



[2018]

FAIR LABOR ASSOCIATION INDEPENDENT EXTERNAL MONITORING AGRICULTURAL REPORT



Company: Syngenta

Country: India

Crop: Okra

Production Process: Pollination

Assessment Locations: Six villages in Koppal District of Karnataka
(Bukanatti, Kempalli, Market, Yapaladinni, Upalapura, and Vataparvi)

Monitors: Glocal Research Services

Assessment Dates: 29-31 July 2018

Number of assessed farms: 16

Total area covered: 9.25

Number of farmers interviewed: 13

Total number of workers: 60

Number of workers interviewed: 43

To view more about the FLA's work with Syngenta, please visit the FLA website [here](#).
To access the FLA Agriculture Monitoring Benchmarks, please visit [this page](#).

Employment Relationship

Compliance Status

Section	Benchmark	Compliance status	Farms
Human Resource Management System	ER.1.1	In compliance	
	ER.2.1 (PR)	In compliance	
	ER.2.1.1(PR)	In compliance	
Recruitment and Hiring	ER.3.1	Risk of noncompliance	Farm 11, 13, 14, 16
	ER.3.1.1	Risk of noncompliance	Farm 11, 13, 14, 16
	ER.3.1.2	Risk of noncompliance	Farm 11, 13, 14, 16
	ER.4	N/A	
	ER.5.1	N/A	
	ER.5.2	N/A	
	ER.5.3	In compliance	
	ER.6 (PR)	Not Initiated	All Farms
	ER.7.1	In compliance	
	ER.7.2	In compliance	
	ER.7.3	In compliance	
	ER.7.4	In compliance	
	ER.7.5	In compliance	
	ER.7.6	In compliance	
	ER.7.7	In compliance	
ER.7.8	In compliance		
Terms and Conditions	ER.9.1	In compliance	
	ER.9.2	In compliance	
	ER.9.2.1	Noncompliance	All Farms
	ER.9.2.2	In compliance	
	ER.9.2.3	In compliance	
	ER.9.3	In compliance	
	ER.9.3.1	In compliance	
	ER.9.3.2	In compliance	
	ER.9.3.3	In compliance	
	ER.10	N/A	
	ER.11	In compliance	
	ER.12.1	In compliance	
	ER.12.1.1	In compliance	
	ER.12.2	N/A	
	ER.13.1	Noncompliance	All Farms
ER.13.2 (PR)	In Progress	All Farms	
ER.13.3 (PR)	In compliance		
Administration	ER.15.1	In compliance	
	ER.15.2	In compliance	
	ER.15.2.1	Noncompliance	All Farms
	ER.16.1	In compliance	
	ER.16.2	In compliance	
	ER.17.2 (PR)	In Progress	All Farms
	ER.17.3 (PR)	In compliance	
ER.17.4 (PR)	In compliance		
Worker Involvement	ER.18.1	In compliance	
	ER.18.2 (PR)	In compliance	
Right to Organize and Bargain	ER.19	In compliance	
Work Rules and Discipline	ER.20.1	Noncompliance	All Farms
	ER.20.2	Noncompliance	All Farms
	ER.20.3 (PR)	Not Initiated	All Farms
	ER.20.4	Noncompliance	All Farms
	ER.20.6	Noncompliance	All Farms

	ER.20.7	Noncompliance	All Farms
	ER.20.8	Noncompliance	All Farms
	ER.20.9 (PR)	Not Initiated	All Farms
	ER.20.11	Noncompliance	All Farms
Training	ER.21	In compliance	
HSE Management System	ER.24.1.	In compliance	
	ER.24.2 (PR)	In compliance	
	ER.24.3	In compliance	
	ER.24.4 (PR)	In compliance	
	ER.24.4.1 (PR)	In compliance	
	ER.24.4.2 (PR)	In compliance	
	ER.24.4.3 (PR)	In compliance	
	ER.24.4.4 (PR)	In compliance	
	ER.24.4.5 (PR)	In compliance	
	ER.24.4.6 (PR)	In compliance	
	ER.24.5 (PR)	In compliance	
Grievance Procedures	ER.25.1 (PR)	In compliance	
	ER.25.2 (PR)	Not Initiated	All Farms
	ER.25.3	In compliance	
	ER.25.4	Noncompliance	All Farms

Employment Relationship Assessment Summary

Proof of Age Documentation

Benchmarks:

ER.3.1: Employers shall verify proof of age documentation for all young workers in the farm at the time of their employment and work towards collecting and maintaining all documentation necessary to confirm and verify date of birth of all workers, including long term and casual workers.

ER.3.1.1: Employers shall take reasonable measures to ensure such documentation is complete and accurate.

ER.3.1.2: In those cases where proof of age documentation is not readily available or unreliable, employers shall take all necessary precautions which can reasonably be expected of them to ensure that all workers are at least the minimum legal working age, including requesting and maintaining medical or religious records of workers, or through other means considered reliable in the local context.

Risk of Noncompliance in four farms

Findings/Noncompliance Explanation:

The monitors identified seven young workers (six hired seasonal workers and one family labor) doing pollination activity in four of the assessed farms. Although the farmers informed that their age proof documents were maintained, they were however kept in the farmer house. Due to the inaccessibility of the documents and inability to verify the documents, the issue has been identified as risk.

Source: Interviews

Company Action Plan:

Syngenta has identified the farms where the farmers did not maintain the age proofs of the workers. Furthermore, internal monitoring and inspection visit reports of the field production team shall be used to identify the gaps. Based on the assessment, in next season, seed organizers shall be encouraged to have dialogue and meetings with these farmers and inform them about the Syngenta expectations on age proof records. The seed organizers shall be informed to discuss with the farmers before the beginning of the sowing season. In addition, all farmers shall be further informed about age proof documentation during pre-season meetings. So, during farm level worker awareness sessions, the young workers shall be informed and encouraged to carry a copy of their age proof always when they go for work in any farms.

Deadline Date:

1. Identify the non-complied farms - March 2019 (Before start of the season)
2. Dialogue with seed organizer – April 2019 (Before start of the season)
3. Farmers and workers awareness – April/ June 2019

4. Field monitoring – June 2019

Terms and Conditions / Communication

Benchmarks:

*ER.9.2.1: Workers should be made aware of the employment terms under which they are engaged, under provisions of national laws.
ER.13.1: Farmer, share cropper or any kind of supervisor who is leading workers shall have knowledge of the local labor laws and the FLA Code.*

Noncompliance in all farms

Findings/Noncompliance Explanation:

The terms and conditions relating to wages was not in compliance with the local law (more details are enunciated under Compensation).

Farmers showed little awareness on certain code standards like wages, non-discrimination and harassment. Due to lack of awareness among farmers, the information does not get communicated to workers.

Source: Interviews, observation, documentation

Company Action Plan:

Syngenta supplies hand manuals to all the farms which includes the details of all the FLP standards. This will be a reference material to the farmers as well as workers. Current year minimum wage rate shall be noted in this manual for their information. This manual or material shall be always placed in the farms and encouraged during farm level session to refer this always. Syngenta shall have dialogue with seed organizers and identify the gap on implementation of fair labor standards and explain them the roles and responsibilities of ensuring these at field level.

Syngenta FLP (fair labor program) lead will arrange the refresher training to the field team including seed organizer and his team and inform them on all the standards to be ensured at field level and communicate to the farmers and workers.

Pre-season or mid-season farmer meetings and farm level meeting with the workers shall be conducted regularly in the beginning of the season. Field production team shall be engaged and communicated on the FLP standards to all the farmers and at least workers involved in pollination works. Farmers also encouraged communicating this to their workers regularly in crop cycle. In a phase wise manner, the intervention shall be extended to different activities in crop cycle to cover all the workers.

Deadline Date:

Refresher Training to the seed organizers – April 2019
Farmers and workers awareness meeting – April – June 2019
Supply of hand manual - Before start of every season

Wage Advances

Benchmarks:

ER.15.2.1: Advances must be properly documented, and their receipt and accuracy must be confirmed by the recipient worker, in writing whenever possible (e.g. signature, thumbprint).

Noncompliance in all farms

Findings/Noncompliance Explanation:

There is no documentation maintained of the wage advances / advances provided to workers by farmers, before the beginning of the season. As a result, there is no system to administer the accuracy of the advances paid, wages deducted or worker acknowledgement. The number of advances varies from INR 1000 to 5000.

Source: Interviews and observation

Company Action Plan:

Syngenta will have dialogue with the seed organizer and encourage them to ensure the maintenance of documentation at farm level. Also, the company supplies the 'Grower Documentation Kit (GDK) to all the farms every season. Seed organizers shall motivate the farmers to maintain it at the farm level. The field staff of the seed organizer shall regularly inform the farmers how to record the attendance and wage payment, it also includes the advance disbursement to the workers. Syngenta field team shall monitor these during their field visit.

Deadline Date:	Supply of documentation kit - Before start of the season – April 2019 Inform the farmers to maintain the records – September 2019 Field monitoring – September 2019
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Work Rules and Discipline

Benchmarks:

ER.20.1: Employers shall have disciplinary rules and practices that embody a system of progressive discipline (e.g. a system of maintaining discipline through the application of escalating disciplinary action moving from verbal warnings to written warnings to suspension and finally to termination).
ER.20.2: Any person supervising workers shall be aware of the disciplinary rules and practices.
ER.20.4: The disciplinary system shall be applied in a fair and nondiscriminatory manner and include a management review of the actions by someone senior to the manager who imposed the disciplinary action.
ER.20.6: Disciplinary rules and practices shall be clearly communicated to all workers.
ER.20.7: Workers must be informed when a disciplinary procedure has been initiated against them.
ER.20.8: Workers have the right to participate and be heard in any disciplinary procedure against them.
ER.20.11: The disciplinary system shall include a third-party witness during imposition, and an appeal process. In case of small holder settings, existing appeal mechanism at community level is acceptable.

Noncompliance in all farms

Findings/Noncompliance Explanation:

There is no policy and procedure on disciplinary rules or progressive disciplining. As a result, there is no such training imparted to workers.

Source: Interviews, document review, observation

Company Action Plan:

Syngenta shall develop the policy and procedure on disciplinary rules or progressive disciplining by April 2019. Before the start of the season, seed organizers shall be informed and encouraged to communicate with the farmers and workers. During farmer meeting and farm level workers awareness meeting, this shall be communicated. Field team and organizer shall have at least one formal meeting and one-to-one meeting with the workers conducted in crop cycle. Farmer hand manuals shall be updated and include these disciplinary rules & regulations.

Deadline Date:

Develop the disciplinary rules and regulations – By April 2019
Communicate to the seed organizers – By June 2019
Farmer awareness – once in crop cycle before start of the crop activity
Inform to farmers and workers – At least once in crop cycle.

Grievance Procedures

Benchmarks:

ER.25.4: The company shall create awareness of this communication and noncompliance reporting mechanism to its service providers and suppliers.

Noncompliance in all farms

Findings/Noncompliance Explanation:

Although Syngenta has established a grievance system (local helpline number), majority of the workers are not aware of the system since there has been no effort on the part of the farmers to provide information or training on the utility of the grievance channel.

Source: Interviews, observation

Company Action Plan:

Syngenta shall encourage the seed organizer to communicate the grievance procedure to farmers. Before the start of the season, field staff shall organize a meeting with the seed organizers and discuss about all FLP activities, which will also include grievance channel. FLP team already developed various communication tools such as posters, pocket cards, farmer hand manuals, farm boards, pamphlets etc., and it explains about the grievance channel. These materials can be utilized to inform the farmers and workers, and displayed at farm level or key places. Seed organizer and farmers shall communicate this to the farm workers during the farm level workers meeting and encourage them to utilize this facility. Syngenta team will conduct the internal monitoring to verify this.

Deadline Date:

Distribute & place the communication tools – May 2019
Workers awareness on grievance channel – By September 2019

Internal monitoring of farms by production team – By September 2019

Nondiscrimination

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	ND. 1	In compliance	
Recruitment and Employment Practices	ND.2.1	Noncompliance	All Farms
	ND.2.3	In compliance	
Compensation Discrimination	ND. 3	In compliance	
Discrimination in Training and Communication	ND. 4	In compliance	
Marital or Pregnancy-Related Discrimination	ND.5.1	In compliance	
	ND.5.2	In compliance	
	ND.5.3	In compliance	
	ND.6.1	In compliance	
	ND.6.1.1	In compliance	
Health-Related Discrimination	ND. 7	In compliance	
	ND.8	In compliance	
	ND. 9	In compliance	
Respect of Culture and Religion	ND.11	In compliance	

Nondiscrimination Assessment Summary

Recruitment and Employment Practices	
Benchmarks:	Noncompliance in all farms
<i>ND.2.1: Recruitment and employment practices shall be free from any type of discrimination.</i>	
Findings/Noncompliance Explanation:	<p>The recruitment decisions are not purely based on skills, there exists gender-based preferences and division of labor. Women are preferred for labor-intensive, but low-paid activities like sowing, weeding and pollination. While ploughing, pesticide application, loading and unloading are mostly done by men. The wage differences are substantial between sowing, weeding and ploughing and pesticide application. It is therefore not certain that the hiring process is free from gender discrimination and there is no obvious effort in trying to make the group gender-balanced.</p> <p><u>Source:</u> Interviews, observation</p>
Company Action Plan:	Farmers shall be sensitized on the topic of discrimination during pre-season meeting and also during field visit by the production team. Workers' hiring procedure shall be developed by April 2019 and informed to the farmers during pre-season meeting. Hiring practices shall be assessed during internal monitoring of the farms
Deadline Date:	Develop the hiring procedures – By April 2019 Farmer awareness session – every season before sowing. Internal monitoring – once in a cycle

Harassment or Abuse

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	H/A.1.1	In compliance	
	H/A.1.2	Risk of Noncompliance	All Farms
Discipline	H/A.2	In compliance	
	H/A.3	In compliance	
	H/A.4	In compliance	
	H/A.5	In compliance	
	H/A.6	In compliance	
	H/A.7	In compliance	
	H/A.13	In compliance	
Violence	H/A.8.1	In compliance	
	H/A.8.2	In compliance	
	H/A.8.3	In compliance	
Sexual Harassment	H/A.9.1	In compliance	
	H/A.9.2	In compliance	
	H/A.9.3	In compliance	
	H/A.9.4	In compliance	
Security Practices	H/A.10	N/A	
	H/A.10.1	N/A	
	H/A.10.2	N/A	

Harassment or Abuse Assessment Summary

General Compliance	
<p>Benchmarks: <i>H/A/1.2: Workers at the farm shall not be subject to any corporal punishment, sexual harassment, oppression, coercion or any other kind of mental or physical abuse or intimidation, disregarding whether they are family members without a formal contract or hired staff.</i></p>	<p>Risk of Noncompliance in all farms</p>
<p>Findings/Noncompliance Explanation:</p>	<p>Farmers and workers showed limited understanding on workplace harassment. There is no committee or systems (according to Sexual Harassment of Women at Workplace Act 2013) within Syngenta to address issues concerning sexual harassment at farm level.</p> <p>Source: Interviews</p>
<p>Company Action Plan:</p>	<p>Syngenta team shall be responsible to review the guidelines under the local law and prepare a plan of remediation on the issue. In addition to this, all the local team including Syngenta and seed organizer team shall be engaged on training and awareness on workplace harassment and abuse. Syngenta shall develop communication materials which helps sensitize on workplace harassment. These communication materials shall be distributed in all the farms.</p> <p>Once the general awareness is established among the target group, Syngenta shall also highlight the internal helpline number and suggestion box, which the farmers or workers could use to report any incidences.</p> <p>Syngenta shall initiate a formal engagement of CSOs in a phase wise manner. Once formal engagement is established, it shall plan to form sexual harassment redressal committee.</p>

Deadline Date:	<p>Review of the local law and establishment of internal policies and procedures – May 2019</p> <p>Engagement of local team on training and awareness on workplace harassment – Once every year starting May 2019</p> <p>Development of communication material on workplace harassment at farms – May 2019</p> <p>Distribution of communication materials in all the farms – June 2020</p> <p>Long term plan: Establishment of sexual harassment committee</p>
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Health, Safety and Environment

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	HSE.1.	In compliance	
Documents, Permits and Certificates	HSE.2 (PR)	In compliance	
	HSE.3.1	In compliance	
	HSE.4 (PR)	In compliance	
Evacuation Requirements and Procedure	HSE.5.1 (PR)	In compliance	
	HSE.5.2	In compliance	
Safety Equipment and First Aid	HSE.6.1 (PR)	In Progress	All Farms
	HSE.6.2 (PR)	In Progress	All Farms
	HSE.16.3 (PR)	In Progress	All Farms
Personal Protective Equipment	HSE.7 (PR)	In Progress	All Farms
	HSE.8	Noncompliance	All Farms
Chemical Management	HSE.9.1	In compliance	
	HSE.9.2	Noncompliance	All Farms
	HSE.9.2.1	Noncompliance	All Farms
	HSE.10	Noncompliance	All Farms
	HSE.11.1	In compliance	
Protection Reproductive Health	HSE.11.2	In compliance	
	HSE.12.1	In compliance	
Infrastructure	HSE.12.2 (PR)	In compliance	
	HSE.13 (PR)	In compliance	
	HSE.17.1	In compliance	
	HSE.17.2 (PR)	In compliance	
	HSE.19 (PR)	In compliance	
	HSE.21 (PR)	Not Initiated	All Farms
Machinery Safety	HSE.22 (PR)	Not Initiated	All Farms
	HSE.14.1	Noncompliance	All Farms
	HSE.14.2	Noncompliance	All Farms
	HSE.14.3	Noncompliance	All Farms
Ergonomics and Medical Facilities	HSE.14.4	In compliance	
	HSE.15.2 (PR)	In compliance	
	HSE.16.2	In compliance	

HSE Assessment Summary

Personal Protective Equipment	
<p>Benchmarks: <i>HSE.8: Workers shall be provided with training on the use and maintenance of personal protective equipment.</i></p>	
Noncompliance in all farms	
<p>Findings/Noncompliance Explanation:</p>	<p>The workers were not provided with appropriate PPEs (personal protective equipment) like aprons, hats, boots to protect them from pollination hazards. Workers were seen using their own PPEs like shirts or aprons while most did not wear any PPEs.</p> <p>Source: Observation, worker interviews</p>
<p>Company Action Plan:</p>	<p>Syngenta conducts the Health & Safety awareness session in the farms regularly, targeting the farmers, their family and farm workers. Syngenta has strong HSE management system and always follow all the protocols of HSE system. The field assessment has undertaken on environment, occupational hazards parameters and based on the result the HSE team suggests the applicability of PPEs. In a phase wise intervention Syngenta proposed to implement it further. In first the phase, it shall target the farmers and by 2020, all the farmers shall be covered. During these farm level campaigns; Syngenta encourages them to use minimum personal protective clothing for general works in the farm. Field level demos shall also be provided in this session. As per internal monitoring and field observations, all the farm workers use full sleeve shirts and cover their faces with <i>gumcha</i> or towels. Syngenta supplied PPE for hazardous activities like chemical spraying or fertilizer application etc.</p> <p>Syngenta will further entrust responsibility to seed organizers to engage farmers on the training and information generation on PPE usage. Each individual seed organizer shall be responsible to oversee these tasks. Still Syngenta production team, in close consultation with the country FLA Lead shall overview and oversee the progress of the implementation every six months.</p> <p>Syngenta developed the IEC tools like posters, pocket cards, hand manual etc., which also explains about the PPE usage and ensured the usage or display of these tools in all the farms. Seed organizers and production teams shall play roles in this, and ensure the effective utilization.</p>
<p>Deadline Date:</p>	<p>Capacity building training to field staff and seed organizers on HSE – May 2019 Farm level farmers and workers awareness on field HSE – focusing on PPE usage – After completion of sowing – Every season Field monitoring and regular review - Every quarter Distribution and use of communication materials – Every season (at least 3 years)</p>
Chemical Management / Training	
<p>Benchmarks: <i>HSE.9.2: All chemicals and hazardous substances shall be properly labeled and stored in secure and ventilated areas and disposed of in a safe and legal manner, in accordance with applicable laws. Where relevant, Material Safety Data Sheets (MSDS) must be available as well.</i> <i>HSE.9.2.1: Labels shall be placed in the local language and the language spoken by workers, if different from the local language. Where workers are illiterate, the labels and instructions for their handling should be depicted by pictograms.</i> <i>HSE.10: Workers shall receive training, appropriate to their job responsibilities, concerning the hazards, risks and the safe use of chemicals and other hazardous substances.</i></p>	
Noncompliance in all farms	
<p>Findings/Noncompliance Explanation:</p>	<p>Syngenta statutory guidelines are not followed in case of disposal of used chemical containers. Chemicals used in the farms are not properly segregated or labelled. There is no separate place allocated for storing of chemicals. Most of the farmers store the chemicals in their homes without putting them in a separate box with a lock. Hired workers involved in chemical handling have not received any training on the use</p>

	and application of chemicals. <u>Source:</u> Interviews, observation
Company Action Plan:	<p>Syngenta launched ‘HSE for Me’ – field safety campaigns and did capacity building training for all the field production team including the seed organizers. In 2018, Syngenta organized training for its team members and all staff including Syngenta production team, seed organizers, field team etc. Safe chemical management is one of the key topics in this training module. The team discussed in detail and developed both short- and long-term action plans.</p> <p>Next step is to communicate the same thing to the next level – farmers and workers. Phase wise farmers and workers awareness campaigns are planned. In the first phase, all the farmers and their families shall be covered in village of cluster of farms level and later extended to workers also at individual farm level.</p> <p>Various communication tools are developed such as posters, snake & ladder and ludo games to sensitize the workers groups. Farm level workers awareness sessions shall be conducted by the seed organizers and field production team. It is the responsibility of the farmers to ensure it in their farms – safe storage of chemicals, labelling, segregation and safe disposal of empty containers, etc. Field production teams shall have field inspection to check the status – Twice in crop cycle</p>
Deadline Date:	<ol style="list-style-type: none"> 1. Refresher training on ‘HSE for Me’ for field production team and seed organizers – annually - May 2019 2. Farmers and workers awareness on safe chemical management – once in a season 3. Distribution of communication tools – every season 4. Field monitoring by the FP team – once in a crop cycle – flowering stage
Machinery Safety	
<p>Benchmarks:</p> <p><i>HSE.14.1: All production machinery, equipment and tools shall be properly guarded and regularly maintained.</i></p> <p><i>HSE.14.2: Where appropriate, workers shall receive training in the proper use and safe operation of machinery, tractors, equipment and tools they use.</i></p> <p><i>HSE.14.3: Employers shall ensure that safety instructions are either displayed or posted near all machinery or are readily accessible to the workers in language(s) spoken by workers. Where workers are illiterate, the instructions should be depicted by pictograms.</i></p>	
Noncompliance in all farms	
Findings/Noncompliance Explanation:	<p>The machinery used in the farms like irrigation pump set and sprayers were not properly guarded. They did not have proper casing. Also, workers who use them lack proper training on its handling and maintenance. There is no communication material on machine safety for workers.</p> <p><u>Source:</u> Observation, interviews</p>
Company Action Plan:	<p>Syngenta launched ‘HSE for Me’ – field safety campaigns and did capacity building training for all the field production team including the seed organizers. In 2018, Syngenta organized training for its team members and all staff including Syngenta production team, seed organizers, field team etc. Safe chemical management is one of the key topics in this training module. The team discussed in detail and developed both short- and long-term action plans.</p> <p>Next step is to communicate the same thing to farmers and workers. In a phase wise manner, farmers and workers awareness campaigns are planned. In the first phase, all the farmers and their families shall be covered in a village of cluster of farms level and later extended to workers also at individual farm level.</p> <p>Various communication tools are developed such as posters, snake & ladder and ludo games to sensitize the workers groups. Farm level workers awareness sessions shall be conducted by the seed organizers and field production team. It is the responsibility</p>

	of the farmers to ensure it in their farms – safe storage of chemicals, labelling, segregation and safe disposal of empty containers, etc. Field production team shall have field inspection to check the status, twice in every crop cycle.
Deadline Date:	<ol style="list-style-type: none"> 1. Refresher training on ‘HSE for Me’ for field production team and seed organizers – annually - May 2019 2. Farmers and workers awareness on safe chemical management – once in a season 3. Distribution of communication tools – every season 4. Field monitoring by the FP team – once in a crop cycle – flowering stage

Compensation

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	C.1.1	Noncompliance	All Farms
	C.1.2	In compliance	
	C.1.3	In compliance	
	C.1.4 (PR)	In compliance	
Minimum Wage/Fair Compensation	C.2.1	Noncompliance	All Farms
	C.2.2	In compliance	
	C.2.3	In compliance	
	C.2.5 (PR)	Not Initiated	All Farms
	C.2.6 (PR)	Not Initiated	All Farms
	C.3	In compliance	
Farmer/Producer Income	C.4 (PR)	In Progress	All Farms
Wage Payment and Calculation	C.6	In compliance	
	C.7.1	In compliance	
	C.7.2	In compliance	
	C.7.3 (PR)	In Progress	All Farms
	C.7.4 (PR)	Not Initiated	All Farms
	C.7.5	In compliance	
	C.8.1	In compliance	
	C.8.2	In compliance	
	C.8.3	In compliance	
	C.8.4(PR)	In compliance	
	C.9(PR)	In compliance	
	C.10.1	In compliance	
	C.10.1.1	In compliance	
	C.10.2	In compliance	
C.10.3	In compliance		
Workers Awareness	C.11.1.1	In compliance	
	C.11.1.2	In compliance	
	C.11.1.3	In compliance	
	C.11.1.4	In compliance	
	C.11.1.5	Noncompliance	All Farms
	C.13(PR)	Not Initiated	All Farms
Fringe Benefits	C.12.1	In compliance	
	C.12.2(PR)	In compliance	
	C.12.3	In compliance	
	C.12.4	In compliance	
	C.12.5	In compliance	

Compensation Assessment Summary

General Compliance	
<p>Benchmarks: C.1.1: Employers shall comply with all national laws, Collective Bargaining Agreements in force, regulations and procedures concerning the payment of compensation to workers.</p>	
Noncompliance in all farms	
<p>Findings/Noncompliance Explanation:</p>	<p>The prevailing wage rates paid to workers working in the okra pollination activity are below the legal minimum wages. The current minimum daily wage rate is INR 330.25 (Basic INR 200 + VDA INR 130.25) with effect from 1-4-2018 to 31-3-2019. However, the wages paid to workers for 7.5 to 8 hours of work is between INR 160-180.</p> <p><u>Source:</u> Interviews, observation</p>
<p>Company Action Plan:</p>	<p>Syngenta FLP team has done internal gap analysis related to fair compensation and developed both short- and long-term plans to ensure the payment of minimum wage in the farm activities.</p> <p>Short term plans:</p> <ul style="list-style-type: none"> • Workers awareness on minimum wage shall be also planned at farm level by the field team on phase wise. In the first phase, workers of projected tasks shall be targeted. • Use of various communication tools such as farmer hand manuals, posters, pocket cards etc. • Encourage to maintain the records at farm level and regular farm monitoring. <p>Long term plans:</p> <ul style="list-style-type: none"> • Pilot implementation of fair compensation project – select the sample farms and ensure the payment of fair wages at least for one task. • Extension of project to all larger area and all the tasks in phase wise. • Engagement of CSOs for larger influence among the target group and build the supportive environment. Planned to hire local NGOs as a resource agency and utilize the resource in awareness campaign at ground level to the farmers and workers. Initially planned in one location and extended to other locations also. And in addition to this, NGO teams can help Syngenta to create supporting environment by influencing the local leaders, government and non-government agencies, make them to involve in motivating the famers. Annual based projects are planned to implement and assessed once yearly to know the process.
<p>Deadline Date:</p>	<ol style="list-style-type: none"> 1. Farmers and workers awareness – Every season 2. Distribution and use of communication tools – Every season 3. Encourage to maintain the farm level record – Every season 4. Review of procurement price – Every season – Before start of the season 5. Pilot project on fair compensation - April to July 2019 6. Extension of the project - 2025 or based on the trend 7. Initiate formal CSO engagement –by 2020
Minimum Wage/Fair Compensation	
<p>Benchmarks: C.2.1: Employers shall pay workers at least the legal minimum wage, the prevailing industry sector wage, or the wage pursuant to Collective Bargaining Agreements that are in force, whichever is higher, for regular working hours (not including overtime). Hourly or daily compensation shall be calculated based on the basis of the legal minimal wage, the prevailing industry sector wage, or the wage pursuant to Collective Bargaining Agreements that are in force, whichever is higher. Workers should also be informed by the employer</p>	
Noncompliance in all farms	

<i>about the legal minimum wage applicable to them.</i>		
Findings/Noncompliance Explanation	<p>The farmers and workers do not have awareness on legal minimum wages. The prevailing wage rates paid to workers are below the legal minimum wages. For cross pollination activity in okra, the farmers are paying between Rs.160 and Rs.180 per day, whereas the legal minimum wages in Karnataka state for agricultural activities is INR 330.25 (Basic Rs.200 + VDA Rs.130.25) with effect from 1-4-2018 to 31-3-2019.</p> <p><u>Source:</u> Interviews, observation</p>	
Company Action Plans:	<p>Syngenta FLP team has done internal gap analysis related to the fair compensation and developed both short- and long-term plans to ensure the payment of minimum wage in the farm activities.</p> <p>Short term plans:</p> <ul style="list-style-type: none"> • Continue the farmers and workers awareness on minimum wage. • Use of various communication tools such as farmer hand manual, posters, pocket cards etc. • Encourage to maintain the records at farm level and regular farm monitoring. <p>Long term plans:</p> <ul style="list-style-type: none"> • Review the procurement price and ensure the consideration of the minimum wage rate as per local law. • Pilot implementation of fair compensation project – select the sample farms and ensure the payment of fair wages at least for one task. • Extension of project to all larger area and all the tasks in phase wise. • Engagement of CSOs for larger influence among the target group and build the supportive environment 	
Deadline Date:	<ol style="list-style-type: none"> 1. Farmers and workers awareness – Every season 2. Distribution and use of communication tools – Every season 3. Encourage to maintain the farm level record – Every season 4. Review of procurement price – Every season – Before start of the season 5. Pilot project on fair compensation - April to July 2019 6. Extension of the project - 2025 or based on the trend 7. CSO Engagement - 2020 	
Workers Awareness		
<p>Benchmarks:</p> <p><i>C.11.1.5: Employers shall communicate in writing or orally where necessary to all workers all relevant compensation information in the local language or language spoken by the workers, if different from the local language.</i></p>		Noncompliance in all farms
Findings/Noncompliance Explanation	<p>Workers are not informed about the legal minimum wages by the farmers since they are not aware themselves of the updated legal minimum wages. The prevailing wages are governed by the current demand-supply situation of labor force. Thus, there is no dispute raised or any system established.</p> <p><u>Source:</u> Interviews, observation</p>	
Company Action Plans:	<p>Syngenta will have a formal discussion with the seed organizers and encourage them to communicate with the farmers and workers about the local minimum wage rate for current periods. Syngenta will develop the different communication tools and update the current season wage rates in those tools.</p> <p>Seed organizer and field team shall communicate with the farmers during pre-season or mid-season meetings and farm level meetings to the workers. At least one formal</p>	

	meeting shall be planned and one-to-one awareness meeting also shall be done during field visit by the field team. Field teams shall use the communication tools to inform the target groups on local minimum wage rates.
Deadline Date:	Discussion with the seed organizers and communicate the MW – Before start of the season – April 2019 Pre-season awareness meeting – April- May 2019 Farm level workers session - May – June 2019 Use of communication tools – Apr – July 2019

Overview - Farms vs. Non-compliances

Total number of Farms:16

	Employment Relationship	Non-discrimination	Harassment or Abuse	Forced Labor	Child Labor	Freedom of Association and Collective Bargaining	Health, Safety and Environment	Hours of Work	Compensation	Total
% of farms with non-compliances or risk of non-compliances	100%	100%	100%	0%	0%	0%	100%	0%	100%	
Farm 1	11	1	1	0	0	0	7	0	3	23
Farm 2	11	1	1	0	0	0	7	0	3	23
Farm 3	11	1	1	0	0	0	7	0	3	23
Farm 4	11	1	1	0	0	0	7	0	3	23
Farm 5	11	1	1	0	0	0	7	0	3	23
Farm 6	11	1	1	0	0	0	7	0	3	23
Farm 7	11	1	1	0	0	0	7	0	3	23
Farm 8	11	1	1	0	0	0	7	0	3	23
Farm 9	11	1	1	0	0	0	7	0	3	23
Farm 10	11	1	1	0	0	0	7	0	3	23
Farm 11	14	1	1	0	0	0	7	0	3	26
Farm 12	11	1	1	0	0	0	7	0	3	23
Farm 13	14	1	1	0	0	0	7	0	3	26
Farm 14	14	1	1	0	0	0	7	0	3	26
Farm 15	11	1	1	0	0	0	7	0	3	23
Farm 16	14	1	1	0	0	0	7	0	3	26
TOTAL	185	16	16	0	0	0	112	0	48	377