Eight growers from Gölcüğe village, three growers in Kaledibi village and one grower in Tekkiraz village were visited.
- Visited 12 worker groups working for the interviewed growers. Nine groups were seasonal migrant workers from Sanliurfa, Batman and Gaziantep working on gardens and three groups were consisting of growers' family members from Istanbul.
- The monitor interviewed in total 65 workers out of these groups one by one or in small groups considering the COVID-19 measures.
- Conducted online and face to face meetings with Ünye District Directorate of Health, Gölcüğe Village Muhtar, Ünye Chamber of Agriculture under scope of civil society organization (CSO) interviews.

## II. COVID-19 Related Country Background

Turkey was a country with low risk of COVID-19 (as of mid-late July) where partial field-visits could be undertaken by FLA designated assessors. It is reported that growers experienced some hardships in the pre-harvest season. When COVID-19 restrictions started being implemented it was sowing season and growers had difficulties tending to their gardens. Ünye Chamber of Agriculture contacted the Governorship to allow growers to work at their gardens and they succeeded in receiving required permissions. It is understood that the government has tried to make it easy for the agricultural work to be completed without too much damage and loss for all parties involved.

The agricultural fieldwork continued as usual and as if the pandemic had not occurred during the Harvest period. Only in a limited number of cases, the growers could not find local workers to work with in the harvest since surrounding villages were under quarantine. Otherwise, the assessors observed that growers 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 growers and workers. Lockdown measures were covering closure of social places such as shopping malls, shops, mosques and limitation of travel between cities. Similar to 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 number of workers accommodating in units, providing 15-40 liter/day/worker water supply, planting minimum one toilet and tab for ten workers and one shower for 30 workers, locating toilets with a specific distance to accommodation units, identifying one representative of the group for shopping duties.

### III. 2020 COVID-19 Assessment Findings

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

Sabırlar joined the FLA in 2019 and has been taking steady steps to improve her program.

A total of four main areas 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. Room for improvement detected for these areas are presented below:

FLA Principles and Company Actions on COVID-19	
<b>AWARENESS BUILDING AND TRAINING IN SUPPLY CHAIN AND OTHER MITIGATION EFFORTS</b>	
	<p>The company has set up a WhatsApp group with all growers during COVID-19. They have shared informative communications through this group, including subjects about COVID-19. The company has prepared training material including videos and communicated these via WhatsApp to growers as well.</p> <p>The company continued training workers on the field after the restrictions were lifted. The District Directorate of Health has a joint project with Sabırlar Fındık about increasing awareness of growers and assisting them with COVID-19. Under the scope of the project, they organized training for growers and workers about COVID-19, distributed masks and disinfectants, personal hygiene stuff, and socks for children.</p>
<p>Training covered how COVID-19 can infect the workers and growers, methods of protection, information about general internal and external parasites, KETEM and personal hygiene,</p>	

principle of not shaking hands with anyone and not accepting treats. As far as possible, the training was conducted one-on-one and with family heads.

### FACILITATING ACCESS TO GRIEVANCE MECHANISMS

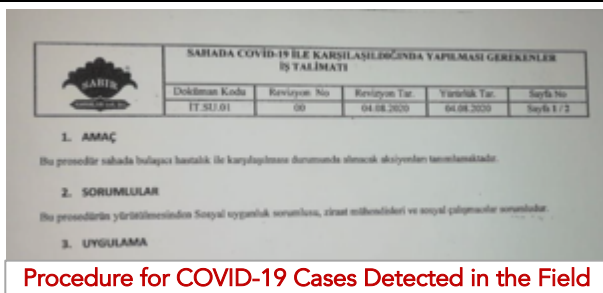
The company has implemented a grievance system in line with their grievance procedure. They have trained their own staff, growers, intermediaries, labor contractors and workers about the system.

The company has defined grievance collection as one of its social workers' responsibilities. These workers collect the grievances during garden visits and internal monitoring. They communicate their hotline on their posters, brochures, and internet web site. The company has prepared a detailed list of important contacts of official authorities and CSOs for each FLA code separately in their grievance procedure. The company is aiming to assist the workers, growers, or related parties to easily access the contact person they could need to contact regarding their grievances.

The company reports that they have not received any grievances from workers or growers regarding workplace conditions and workers' rights. The FLA suggests that the company should study the reason behind the fact that no grievances are received.

### MONITORING AND DATA MANAGEMENT

The company has started with their monitoring after the restrictions were lifted and harvest has started. The company had visited five growers on the date the IMS monitoring took place. The plan was to visit minimum 15 growers to 20 growers. This is equal to 33 % of planned minimum growers to be monitored.



The company has added risk of infectious diseases to their risk analysis after the break of COVID-19. They also have prepared instructions for their staff as actions to be taken when COVID-19 case is detected.

FLA recommends that the company should continue following up pandemic related indicators and add COVID-19 component to their internal monitoring procedures and report, specifically the measures to be taken in case of infectious diseases

### REMEDICATION and ACCESS TO PUBLIC SERVICES

The company has started monitoring COVID-19 related implementations on the field. They were reporting the gaps and were working on remediations. They had started and

continued distributing packs of masks, disinfectants, hygiene stuff and gloves to growers and workers during the assessments

**b. Interview Workers, Growers and Stakeholders**



Interviewed representatives of Ünye District Directorate of Health, Ünye Chamber of Commerce and The Muhtar (head) of the Gölcüğe Village indicate that from a region wide perspective, one major change occurred in the worker profile. International migrant workers from Georgia who used to be an important number of the workforce could not travel to the region for 2020 Harvest due to border closures. The Muhtar reported that one Georgian family had contacted the grower they

worked with in past years regarding a permit to travel to Turkey for 2020 Harvest. However, the grower had refused to help because the formalities were very exhausting and according to the rules, the grower had to accept full responsibility for the health and safety of these workers.

It is also reported that a group of the locals who migrated to big cities in the past and have lost their jobs or had to take a break during COVID-19 pandemic returned to the region with their family (children included as schools were closed) to help their family or relatives. Some of them found paid harvest work in other people’s gardens. The size of this group and their possible impact on the worker profile is unknown. However, it should be noted that returning to the region for the Harvest is a habit among family members who reside in big cities. They used to arrange their annual leaves to the harvest season and harvest their crop in the past as well.

Apart from these changes, stakeholders report that the number and origin of workers working in the Harvest remain mostly the same. Seasonal migratory workers from Southeastern of Turkey are still the largest portion of the harvest work force in the region in 2020. These workers arrive in the region in groups of families and relatives. There are sporadically Syrian workers arriving among these groups.

Within the framework of this assessment, the monitors detected no major change in the worker profile of the interviewed 12 growers compared to previous years:

- One grower reported he employed more migrant workers this year as employing local workers was difficult due to COVID-19 restrictions. He also said that the number of available local workers has decreased over the past years.
- Another grower reported that he employed more local workers.

Interviews with the workers employed in 12 growers’ gardens demonstrate that mostly seasonal migratory workers were employed for the harvest, in the line with the regional preferences. Nine growers employed seasonal migratory workers from Sanliurfa, Batman and Gaziantep and three growers solely harvested with family labor and their family members from Istanbul.

	Number	Percentage
Local Worker	10	15%
Seasonal Migrant Worker	55	85%

Overall, it is observed that male workers outnumbered female workers among the interviewed workers.

	Number	Percentage
Female	24	37%
Male	41	63%

In total, seven interviewed workers are aged below 18 years old in the interviewed groups:

- Except one family worker, all other female workers are seasonal migratory workers.
- Four of them are male in total.
- Their ages vary—assessors came across 15 years old (one person) and 17 years old (six persons) workers.
- According to 78% of the interviewed workers, there is no change in the number of young workers this year due to COVID-19. All state that they did not come across child labor in 2020.

	Number	Percentage
Below 18 y.o.	7	11%
18-29 y.o.	40	61%
30-39 y.o.	3	5%
40-49 y.o.	9	14%
50-59 y.o.	2	3%
60 y.o. and above	4	6%

Overall, all workers’ lives have been impacted by COVID-19 in one way or another:

- Seven workers had one or multiple family members infected with COVID-19.
- Those below 20 years old could not go out due to restrictions, students could not attend

their schools.

- 20% of the workers are working longer hours now and 15% feel that they are not protected enough in their workplaces.
- For 40%, the pandemic meant increased care for children which added to the physical and psychological toll of COVID-19.
- Household costs (particularly food) increased, and incomes were negatively affected. 40% claimed that one or more family members either lost their job or had their salary reduced during the pandemic. 74% had a reduction in their own income.
- 12% started to receive Government pandemic support worth 1,000TL to deal with the effects of the pandemic on their households.

### Recruitment Process of Workers (including migrant workers)

All started to work in the farms in August undertaking harvest related tasks. 70% worked for the first time with the farmers who employed them in 2020.

80% of the workers claimed that they had no difficulties in getting employment this year due to COVID-19. For the remaining 20%, it should be noted that 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.

According to traditional recruitment practices, local workers mainly contact farmers directly, or the farmer knows them and hires them in directly. Small portion of local workers are recruited through intermediaries. The intermediaries might deduct 1-2 TL from daily wages of local workers.

Agricultural intermediaries are 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 are required to 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 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 growers and workers state that working conditions have not been affected by COVID-19. According to growers, the worker groups were working their usual hours:

- Four growers reported that they work from 8 am to 6 pm and have a one-hour lunch break and two 15-minute breaks.
- Seven growers reported they work from 7 am to 6 pm and have a one-hour lunch break and two 15-minute breaks.
- One grower reported that they work 7 am to 5 pm and have a one-hour lunch break and two 15-minute breaks.

COVID-19 did not cause any change on the compensation side either. The growers are paying the workers the daily wage announced by the governorship which is 100 TL including the meals (110TL excluding the meals). There was one labor contractor of migrant workers group who deducted 10 % as his intermediary commission. None of the workers claimed to be asked to

accept salary deductions, pay deductions, wage givebacks, or any other measure or deduction during the COVID-19. However, 31% stated that their contract does not entitle them to receive benefits such as sick leaves and they could not take leave without deductions if they had to. 42% were not sure if they were entitled to such benefits. It is seen that a considerable number of workers are confused about what would happen if they were to become sick. It should be added that growers and the labor contractor claim to inform workers about this issue at the beginning of the harvest; sick workers would be replaced by another worker in such cases and they would be taken to hospital.

77% claimed to have access to grievance channels to provide feedback or raise questions around the adjustments to working arrangements needed due to COVID-19 but none used these channels. According to growers and the labor contractor, workers prefer to resolve their problems face-to-face, with the help of supervisors and labor contractors.

### COVID-19 Measures at Workplaces and Points of Accommodation



**Sabirlar Agronomist Training Video**

Overall, all workers feel that the employer has taken adequate measures to protect them from being infected by COVID-19 at the workplace. None of the workers is aware that any other workers at the farm have become ill with COVID-19.

82% said that they participated in COVID-19 training that covered key

topics such as additional PPE, proper distancing and guidance on how to achieve proper distancing during work. Workers employed in two farms were not sure if their training included additional cleaning and sanitization of work tools and areas or not.

It should be noted that in 2020, Sabirlar provided training to workers with the District Health Directorate and training was ongoing during the FLA's field visits. Growers did not give any extra training when employing workers; they mainly emphasized that workers should follow the announcements of the ministry.

Only 12% feel that they are able to maintain a proper distance at their workplaces. On this subject, the labor contractors and supervisors emphasize that they assigned families who live in the same house to work in the same garden.

Per workers' accounts, all growers provided additional COVID-19 related PPE and replacement PPE sufficiently available according to all workers. All interviewed parties contacted within the scope of CSO interviews accentuated that personal hygiene and PPE usage were key issues for

workers during the pandemic. It is seen that stakeholder efforts targeting workers centered around distribution of PPE and hygiene kits.

According to workers, some growers made additional adjustments to mitigate risks related to COVID-19 such as:

- Worker transportation to maintain distancing of workers (eight growers – remaining four growers did not provide transportation as their gardens were close to points of accommodation).
- Housing to maintain distancing and isolate the sick workers (three growers – remaining growers differ, reporting that they provided their vacant rooms, buildings for workers and made space for potential cases that would require isolation).
- Identified workers who are more vulnerable to COVID-19 risks and made special adjustments (three growers – growers indicate that there were no vulnerable workers, such as elders, pregnant women or chronic ill in the worker groups. It should be noted that five growers made their assessment either by judging them by their appearances or directly asking).

#### IV. Farm Level Workplace Standards Evaluation

COVID-19 brought some changes such as COVID-19 specific training and adjustments to mitigate infection risks in the Sabırlar supply chain. Aside from them, growers’ and workers’ usual practices, routines and working conditions remained the same during the 2020 harvest.

SUMMARY OF FLA IEM FINDINGS	SUMMARY OF COMPANY COMMITMENTS (Corrective Action Plan)
<b>WORKER PROFILE</b>	
<ul style="list-style-type: none"> <li>• The company collected workers’ profiles and their working hours through their Workers Registry Form. They are also implementing an agreement for seasonal agricultural workers. <b>However, it is observed that the workers are not aware of the agreement and its bound conditions.</b> The workers still refer to their verbal agreement made with the labor contractor or the grower.</li> </ul>	<ul style="list-style-type: none"> <li>• Online awareness-raising training will be organized for workers in Şanlıurfa and Batman province between February and March. It is aimed to reach at least 20 houses in the cities of origin.</li> <li>• In addition, informative training will be held in Unye district of Ordu province in August for 300 workers.</li> </ul>

## HOURS OF WORK AND COMPENSATION

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| <ul style="list-style-type: none"> <li>• Although it is not related to the impact of COVID-19, the monitors were informed during interviews with workers and growers that the total daily working hour is varying between 8.5 and 9.5 hours. Considering that work on a garden of growers could take more than five days and these workers would start working for another grower when having finished harvest at one grower these workers would be <b>working consecutive 20-30 days, which means exceeding the legal maximum 45 hours a week working limit.</b></li> <li>• This was the <b>same case for young workers.</b> The Young workers were working the same working hours as adult workers. The monitors detected seven workers of 15 and 17 years of age, who were exceeding both the weekly maximum 40 hours and daily maximum eight-hour legal working limits.</li> </ul> | <ul style="list-style-type: none"> <li>• Key actors, labor contractors will be contacted in January or February through training organized in the cities of origin by FLA and Pikolo within the framework of Harvesting the Future Project. It is aimed to reach ten labor contractors in Şanlıurfa and Diyarbakır and organize training that will cover mentioned issues. In addition, Sabırlar will reach nine labor contractors that they have certified before, by phone or online between February and March.</li> <li>• Also, a monitoring and tracking system will be established to find out how many days the workers have worked in the project farms belonging to Sabırlar and whose garden they go to work after their work is finished there. Workers who come to the gardens of at least five farmers will be reached and these workers will be inspected in this way. Based on the results, discussions will be held with mukhtars on what to do to spread the positive impact on other farmers.</li> </ul> |
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## HEALTH, SAFETY AND ENVIRONMENT

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| <ul style="list-style-type: none"> <li>• Access to sanitation needs to be improved. The monitors report that workers use toilets and drink water from growers' houses or at farmhouses but <b>access to sanitation</b> is a point of improvement in the gardens, <b>especially for women.</b></li> <li>• The company and growers have distributed masks and gloves to workers, but workers are wearing these just in the monitors' presence. Workers feel uncomfortable, especially when</li> </ul> | <ul style="list-style-type: none"> <li>• Two mobile toilets will be placed near people who employ a lot of workers and have large land, in two different villages in Ünye district in July. Pre-harvest studies will be carried out for areas accessible to more people and infrastructure works will be initiated.</li> <li>• 100 free hygiene kits will be distributed to the workers that will be reached in Şanlıurfa and Batman in February and March.</li> </ul> |
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working with the mask on. **The awareness of continuously wearing the PPE** is low.

- 200 free hygiene kits will be distributed to the workers that will be reached in Unye district in August.
- In addition, the number of hands washing units provided in the last harvest will be increased. 30 hand washing units and liquid soap will be provided to the farmers for use in the garden.
- Hygiene training will be carried out within the framework of "Healthy Life for Seasonal Agricultural Workers" project with the support of the District Health Directorate to increase PPE awareness. It is planned to provide these trainings for all seasonal agricultural workers in at least eight villages in Ünye district.
- A tracking system will be established for PPE. PPE distribution and usage rates will be followed.
- A complaint and suggestion mechanism system will be used to support workers' free access to masks. It will provide information to workers about this mechanism and access to free masks.