



**FAIR LABOR**  
ASSOCIATION®

## EXECUTIVE SUMMARY

# INDEPENDENT EXTERNAL ASSESSMENT OF SYNGENTA'S SEEDS SUPPLY CHAIN IN EUROPE: 2018

## Introduction

The Fair Labor Association's (FLA) Principles of Fair Labor and Responsible Sourcing for the agriculture sector<sup>1</sup> require that the farms in the supply chains of each Participating Company are subject to FLA's annual Independent External Assessments (IEA).

Syngenta Seeds has been affiliated with the FLA since 2008 and executes its Fair Labor Program (FLP) in its hybrid seeds supply chain globally<sup>2</sup>. The FLP assesses labor practices on farms against the Syngenta Code of Conduct<sup>3</sup>.



**Workers During Their Rest Time (Izmir, Turkey)**

As a Participating Company, Syngenta has committed to meeting the FLA Workplace Code of Conduct for the agriculture sector<sup>4</sup> in its seeds supply chain globally and develop corrective action plans (CAP) for identified non-compliances. Each year, the FLA conducts about 20 field-level assessments<sup>5</sup> covering a large number of farms in various countries for Syngenta<sup>6</sup>. For the 2018 assessment cycle to assess the working conditions at the farms, the FLA conducted two unannounced independent external monitoring (IEM) visits – one each in Hungary and Turkey. Both visits took place in July 2018, during the corn detasseling activity.

Independent FLA accredited assessors<sup>7</sup> visited 4 farms in Hungary in Békés and Jász-Nagykun-Szolnok, and 12 farms in Turkey located in Izmir and Bergama. A total of 199 workers involved in detasseling activities were interviewed during the assessment visits (39 workers in Hungary and 160 workers in Turkey). A diverse group of workers including adult workers, women, and young workers were interviewed.

<sup>1</sup> FLA's Principles of Fair Labor and Responsible Sourcing are closely aligned with the United Nations Guiding Principles on Business and Human Rights (UNGP) and the OECD-FAO Guideline for Multinational with Agricultural Supply Chains. FLA Principles are available [here](#).

<sup>2</sup> By 2019, Syngenta's Fair Labor Program covered 99.3 percent of all its seed supply farms globally, representing 29 of 33 seed-producing countries where Syngenta procured seeds from. Find more information [here](#)

<sup>3</sup> <https://syngenta.pid1-e1.investis.com/sites/syngenta/files/code-of-conduct/download-our-code-of-conduct/syn-cofc-english-2019-v1-lr.pdf>

<sup>4</sup> [https://www.fairlabor.org/sites/default/files/fla\\_agriculture\\_code\\_of\\_conduct\\_and\\_benchmarks\\_october\\_2015.pdf](https://www.fairlabor.org/sites/default/files/fla_agriculture_code_of_conduct_and_benchmarks_october_2015.pdf)

<sup>5</sup> The FLA conducts five types of assessments depending on the maturity of a company's work place labor compliance program in a given country and commodity. These include, 1. Baseline Mapping, 2. Independent External Monitoring (IEM), 3. Independent External Verification (IEV), 4. Focused Assessment, and 5. Social Impact Assessment (SIA).

<sup>6</sup> More FLA reports can be found here <https://www.fairlabor.org/affiliate/syngenta>

<sup>7</sup> <https://www.fairlabor.org/transparency/fla-accredited-monitoring-organizations>

In Hungary, the permanent workers involved in the detasseling activity are directly recruited by the farmers/farming companies from the local or nearby towns and villages. Seasonal workers are usually recruited through labor contractors<sup>8</sup>. In Turkey, workers are usually recruited for detasseling by an intermediary recruitment agency (with a direct contract with Syngenta) that recruits seasonal workers through local labor contractors.

The assessment teams followed the FLA’s Independent External Assessment methodology, which comprises four main components: (1) visits to Syngenta’s local offices, (2) visits to supply chain intermediaries like seed organizers, labor contractors, or recruitment agency, (3) farm visits, and (4) external stakeholder consultations. This report summarizes the FLA’s findings for its 2018 assessments in Hungary and Turkey and Syngenta’s corrective action plan for the findings. Detailed reports are available [here](#).

### 2018 Assessment Cycle Findings: Hungary

SUMMARY OF FLA FINDINGS	SUMMARY OF SYNGENTA’S COMMITMENTS (Corrective Action Plan)
<b>EMPLOYMENT RELATIONSHIP</b>	
<ul style="list-style-type: none"> <li>Assessors noted that in the farms where seasonal workers are hired through a labor contracting companies, the level of compliance depends on the approach and practices of the labor contractor. Most labor contractors fail to maintain any written documents such as terms and conditions of employment and other documents required for workers.</li> </ul>	<p>Syngenta will</p> <ul style="list-style-type: none"> <li>Work with the growers to identify the labor contractors in spring before the detasseling season to train them, and ensure that all necessary documentation and systems are in place for the labor contractors to improve their human resource management (HRM) System.</li> <li>Work in cooperation with two different FLP subcontractors (health and safety, employment and psychological experience) and create a new campaign for seasonal workers to increase their awareness.</li> <li>Develop new training materials, including boards with visuals and information to develop workers' interest in cooperating with FLP subcontractors.</li> </ul>
<ul style="list-style-type: none"> <li>Based on the interviews with seasonal workers and farm walkthroughs, assessors could not gather proof that the labor contractor check the identity cards of the young workers for age verification.</li> </ul>	<p>Syngenta will:</p> <ul style="list-style-type: none"> <li>Extend the health and safety work rules to young workers, and reform the training materials and information boards experience to inform young workers about the rules for all employees.</li> <li>Provide training to labor contractors to highlight the rules for protected workers, along with all the necessary documentation for employees.</li> </ul>

<sup>8</sup> The agent for E-category Farms also hires their seasonal workers through a labor contractor.

	<ul style="list-style-type: none"> <li>• Provide growers and subcontractors bracelets to identify young workers and the appropriate documentation for managers to check proof of age in the fields.</li> <li>• The foreman responsible for de-tasseling in the fields will assist Syngenta agronomists for monitoring and will be trained on rules of protected workers and age verification so that they can carry out this work in the fields.</li> </ul>
<ul style="list-style-type: none"> <li>• Disciplinary measures, written policies and rules are available at farm only for the permanent employees. Seasonal workers are hired by labor contractors and not legally employed by the farmers. Labor Contractors have no written disciplinary rules and practices in place and they reported not receiving any from either Syngenta, or the farmers.</li> <li>• Assessed labor contractors did not receive any training or information from Syngenta or the farmers on disciplinary measures this year.</li> </ul>	<ul style="list-style-type: none"> <li>• Syngenta will create a disciplinary procedure for the farm level for season workers, and update the rules and documentation concerning disciplinary procedures and will continuously popularize these in all forums (grower meetings, website, training materials, in the new campaign for the seasonal workers).</li> </ul>
<b>HEALTH, SAFETY, &amp; ENVIRONMENT</b>	
<ul style="list-style-type: none"> <li>• Syngenta informed the assessors that they provide the farmers with first-aid kits. All assessed farms had the first aid kits in easily accessible places. In two farms the assessors found that some of the first aid kit products were expired.</li> </ul>	<ul style="list-style-type: none"> <li>• Syngenta agronomists will collect the first aid kits from the grower one month before the beginning the de-tasseling season and check the validity of all the products in the kits. After checking, the responsible agronomist will restock the first aid kits with validated equipment.</li> </ul>
<ul style="list-style-type: none"> <li>• Most farms have sanitation facilities for seasonal workers. In one farm there were no toilet available to the workers and no clean water.</li> </ul>	<ul style="list-style-type: none"> <li>• During peak season, Syngenta will rent several mobile sanitation facilities (toilet) for seasonal workers with regular cleaning, maintenance, and shipment field-by-field.</li> <li>• Usually, clean drinking water is ensured in the farms by workers. Syngenta will remind growers, subcontractors, and seasonal workers of the drinking water requirement and the adequate HSE rules for sanitation access at all forums from</li> </ul>

	<p>the previous year and make sure that the workers have access to clean water.</p>
<p><b>HOURS OF WORK</b></p>	
<ul style="list-style-type: none"> <li>• Most assessed farms record working hours. At two assessed farms the attendance sheets are not validated by seasonal workers.</li> <li>• At one of the assessed farms assessors could not check the attendance sheet due to the labor contractor's unavailability.</li> </ul>	<ul style="list-style-type: none"> <li>• Syngenta will improve the attendance sheet according to the validated employee rules, highlighting the hours of work. This will be mentioned in all forums.</li> <li>• Syngenta staff will check the correct completion of the attendance sheets and the number of hours recorded.</li> </ul>
<p><b>COMPENSATION</b></p>	
<ul style="list-style-type: none"> <li>• At two farms documentation related to social security contributions to the tax authorities for seasonal workers were not available. Assessors also could not establish if the labor contractors have registered the workers are the National Tax Authority and pay the taxes in a timely manner or are working with them without proper authorization.</li> </ul>	<ul style="list-style-type: none"> <li>• Syngenta will launch a new awareness campaign for seasonal workers, growers, and labor contractors to increase their awareness on the legal requirements and roles and responsibilities and update all the materials to be distributed to them with updated information.</li> </ul>
<ul style="list-style-type: none"> <li>• Some of the assessed labor contractors do not provide seasonal workers with a countersigned salary slip (pay statement).</li> <li>• Wage records are not maintained by labor contractors at the assessed corn farms.</li> </ul>	<ul style="list-style-type: none"> <li>• Syngenta provides growers and subcontractors with an attendance sheet where the hours worked and overtime for seasonal workers can be recorded. Syngenta foremen will check the correct completion of the attendance sheets and maintain the hours worked.</li> </ul>

## 2018 Assessment Cycle Findings: Turkey

SUMMARY OF FLA IEM FINDINGS	SUMMARY OF COMPANIES' COMMITMENTS (Corrective Action Plans)
<b>EMPLOYMENT RELATIONSHIP</b>	
<ul style="list-style-type: none"> <li>Only one labor contractor out of the five interviewed had an official ISKUR licence ( the local office of Ministry of Family and Labor, Social Security that issue a legal registration). As a result, 80 per cent of the labor contractors working with the recruitment agency had no license that authorizes them to act as labor contractors.</li> </ul>	<ul style="list-style-type: none"> <li>Syngenta and the recruitment agency's (Yaklaşım Tarım) procedures include a bonus system for labor contractors who have an ISKUR certificate. The aim is to encourage the labor contracts to obtain this certificate. Syngenta will engage with ISKUR for the training of labor contractors before the season starts in 2019 to obtain the license from ISKUR.</li> </ul>
<ul style="list-style-type: none"> <li>When farmers hire workers directly for non-detassling work, they do undertake an age verification process.</li> <li>The recruitment agency manages the employment of seasonal workers based on work that lasts approximately 30 days. Some workers may continue to work in drying and logistics, leading to a risk of noncompliance regarding continuous work under short-term work contracts.</li> <li>Workers recruited through the recruitment agency for peak activity tasks do not pay any recruitment fee. However, when the same workers are recruited by farmers directly to handle other tasks, the labor contractors deduct their 10 percent commission directly from the workers' wages. Worker in this case end up getting less than the legal minimum wage.</li> </ul>	<ul style="list-style-type: none"> <li>Syngenta code is available in the contracts that are signed with the farmers. This system will continue. Related legal requirements will be re-assessed before the new campaign in 2019.</li> <li>Syngenta will ensure that farmers who receive trainings on labor standards disseminate the information to the workers.</li> <li><i>Syngenta did not provide CAP regarding employment of seasonal workers under short term work contract and direct recruitment of seasonal migrant workers by farmers.</i></li> </ul>
<ul style="list-style-type: none"> <li>Syngenta and the recruitment agency do not communicate working conditions to workers hired by farmers directly.</li> <li>Farmers (or labor contractors) make verbal agreements with workers but there is no system in place to ensure that all workers employed by farmers receive communication on workplace rules and conditions of employment.</li> </ul>	<ul style="list-style-type: none"> <li>Syngenta code and benchmarks are available in the contracts that are signed with farmers. This system will continue.</li> <li><i>Syngenta did not provide CAP regarding communicating working conditions to workers directly hired by farmers.</i></li> </ul>

<ul style="list-style-type: none"> <li>• Syngenta’s disciplinary system does not include an appeal process when the company, recruitment agency, or the farmers take any disciplinary measures towards workers.</li> </ul>	<ul style="list-style-type: none"> <li>• Disciplinary procedures will be written, and these procedures will be attached to contracts that are signed by the farmer.</li> </ul>
<ul style="list-style-type: none"> <li>• Syngenta provides training to farmers during the contracting period and invites family members of farmers to attend these trainings. In practice, no family member participates in the trainings even though they are involved in farm activities. The main reason for this may be the location of the training at the village coffee house, where family members are not comfortable going.</li> </ul>	<ul style="list-style-type: none"> <li>• Syngenta will use village public schools to conduct trainings for family members of farmers.</li> </ul>
<b>NON-DISCRIMINATION</b>	
<ul style="list-style-type: none"> <li>• The recruitment agency bases their recruitment decisions on non-discriminative practices. However, speaking and reading the Turkish language has unknowingly become a determinant for decision of employment putting other ethnic groups at risk of non-receiving employment.</li> </ul>	<ul style="list-style-type: none"> <li>• At the beginning of the field activities, Syngenta will hold a meeting with Yaklaşım Tarım to understand the profile and availability of the labor force in the region. All documents will be translated into the language of other ethnic groups in the area to facilitate their understanding of the terms and conditions, and ability to secure employment.</li> </ul>
<b>HEALTH, SAFETY &amp; ENVIRONMENT</b>	
<ul style="list-style-type: none"> <li>• Two farmers out of 12 possessed a legally required and valid crop protection application certificate. Syngenta reported that the farmers face difficulties participating in the authorities' trainings, because these are mainly held during peak season periods.</li> </ul>	<ul style="list-style-type: none"> <li>• Syngenta will hold meetings with the Agricultural Provincial Directorate for safe chemical management handling certificate training for farmers.</li> </ul>
<ul style="list-style-type: none"> <li>• The first aid kits were basic and some of the supplies had expired.</li> </ul>	<ul style="list-style-type: none"> <li>• Syngenta will and maintained new first aid kits in the new season. Contents of first aid kits will be reviewed on a continuous basis.</li> </ul>
<ul style="list-style-type: none"> <li>• A group of 15 workers had not yet received their PPE due to a late delivery.</li> </ul>	<ul style="list-style-type: none"> <li>• Purchase order will be created earlier for all PPEs and the related meetings will be held with the supplier.</li> </ul>
<ul style="list-style-type: none"> <li>• There are no policies and procedures in place to ensure female workers are not engaged in activities that could be harmful for their reproductive health.</li> </ul>	<ul style="list-style-type: none"> <li>• There is no exposure of female workers to hazardous materials during their field activities. Nonetheless, related meetings on general health and safety will be arranged with the local public health office.</li> </ul>

<b>HOURS OF WORK</b>	
<ul style="list-style-type: none"> <li>Young workers work the same time (7.5 to 8 hours per day) as adult workers. They work more than 40 hours a week that does not comply with the local legislation for young workers.</li> </ul>	<ul style="list-style-type: none"> <li>Contracts with the workers are done on a daily basis. Young workers will be provided more breaks during a workday. They will work maximum 40 hours in a week if they are working in whole week.</li> </ul>
<ul style="list-style-type: none"> <li>The seasonal workers employed for the four weeks during the peak period do not have a weekly paid rest day.</li> </ul>	<ul style="list-style-type: none"> <li>Syngenta implemented a weekly paid rest day system in Bergama and Konya in 2018 and will continue the system.</li> </ul>
<b>COMPENSATION</b>	
<ul style="list-style-type: none"> <li>The recruitment agency signs a daily agreement with each worker that contains wage information, but workers do not receive a pay statement when receiving their payments.</li> </ul>	<ul style="list-style-type: none"> <li>Pay statements will be given to workers on a weekly basis.</li> </ul>

## EVALUATION OF SYNGENTA INTERNAL MONITORING SYSTEM

The table below summarizes the improvement points in Syngenta's IMS in Hungary and Turkey.

FLA PRINCIPLES	COUNTRY	PROGRESS	AREAS FOR CONTINUED IMPROVEMENT
LABOR STANDARDS	Hungary		None
	Turkey		<ul style="list-style-type: none"> <li>Trainings do not cover all farmers.</li> <li>Informative materials are all in Turkish and given that all workers may not understand Turkish, translation into other language (e.g. Arabic) is encouraged.</li> </ul>
MONITORING	Hungary	Introduction of a new internal monitoring tool covering all Code of Conduct elements.	
	Turkey		<ul style="list-style-type: none"> <li>IMS does not cover an appropriate sample of annual farm assessments.</li> <li>When farmers recruit workers directly, no records regarding attendance / hours of work and wage compensation are maintained.</li> </ul>
REMEDATION	Hungary	Records for corrective/remedial actions are now maintained.	

		A new procedure for household level assessment and consultation with relevant stakeholders has been developed.	
	<b>Turkey</b>		Syngenta has no procedure on removal and rehabilitation of child labor.
FUNCTIONING GRIEVANCE MECHANISMS	<b>Hungary</b>	A new phone number was established where a skilled psychologist records and report any cases to Syngenta.  Syngenta also established an internal procedure to handle and process the reported grievances in a timely and adequate manner.	There is no written procedure on feedback mechanism to the person who raised the grievance.
	<b>Turkey</b>		<ul style="list-style-type: none"> <li>• Very limited number of calls are received each year and these are mostly PPE related cases.</li> <li>• Records of follow up and outcome are kept when it is related to a CAP but not in other cases.</li> </ul>
CONSULTATION WITH CSOS AND LOCAL AUTHORITIES	<b>Hungary</b>		Improvements required in terms of: <ul style="list-style-type: none"> <li>• Developing a written policy and strategy to engage with relevant civil society organizations, unions and local authorities.</li> <li>• Developing a list of stakeholders to engage with on specific topics.</li> <li>• Consulting periodically with relevant stakeholders</li> <li>• Consulting with relevant stakeholders including unions to devise collective action plans.</li> </ul>
	<b>Turkey</b>	A list of stakeholders has been developed and is updated regularly.	<ul style="list-style-type: none"> <li>• Syngenta has no written policy to engage with stakeholders, although they follow a strategy to engage with organizations and authorities.</li> <li>• The company could not find an NGO in the region to engage with in terms of child labor and education issues; though they are working on alternative plans.</li> </ul>



	<b>Turkey</b>		<ul style="list-style-type: none"><li>• Syngenta does not check if the wages are aligned with locally-recognized living wage calculations.</li></ul>
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