INDEPENDENT EXTERNAL MONITORING OF SYNGENTA’S SEED SUPPLY CHAIN IN INDIA

EXECUTIVE SUMMARY

For the assessment year 2015 - 2016, the FLA conducted unannounced independent external monitoring (IEM) and independent external verification (IEV) visits to assess working conditions at Syngenta’s supplier farms in India, during the period of November 2015 - March 2016.

Five assessments were conducted, of which four were IEMs and one was IEV. The IEMs were conducted in the regions of Buldhana district of Maharashtra (tomato); Warangal district of Andhra Pradesh (rice); and the Koppal district (tomato), and Yerballi, Yellapura, Arasikere districts (hot pepper) of Karnataka. The IEV was conducted in the Khamman district (corn) of Karnataka in January 2016. The IEV assessed the progress of Syngenta’s remediation of non-compliances found at the farm level in previous monitoring visits conducted two years ago (2013) in the same villages.

The assessment teams followed the FLA’s IEM methodology, which comprises four main components: (1) visit to Syngenta’s local offices, (2) visit to supply chain intermediaries like seed organizers, (3) visits to interview growers and farmers, and (4) external stakeholder consultations. FLA external monitors visited a total of 119 smallholder farms, which included 25 farms in Maharashtra, 53 in Andhra Pradesh and 41 in Karnataka. Assessors interviewed a total of 192 workers who were involved in hybridization, pollination, and de-tasseling activities: 51 in Maharashtra, 74 in Andhra Pradesh, and 67 in Karnataka.

This report summarizes the FLA’s findings for its 2015 - 2016 assessments and the companies’ responses to those findings, and summarizes the progress and remaining gaps in remediation of issues found during previous assessments in 2013 and 2014. Regarding the verification results, comparison of the FLA’s findings in 2015 with findings from 2013 shows progress in some areas like code awareness among growers, development of templates and materials for growers, and improvement of empty chemical management. Gaps still remain to be addressed in payment of minimum wages to workers, implementation of age verification processes and maintaining records at farm level, and raising awareness of all workers that Syngenta follows a Workplace Code of Conduct and maintains grievance mechanisms.

To access the detailed reports, please visit http://www.fairlabor.org/affiliate/syngenta.
## 2015 Findings

### SUMMARY OF FLA IEM FINDINGS

#### CODE AWARENESS AND GRIEVANCE SYSTEM

Syngenta has been implementing a program to raise code awareness of growers and workers, which been successful for growers and workers who are directly hired by seed organizers in corn supply chains. However, the outreach to the rest of the workforce is very low in the different regions. In Andhra Pradesh and Maharashtra, almost 80 percent of the workers interviewed were not aware of the code elements except child labor and health and safety. The same applies for the awareness of the existing grievance channels.

Syngenta has taken measures to disseminate code information via visual media like wall paintings, posters, pamphlets and pocket cards, but the coverage of villages is only reaching 30 percent of the production locations so far.

Syngenta initiated code awareness activities through women mobilizers, engaging local women from community and training them to train other workers in the field. This program, where implemented, is greatly helping to reach the majority-female workers. However, success is limited based on differing availability of mobilizers in different regions.

### SUMMARY OF COMPANIES’ COMMITMENTS (Corrective Action Plans)

Syngenta reported that it will conduct short on-the-farm training sessions for all workers to raise code awareness. They will cover 25 percent of the farms during 2016 and progressively cover more farms each year until reaching full scope by 2020. Syngenta will also further disseminate Information Education Communication (IEC) materials like pocket cards, posters, wall paintings, pamphlets, handbooks, and so on, to all the growers and workers in the supply chain. This will enable both literate and illiterate workers to access the information via visual medium. The postings shall be made in the local language.

Syngenta shall incorporate the details of the grievance mechanisms including the local hotline number in the code awareness sessions. In addition to this, Syngenta will form cluster-level grievance committees, which will include the selected representatives from local panchayats and schools, key growers, labor representatives, CSO/NGOs, and the Syngenta team.

Syngenta reported it will strengthen the women mobilizer program by recruiting more mobilizers in some production locations.

### CHILD LABOR

One of the main issues highlighted during the field visits is the lack of systems by growers to oversee or maintain proof of age for the workers. Syngenta has developed a system of gathering information via grower documentation kits (GDKs) but most growers are not aware of how this documentation should be maintained. The assessors observed two children younger than 15 working in the hot pepper fields of the Karnataka region, engaged in cross-pollination activity. There were two young-looking workers identified in tomato fields of Karnataka but due to lack of records, their age could not be verified.

Syngenta reported it will inform the growers about the need to strictly enforce guidelines about not engaging children to work in the farms. Syngenta has identified child labor bridge schools and rehabilitation centers near production locations where children were identified. Support will be sought from these institutions to rehabilitate the identified child laborers.

Syngenta will train growers and seed organizers about the importance of maintaining age proof. The GDKs shall be distributed to all...
While Syngenta has established a system for removing child laborers from the field, there is no child labor remediation system established by Syngenta and therefore there is no system to monitor the steps taken by the company to rehabilitate the children found working in the fields.

**HARASSMENT OR ABUSE**

In Karnataka fields (tomato), assessors observed the risk of sexual harassment of young female workers who often migrate from one farm to the other and travel long distances. In the same fields, assessors also observed some growers not being aware of fair disciplinary practices and using abusive practices yelling at the workers.

In Maharashtra, Syngenta has established a seven-member grievance redressal committee, based on the guidelines established by the Sexual Harassment of Women at Workplace Act 2013, but none of the representatives on the committee are women.

Syngenta reported it will strengthen its training content and communication on harassment and abuse, including sexual harassment. It will also strengthen communication of the grievance channels, especially for female workers, through the women mobilizers and information on hotline.

In Maharashtra, Syngenta shall strengthen the grievance redressal committee by including women representatives, and by involving the village women mobilizers in the committee.

**NON DISCRIMINATION**

Gender discrimination in allocating work to men and women was observed in the villages of Andhra Pradesh (rice), Karnataka (hot pepper) and Maharashtra (tomato). For instance, women are assigned activities like weeding, transplanting, and harvesting (which are lower paid jobs) while men are allocated plowing, and pesticide application jobs, which are higher paid.

In Andhra Pradesh (rice), gender-based wage discrimination was observed in one visited village. Men and women were not paid the same wage for doing exactly the same work (pollination). Men were paid INR 250 a day while women were paid INR 200 only.

Syngenta reported it will educate growers, seed organizers, and workers about issues concerning gender discrimination through regular training programs. These trainings shall be accomplished in phases. Clusters of villages shall be selected, with 25 percent to be completed in 2016, 50 percent in 2017, and all the farms shall be covered by 2019-2020.

Syngenta has also designed a project to be piloted in two production locations (Andhra Pradesh and Maharashtra) to test and implement approaches to ensure gender equality and payment of minimum wages to all workers. This one-year pilot project will begin in the fall 2016. Outcomes of this project and lessons learned will inform the design of a strategy to be implemented in all production locations.

**FORCED LABOR**

In two tomato fields of Karnataka, it was observed that workers were not allowed any breaks between growers, who will be informed about what constitutes age proof and how documentation needs to be maintained for the purpose of verification. The field production team will support the growers to maintain the GDKs and help nominate at least one literate family member or worker.

Syngenta reported it will ensure that the growers and seed organizers are aware that
work, including toilet breaks.

workers must be provided with rest breaks. They will do that through training, communication materials, and the intervention of women mobilizers. Syngenta will closely monitor this issue during its internal monitoring.

**HEALTH AND SAFETY**

In the fields of Andhra Pradesh and Karnataka, the efforts made by Syngenta to inform workers and villagers about health and safety via posters and wall paintings has less coverage and thus there is less awareness among workers. Workers do not have access to any personal protective equipment (PPE) appropriate to the kind of activities they are engaged in.

It was also observed in all the farms that no training on hazards have been provided to workers engaged in handling chemicals. No MSDS (material safety data sheet) was provided in the farms, informing workers and growers of the possible risks associated with using chemicals.

In Andhra Pradesh and Karnataka, a few farms were observed to have unsecured and open wells and unmonitored electrical cables posing high safety risks for workers.

In Karnataka, no first-aid kits were available for the safety of the workers, if faced with injury. Also, workers in the area use water from the bore well as drinking water and do not have access to clean water.

During the IEV in Khamman district of Andhra Pradesh, it was observed that Syngenta had implemented some worker-welfare initiatives. For example, H&S guidelines were made available in booklets, PPE was distributed to workers, and first-aid and chemical trainings were provided to growers. However, the coverage of Syngenta’s outreach is incomplete.

Syngenta has designed a comprehensive HSE training module with the support of an external resource organization under brand name of ‘Syngenta Me&Mine’. This program shall contain modules to bring in attitudinal training to farmers and growers on matters related to H&S like chemical usage, safe handling of chemicals, PPE usage, access to drinking water, possible hazards in the field and ways to combat these hazards. The same shall be incorporated in IEC formats like posters and paintings to disseminate information to all villagers. Women mobilizers (who have been selected from the community) and local NGOs shall be engaged with, to disseminate information to growers, workers, their children and family members.

**HOURS OF WORK AND COMPENSATION**

In the three visited regions, there was no awareness of the legal minimum wages to be paid for various agricultural activities. Therefore, in most cases workers were being paid less than the minimum wages. In Karnataka tomato production, workers were paid 45 percent of the legally required minimum wage; in Andhra Pradesh rice

To address the issue of minimum wages, Syngenta and the FLA organized a multi-stakeholder consultation in 2016 at which various industry experts were invited to provide recommendations. Based on the outcomes of that consultation, Syngenta designed a project to be piloted in two
Progress and Remaining Gaps in Syngenta India Supply Chain

The below table summarizes the progress noted in Syngenta's supply chain in India following corrective action plans in 2013 and 2014 and shows recurring issues and remaining improvement areas identified in 2015.

<table>
<thead>
<tr>
<th>Code Elements</th>
<th>Progress identified by FLA comparing the 2013-2015 assessment results</th>
<th>Areas where sustainable improvement is still needed</th>
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| Code Awareness and Grievance System | ▪ Code awareness trainings are provided to most of the growers and workers that are directly hired by seed organizers in the corn supply chain.  
▪ Communication tools through visual mediums have been posted in 20 percent of the villages.  
▪ Positive results have been achieved in reaching out to female workers to extend code awareness through the women mobilizer program. | ▪ The training program is not reaching all the workers.  
▪ The communication tools are not displayed in all production villages and thus the impact is low.  
▪ Most of the workers and growers are still not aware about the details pertaining to Syngenta's grievance mechanisms.  
▪ The number of women mobilizers is low and most of the production locations are not covered by this program. |
| Child Labor                        | ▪ Syngenta introduced grower documentation kit for growers to maintain age proof records.  
▪ Syngenta co-organized 34 school events designed to | ▪ The documentation kit is not being used by most of the growers, and therefore no strict age verification system is being implemented. |
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<tr>
<th>Non discrimination</th>
<th>Syngenta organized village level awareness sessions communicating information about minimum wages, and wage discrimination issues.</th>
<th>Gender based wage discrimination is still prevalent in the farms. There is gender-based discrimination in the way tasks are allocated between men and women (having earning implications) and in some instances, wage discrimination for the exact same tasks.</th>
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<tr>
<td>Health and Safety</td>
<td>Syngenta developed a manual for its field H&amp;S program, which contains training modules for workers, communication tools and sets of PPE for distribution.</td>
<td>H&amp;S training has not been imparted to all the workers in the farms. There are still gaps seen in workers’ awareness on safe handling of chemicals, access and usage of PPEs, and correct use of pesticides.</td>
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<td>Hours of Work and Compensation</td>
<td>Syngenta introduced documentation kits for growers to enable them to maintain records pertaining to workers, their working hours, wages, and age proof. Syngenta conducted two local stakeholder consultations to discuss challenges pertaining to wages. They also participate in a childcare program steering committee. These forums help to seek support and suggestions from external stakeholders and experts for implementation.</td>
<td>Most farmers have not been using the documentation kit. There is no awareness of the legal minimum wages or the legal limits of working hours by either the growers or farmers. Most workers are paid less than the legal minimum wages.</td>
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