



[2018]

FAIR LABOR ASSOCIATION INDEPENDENT EXTERNAL MONITORING AGRICULTURAL REPORT

Company: Syngenta

Country: India

Crop: Hot Pepper

Production Process: Pollination

Assessment Location: Shirala and Nalvira villages, Jalna, Maharashtra

Monitor: IRFT

Assessment Dates: 23-27 October 2018

Number of assessed farms: 14

Total area covered: 7 Acre

Number of farmers interviewed: 14

Total number of workers: 156

Number of workers interviewed: 156

Employment Relationship

Compliance Status

Section	Benchmark	Compliance status	Farms
Human Resource Management System	ER.1.1	In compliance	
	ER.2.1 (PR)	In progress	All farms
	ER.2.1.1 (PR)	In progress	All farms
Recruitment and Hiring	ER.3.1	Noncompliance	Farms 1,3,6,12
	ER.3.1.1	Noncompliance	Farms 1,3,6,12
	ER.3.1.2	Noncompliance	Farms 1,3,6,12
	ER.4	N/A	
	ER.5.1	N/A	
	ER.5.2	N/A	
	ER.5.3	N/A	
	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	In compliance	
	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	Noncompliance	Farms 1,2,3,4,5,6
	ER.12.1.1	Noncompliance	Farms 1,2,3,4,5,6
	ER.12.2	N/A	
	ER.13.1	In compliance	
ER.13.2 (PR)	Not Initiated	Farms 1,2,3,4,5,6	
ER.13.3 (PR)	Not Initiated	Farms 1,2,3,4,5,6	
Administration	ER.15.1	In compliance	
	ER.15.2	In compliance	
	ER.15.2.1	Risk of 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 progress	All farms
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
Access to Training for Family Members	ER.21	Noncompliance	Farms 1,2,3,4,5,6
HSE Management System	ER.24.1.	Noncompliance	All farms
	ER.24.2 (PR)	Not Initiated	All farms
	ER.24.3	In compliance	
	ER.24.4 (PR)	Not Initiated	All farms
	ER.24.4.1 (PR)	Not Initiated	All farms
	ER.24.4.2 (PR)	Not Initiated	All farms
	ER.24.4.3 (PR)	Not Initiated	All farms
	ER.24.4.4 (PR)	Not Initiated	All farms
	ER.24.4.5 (PR)	Not Initiated	All farms
	ER.24.4.6 (PR)	Not Initiated	All farms
Grievance Procedures	ER.24.5 (PR)	Not Initiated	All farms
	ER.25.1 (PR)	In compliance	
	ER.25.2 (PR)	Not Initiated	All farms
	ER.25.3	In compliance	
	ER.25.4	Noncompliance	Farms 1,2,3,4,5,6

Employment Relationship Assessment Summary

Proof of Age Documentation	
<p>Benchmarks:</p> <p><i>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.</i></p> <p><i>ER.3.1.1: Employers shall take reasonable measures to ensure such documentation is complete and accurate.</i></p> <p><i>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.</i></p>	<p>Noncompliance in four farms</p>
<p>Findings/Noncompliance Explanation:</p> <p>The audit team observed four female young workers involved in cross pollination activity in four farms. They were above 15 years, but below 18 years of age. There was no system to ascertain the accurate age of the workers since no age proof records were maintained by the farmers.</p> <p><u>Source:</u> Interviews, observation, documentation review.</p>	
<p>Company Action Plan:</p>	<ol style="list-style-type: none"> Syngenta has developed a policy and procedure on age verification procedure in the farms and has been motivating the farmers during the field visit by the production team at regular intervals According to Syngenta’s internal monitoring findings, around 80% farmers maintain the age proof documents. Syngenta team aims to identify the existing gaps for the other 20% of the farms where the records are still not maintained. Syngenta field teams will continue to provide information and support the seed organizers based on the gaps identified. The details of the internal monitoring / field visit, along with the assessments undertaken to understand the gap and its remediation plan shall be maintained at the IMS center. Syngenta shall, in the next step, engage with two seed organizers under whom the farmers documents were maintained. Syngenta shall first try to engage in a dialogue with the seed organizers and on the challenges of maintaining such records. Based on the information received, Syngenta will strengthen the information kit for such seed organizers and farmers, on how to maintain such records for the future.

Deadline Date:	<ul style="list-style-type: none"> • Visit to the seed farms – verify the existing age proof document – 6 months (June 2019 – December 2019) • Visit to the seed organizers and conduct gap analysis - sharing of information kit and training to seed organizers (July 2019 – December 2019)
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Terms and Conditions

<p>Benchmarks:</p> <p>ER.12.1: Employers shall regularly inform workers about work place rules, health and safety information, and laws regarding workers' rights with respect to freedom of association, compensation, working hours, and any other legally required information, and the FLA Code through appropriate means, including posted in local language(s) throughout the workplace's common areas or in the surrounding community. In the case of workplaces with informal labor structures, these communication and awareness raising activities could be done with support from supply chain intermediaries such as cooperatives, organizers, tier one suppliers or the participating company.</p> <p>ER.12.1.1: Employers shall inform workers that any form of harassment or abuse in the workplace shall be subject to disciplinary measures.</p>	Noncompliance in six farms
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Findings/Noncompliance Explanation:	<p>In farms under Deulgaon Raja region, there was no woman mobilizer appointed (who is appointed by Syngenta to conduct farm visit / home visit to disseminate information on code standards) therefore, there was no system to disseminate information to the workers on workplace rules, health and safety, local regulations, disciplinary measures and so on.</p> <p><u>Source:</u> Farmer and worker interviews, observation.</p>
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Company Action Plan:	<p>Syngenta field team has been given the responsibility to disseminate the information of code standards to farmers and workers, which includes workplace rules, health and safety, local regulations, disciplinary measures and so on.</p> <p>Further to this, Syngenta has planned to engage with a local NGO which will help Syngenta in propagating the message on labor standards to the farmers and workers. The NGO, in consultation with Syngenta, will sensitise the farmers and workers on workplace standards, health and safety, local regulations, disciplinary measures, etc. This will be a pilot project in year 2019, and depending on its success and feasibility, Syngenta will widen the scope in other areas.</p>
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Deadline Date:	<ul style="list-style-type: none"> • Pilot project on formal engagement with NGO – July to Dec 2019. The project planner shall be finalized by June end and shared with FLA by next season. • Training the NGO team on FLA COC – July 2019 • Implementation by NGO – July to Dec 2019 • Internal monitoring – Three times in crop cycle
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Administration

<p>Benchmarks:</p> <p>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).</p>	Risk of Noncompliance in all farms
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Findings/Noncompliance Explanation:	<p>Although no discrepancy was highlighted, but it was observed that wage advances provided to workers was not documented properly. The wage advances were recorded in a hand notebook where entries were registered. However, there was no acknowledgement by the workers nor any validation of the information inserted. This practice poses a risk of employment terms between farmers and workers.</p> <p><u>Source:</u> Workers interview, documents reviewed.</p>
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<p>Company Action Plan:</p>	<p>Syngenta designed new attendance and wage payment recording template and distributed in all the farms. It is meant to be user-friendly for the farmers to record wages, advances paid to the workers and provision to gather worker acknowledgment. As this was the first attempt to systematically record the wages and advances, many of the farmers have been in the process of using it / not used it just as yet. Thus, Syngenta team shall be engaging with seed organizers to conduct in-depth training on record maintenance during pre-season or mid-season meetings with the farmers.</p> <p>In addition to this, the field production team, during internal monitoring, will help the farmers to understand and motivate them to maintain the wage and advance payment records. In case of illiterate farmers, Syngenta team will assist them in maintaining the records.</p> <p>Field Production and FLP team will monitor the farms during their routine field visit to ensure the records are maintained properly.</p>
<p>Deadline Date:</p>	<ul style="list-style-type: none"> • Training farmers and seed organizer team – June 2019 • Distribution of wage payment register – June 2019 • Ensure record wage payment register by allfarmers – Dec 2020 • Internal monitoring – At least three times in crop cycle

<p>Work Rules and Discipline</p>	
<p>Benchmarks:</p> <p><i>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).</i></p> <p><i>ER.20.2: Any person supervising workers shall be aware of the disciplinary rules and practices.</i></p> <p><i>ER.20.4: The disciplinary system shall be applied in a fair and non-discriminatory manner and include a management review of the actions by someone senior to the manager who imposed the disciplinary action.</i></p> <p><i>ER.20.6: Disciplinary rules and practices shall be clearly communicated to all workers.</i></p> <p><i>ER.20.7: Workers must be informed when a disciplinary procedure has been initiated against them.</i></p> <p><i>ER.20.8: Workers have the right to participate and be heard in any disciplinary procedure against them.</i></p> <p><i>ER.20.11: The disciplinary system shall include a third-party witness during imposition, and an appeal process. In case of smallholder settings, existing appeal mechanism at community level is acceptable.</i></p>	<p>Noncompliance in all farms</p>
<p>Findings/Noncompliance Explanation:</p>	<p>There are no rules and regulations for the farmers / seed organizers on disciplinary rules and practices. Therefore, there is no information communicated to seed organizers and farmers.</p> <p><u>Source:</u> Farmer, seed organizer, company representative interviews, document review</p>
<p>Company Action Plan:</p>	<p>Syngenta shall develop policy and procedure on discipline systems. Under this system, Syngenta shall develop a sub-policy on progressive discipline, which shall ensure that the farmers and seed organizers take action against indiscipline in farms through progressive steps.</p> <p>This policy shall be part of the Syngenta ‘Farmer Hand Manual’, which shall contain all the relevant policies and procedures, as mentioned under this CAP. This shall be distributed in all the farms, during the pre-season meetings or whenever there is any training conducted every year.</p> <p>Syngenta shall inform seed organizers about the disciplinary rules and practices and shall expect them to inform all the farmers about the steps – 1.5 years</p>
<p>Deadline Date:</p>	<ul style="list-style-type: none"> • Develop the policy on disciplinary rules and regulations – By May 2019 • Communicate to the seed organizers – By June 2019

- Farmerawareness – Once in crop cycle before start of the crop activity

Access to Training for Family Members

Benchmarks:

ER.21: Family members (spouses and adult children) involved directly or indirectly in agriculture production shall have access to all training and awareness raising activities conducted for the workers and farmers on the farms.

**Noncompliance
in six farms**

**Findings/Noncompliance
Explanation:**

A female mobilizer conducts awareness programs for farmers and their family members, but there is no such system established in Deulgaon Raja division as the post is vacant. Farmer's family members do not attend pre-season meetings in which training is given about company's COC and other relevant policies. Therefore, there is less awareness in the farms in this region.

Source: Interviews of family members working in farm.

Company Action Plan:

Syngenta field team has been given the responsibility to disseminate the information of code standards to farmers and workers which includes workplace rules, health and safety, local regulations, disciplinary measures and so on.

Due to budgetary constraints, the appointment of a female mobilizer has been put on hold for a while. During this time, Syngenta intends to identify and engage with a local NGO which will help Syngenta in propagating the message on labor standards to the farmers and workers. The NGO, in consultation with Syngenta, will sensitise the farmers and workers on workplace standards, health and safety, local regulations, disciplinary measures, etc. This will be a pilot in year 2019, and depending on its success and feasibility, Syngenta will widen the scope in other areas.

Deadline Date:

- Pilot project on formal engagement with NGO – July – Dec 2019
- Training the NGO team on FLA COC – July 2019
- Implementation by NGO – July to Dec 2019
- Internal monitoring – three times in crop cycle

HSE Management System

Benchmarks:

ER.24.1: Health, safety and environmental rules shall be communicated to all workers in the local language or language spoken by workers if different from the local, language.

**Noncompliance
in all farms**

**Findings/Noncompliance
Explanation:**

Information and basic instructions on workplace conditions (health and safety dos & don'ts) is provided by Syngenta to farmers in the FAR, and also during pre-season meeting and it is expected that farmers propagate it to workforce. But these instructions are not communicated to the workers. There is no verbal communication or any visual information or any system to ensure that farmers impart information to workers.

Source: Observations, workers interviews

Company Action Plan:

Syngenta launched an internal program on workplace health and safety rules named 'HSE FOR ME' which includes conducting field safety campaigns and capacity building training for all the field production teams including the seed organizers. The last training was conducted in July 2018.

The next step is to communicate the same thing to the next level stakeholders—farmers, their family and workers. In a phase-wise manner, farmers and workers awareness campaigns are planned. In the first phase, all the farmers and their families

	<p>shall be covered at village or cluster level and later extended to workers at individual farm level.</p> <p>Syngenta has also developed various communication tools which are easier for the community people to connect with such as posters, snake & ladder and Ludo games to sensitize the workers groups. The posters and games have been shared with FLA. The games and posters provide information on various health and working standards while also providing a means of entertainment. The posters explain the 'do's & don'ts' with more pictorial and graphic messages which is helpful for the illiterate workers working in the farms. These tools shall be used during farm level workers awareness sessions by the field team.</p> <p>Syngenta shall also initiate a pilot project on formal engagement with one local NGO by June 2019 and utilise their manpower to build awareness especially among the workers at farm level. Syngenta FLP team shall provide the training to these NGO team.</p> <p>Field production team shall have field inspection to check the status – at least twice in crop cycle.</p>
Deadline Date:	<ul style="list-style-type: none"> • Pilot project on formal engagement with NGO and worker's awareness– July - Dec 2019 • Farmers, farmer family and workers awareness on HSE – By 2022 to all • Distribution of communication tools – every season • Field monitoring by the FP team – three times in a crop cycle

Child Labor

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	CL.1	In compliance	
Minimum Age	CL.2	In compliance	
Immediate Family Members	CL.3	In compliance	
Right to Education	CL.4.1 (PR)	In compliance	
Young Workers	CL.5	In compliance	
	CL.6.1	In compliance	
	CL.6.2	Noncompliance	Farms 1,3,6,12
	CL.7	In compliance	
Apprenticeships and Vocational Training	CL.8.1 (PR)	In compliance	
	CL.8.2 (PR)	In compliance	
Children on Premises	CL.9	Risk of Noncompliance	Farms 2,7,10
Removal and Rehabilitation of Child Laborers	CL.10.1	In compliance	
	CL.10.2 (PR)	In compliance	

Child Labor Assessment Summary

Young Workers		
<p>Benchmarks <i>CL.6.2: Employers shall maintain a list of all young workers, their entry dates, proof of age and description of their assignment.</i></p>		<p>Noncompliance in four farms</p>
<p>Findings/Noncompliance Explanation:</p>	<p>There were four female young workers involved in cross pollination activity in four farms. They were above the age of 15 years, but below 18 years and employed by farmers from the current season. Farmers did not maintain any age proof record or any record of the workers which would provide information of their working hours, description of work, wages and so on.</p> <p><u>Source:</u> Worker interviews, farmer interviews, record review.</p>	
<p>Company Action Plan:</p>	<p>Syngenta encourages its farmers to maintain the age proof documents at the farm level for all its workers. Field level policy and procedure have been developed to ensure implementation and there is regular monitoring during internal field visits. According to the internal monitoring findings, around 80% farmers maintain the age proof documents. Syngenta team staff will identify the existing gaps of the other 20%. And then provide information and support to the seed organizers based on the gap assessment. The details of the internal monitoring / visit, the gap and the remediation shall be maintained at the IMS centre.</p> <p>Syngenta shall, in the next step, engage with the two seed organizers, where no documents are maintained. Syngenta shall first try to engage in a dialogue with the seed organizers on the challenges of maintaining such records. Based on the information received, Syngenta will strengthen farmer hand manuals for such seed organizers and farmers, and on how to maintain such records for future.</p>	
<p>Deadline Date:</p>	<ul style="list-style-type: none"> • Visit to the seed organizers and farmers and gap analysis of the existing age proof document – 6 months (June 2019 – December 2019) • Visit to the seed organizers (two farms) and gap analysis and sharing of information kit and training to seed organizers (July 2019 – December 2019) • Distribution of farmer hand manual & documentation kit – Every season • Field monitoring – three times in a crop cycle 	

Children on Premises		
<p>Benchmarks <i>CL.9: The employer shall ensure that children (including those residing on the farm and those of migrant workers) are not exposed to dangerous agriculture production activities, including exposure to chemicals/pesticides.</i></p>		<p>Risk of Noncompliance in three farms</p>
<p>Findings/Noncompliance Explanation:</p>	<p>In three farms, mothers of small children (sometimes lactating) were brought along to the field during working hours. There was no designated place in the field / farm for the children, so the mothers would leave them on the floor or allow them to roam around. In addition to absence of any child care space, there was also risk of exposing children to chemical hazards in case of chemical spraying.</p> <p><u>Source:</u> Worker interview, farmer interview, field observation.</p>	
<p>Company Action Plan:</p>	<p>Syngenta field team discourages the workers from bringing their children to farm and also motivates them to send the children to local child-care centres – also known as <i>anganwadis</i> (government sponsored child-care centres)</p> <p>In situations where the nursing and working mothers bring their small children to farms wherein they don't have other options, Syngenta team encouraged aged female members from seed organizer or farmer family to take care of these children near the farms or in farmers' houses. The farmer shall be responsible for arranging this in</p>	

	<p>his/her house or nearby farms with all the necessary required facilities such as safe water, food (not required if the mother brings), etc. Before the start of the crop activities, field team identifies the risk and inform the farmers to provide the child-care facilities. This shall be done on pilot basis in the 2019 season in one village and later extend to all the farms. These can be observed and verified during farm visit.</p> <p>Further precautions shall be taken in and around the farm to designate safe places to leave the children to play near the farm. In addition to this, farmers shall be encouraged to provide temporary rest houses near farms and avoid all hazardous materials, areas, etc. During field inspection visits, the field team shall observe the farm, and if any deviation or issue is found, immediate action shall be taken to avoid the risk.</p>
Deadline Date:	<ul style="list-style-type: none"> Farmer awareness on working or nursing mother and children – every season Establish individual farmer level child care facilities in one village – Dec 2019 and extend to other farms by 2022 Internal monitoring – three times in a cycle

Freedom of Association and Collective Bargaining

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	FOA.1	In compliance	
Right to Freely Associate	FOA.2	In compliance	
	FOA.3	In compliance	
	FOA.8	In compliance	
	FOA.20	In compliance	
Anti-Union Behaviour	FOA.4	In compliance	
	FOA.5.1	In compliance	
	FOA.5.1.1	In compliance	
	FOA.6	In compliance	
Union Representatives	FOA.7	In compliance	
Employer Interference	FOA.9.1	In compliance	
	FOA.9.2	In compliance	
	FOA.9.3	In compliance	
	FOA.10	In compliance	
	FOA.10	In compliance	
Collective Bargaining	FOA.12.1	In compliance	
	FOA.12.2	In compliance	
	FOA.13.2	Noncompliance	All farms
	FOA.13.3	In compliance	
	FOA.14	N/A	
	FOA.15	N/A	
	FOA.16.1	N/A	
	FOA.16.2	N/A	
Right to Strike	FOA.18	In compliance	
	FOA.19	In compliance	

Freedom of Association Assessment Summary

Collective Bargaining	
<p>Benchmarks</p> <p><i>FOA.13.2: Small holders have the right to bargain collectively in accordance with the enterprise that purchases their product.</i></p>	
Noncompliance in all farms	
<p>Findings/Noncompliance Explanation:</p>	<p>There was no opportunity of collective agreement between Syngenta with seed organizer and farmer regarding price of the seed product. It was noted from the farmers that there is only verbal communication from Syngenta on price and target setting of the seed production.</p> <p><u>Source:</u> Farmer Interviews.</p>
<p>Company Action Plan:</p>	<p>Syngenta conducts an annual seed organizer workshop wherein Syngenta discusses about the challenges faced in the last season and also decides the way forward for next season. This includes compliance, fair procurement, quality standards, production volumes, etc. In this meeting, seed organizers speak on behalf of farmers.</p> <p>Syngenta procurement team has developed a robust and transparent farmer offer methodology which is thoroughly discussed during the workshop and the procurement prices are finalised. As per this protocol, the Syngenta procurement team collects the data on production costs through farmer’s interview, review of farm level documentations, interaction with stakeholders, review local regulations etc. Based on these, procurement and field production teams develop the farmer offer price.</p> <p>In the next phase, Syngenta enters in a tri-party agreement in which the procurement price is mentioned, which is already negotiated in seed organizer workshop. Syngenta procurement team will relook into this and ensure that farmers are consulted and informed when we decide the procurement price.</p>
<p>Deadline Date:</p>	<ul style="list-style-type: none"> • Review of production costs – every June – July • Annual seed organizer workshop – Every August during pre-season meeting with the farmers – every season

Health, Safety and Environment

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	HSE.1.	Noncompliance	All farms
Document Maintenance, Permits and Certificates	HSE.2 (PR)	Not Initiated	All farms
	HSE.3.1	N/A	
	HSE.4 (PR)	N/A	
Evacuation Requirements and Procedure	HSE.5.1 (PR)	N/A	
	HSE.5.2	In compliance	
Safety Equipment and First Aid	HSE.6.1 (PR)	In progress	All farms
	HSE.6.2 (PR)	Not Initiated	All farms
	HSE.16.3 (PR)	In progress	All farms
Personal Protective Equipment	HSE.7 (PR)	In compliance	
	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 (PR)	In compliance	
	HSE.12.1	In compliance	
Infrastructure	HSE.12.2 (PR)	In compliance	
	HSE.13 (PR)	N/A	
	HSE.17.1	In compliance	
	HSE.17.2 (PR)	Not Initiated	All farms
	HSE.19 (PR)	N/A	
	HSE.21 (PR)	Not Initiated	All farms
Machinery Safety	HSE.22 (PR)	Not Initiated	All farms
	HSE.14.1	In compliance	
	HSE.14.2	In compliance	
	HSE.14.3	In compliance	
Ergonomics and Medical Facilities	HSE.14.4	In compliance	
	HSE.15.2 (PR)	Not Initiated	All farms
	HSE.16.2	In compliance	

Notable Feature

Syngenta has provided RO (reverse osmosis) plant in village Shirala which provides safe drinking water to the villagers. It is a good practice and initiative and could be replicated in other villages.

HSE Assessment Summary

General Compliance	
Benchmarks:	<i>HSE.1: Employers shall comply with all national laws, regulations and procedures concerning health, safety, and the environment.</i>
Findings/Noncompliance Explanation:	There was lack of awareness among farmers about banned chemicals and pesticides, usage of PPEs while spraying chemicals. Chemicals were stored in unsafe conditions where they were not under lock and key, and had easy access for children. Also, there were materials and other items like cattle food stored alongside which poses risk.

	<p>MSDS were not posted at chemical storage areas, first aid instructions were not posted at relevant places. Farmers have lack of knowledge about legal products and about toxicity labelling (According to Rules 37-44, Chapter VIII of Insecticides Rules 1971).</p> <p><u>Source:</u> Farmers interview, field observation.</p>
Company Action Plan:	<p>Syngenta team ensures that no banned chemicals are supplied in their production area and all chemicals and pesticides are supplied by seed organizers in consultation with Syngenta. Syngenta launched a campaign 'HSE FOR ME' which explains about all field safety standards. A capacity building training on this for all the field teams was done in Aug 2018, and developed new communication tools which will be distributed from June 2019.</p> <p>Further, with the help of internal and external experts, a training module shall be developed to sensitise and motivate the farmers and workers on field safety standards. By June 2019, this training module shall be ready to use. Field teams shall continue the awareness / training with the help of new training module to all the stakeholders – farmers, their family members and workers, and in phases, all target groups shall be covered in 3 years. These modules shall cover topics on risk identification, safe chemical management, and other field safety guidelines.</p> <p>The farmers shall be encouraged to collect a copy of chemicals information leaflets which is supplied with every chemical and maintained at farm level. And Syngenta shall prepare and distribute the first aid instruction leaflets to all the farms and encourage the farmers to maintain at farms and accessible to workers.</p> <p>During the internal monitoring field team will ensure on the implementation.</p>
Deadline Date:	<ul style="list-style-type: none"> • Develop new 'HSE For Me' training module for stakeholder's training – June 2019 • Cluster or village level farmer and workers training on HSE FOR ME – In phase wise cover all by 2022 • Distribute communication tools – June 2019 • Distribute first aid manual – By Dec 2019

Personal Protective Equipment (PPE)

Benchmarks:

HSE.8: Workers shall be provided with training on the use and maintenance of personal protective equipment.

**Noncompliance
in all farms**

**Findings/Noncompliance
Explanation:**

Syngenta provides PPE kits to farmers, but there is no system to determine to oversee if the workers wear appropriate PPEs during field activities. For pollination work, some workers were seen wearing shirts, scarves but there was no additional PPEs provided by farmers. During interviews, it was noted that workers involved in chemical spraying seemed to have less awareness about PPE usage. There has been no training conducted by Syngenta or the farmers on the use of PPEs.

Source: Observation, interviews with farmers.

Company Action Plan:

Syngenta has launched PPE program and under this program, PPEs are supplied to the farmers in a phase wise manner. Syngenta intends to provide the PPEs to high risk activities performed by the workers such as chemical spraying, seed treatment etc. The objective is to introduce them to PPEs and encourage them to use it. Field production teams shall arrange the field level demonstrations to the farmers and workers before the start of the activity. It is the responsibility of the farmers to

	<p>provide necessary PPEs and encourage them to use regularly. Syngenta intends and encourage the farmers to buy their own in future.</p> <p>Syngenta team, during their internal monitoring always encourages the farmers and workers to ensure the protection while performing hazardous activities especially during chemical handling. Team motivates the farmers and workers to use the PPE whenever it is required.</p> <p>As mentioned above (HSE.1), Syngenta designed a new program ‘HSE For Me’ to focus on all these field safety measures. It also focuses on creating awareness and motivating all types of stakeholders on field safety which will also include PPE usage methods and demonstration. All farmers and workers shall be reached under this campaign phase wise.</p>
Deadline Date:	<ul style="list-style-type: none"> • PPE distribution & demonstration - In phase wise cover all by 2022 • Farmers and workers training on HSE FOR ME (Including PPE usage) – In phase wise cover all by 2022 • Monitoring visit – three times in a crop cycle

Chemical Management	
<p>Benchmarks:</p> <p><i>HSE.9.2: All chemicals and hazardous substances shall be properly labelled 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></p> <p><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></p> <p><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>	<p>Noncompliance in all farms</p>
<p>Findings/Noncompliance Explanation:</p>	<p>There was no MSDS available at chemical storage. Chemicals were stored at such places where free movements of animals and people and could lead to chemical hazards. Empty chemical containers were found lying in the field. There was no proper disposal method used for empty chemical containers, farmers either burn the empty chemical containers/pouches or bury them in the pit dug at one corner in their fields. There was no training to farmers / workers engaged in chemical spraying. There was lack of awareness among farmers about safe chemical handling and storage.</p> <p><u>Source:</u> Observation, interview with farmers and workers</p>
<p>Company Action Plan:</p>	<p>MSDS is always available with the packets of chemicals bought, but there is a tendency for the farmers to not read it. Also, it is not possible for all the MSDS to be posted in the field since farmers use multiple chemicals and pesticides. Syngenta intends to create a compiled shorter version of the key elements of most elements and provide to farmers. Syngenta encourages farmers to maintain important leaflets at farm level. All the elaborated copies of MSDS for all chemicals shall be maintained at IMS centres.</p> <p>Syngenta will internally collaborate with crop protection division and organise the safe chemical handling trainings for farmers and workers which would include handling of chemicals, disposal of empty container and pouches and first aid management. Initially, the hot pepper farms shall be covered and in phase wise manner, the other locations and crops shall be implemented by 2021.</p>
<p>Deadline Date:</p>	<ul style="list-style-type: none"> • Training and maintaining shorter versions of MSDS at farm level – June 2019 • Alignment with crop protection team and develop training module – June 2019 • Training to all hot pepper farmers – July & Aug 2019

- Extension of this approach to other crops – 2019 – 2021

Overview - Farms vs. Non-compliances

	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 noncompliances or risk of noncompliances	100%	0%	0%	0%	13%	0%	100%	0%	100%	
Farm No. 1	16	0	0	0	1	1	5	0	0	23
Farm No. 2	9	0	0	0	1	1	5	0	0	16
Farm No. 3	16	0	0	0	1	1	5	0	0	23
Farm No. 4	13	0	0	0	0	1	5	0	0	19
Farm No. 5	13	0	0	0	0	1	5	0	0	19
Farm No. 6	16	0	0	0	1	1	5	0	0	23
Farm No. 7	9	0	0	0	1	1	5	0	0	16
Farm No. 8	9	0	0	0	0	1	5	0	0	15
Farm No. 9	9	0	0	0	0	1	5	0	0	15
Farm No. 10	9	0	0	0	1	1	5	0	0	16
Farm No. 11	9	0	0	0	0	1	5	0	0	15
Farm No. 12	12	0	0	0	1	1	5	0	0	19
Farm No. 13	9	0	0	0	0	1	5	0	0	15
Farm No. 14	9	0	0	0	0	1	5	0	0	15
TOTAL	158	0	0	0	7	14	70	0	0	249