



[2018]

FAIR LABOR ASSOCIATION INDEPENDENT EXTERNAL MONITORING AGRICULTURAL REPORT

Company: Syngenta

Country: India

Crop: Sweet Pepper

Production Process: Pollination

Assessment Location: Jalna and Buldhana, Maharashtra

Monitor: Maya Talkar

Assessment Dates: 13-16 November 2018

Number of assessed farms: 6

Total area covered: 1.75 Acre

Number of farmers interviewed: 6

Total number of workers: 16

Number of workers interviewed: 16

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	Noncompliance	All farms
	ER.3.1.1	Noncompliance	All farms
	ER.3.1.2	Noncompliance	All farms
	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	Noncompliance	Farm 2
	ER.7.7	In compliance	
ER.7.8	In compliance		
Terms and Conditions	ER.9.1	In compliance	
	ER.9.2.1	Noncompliance	Farms 2
	ER.9.2.2	In compliance	
	ER.9.2.3	Noncompliance	Farms 2, Farm 3
	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	All farms
	ER.12.1.1	Noncompliance	All farms
	ER.12.2	N/A	
	ER.13.1	In compliance	
	ER.13.2 (PR)	Not Initiated	All farms
ER.13.3 (PR)	Not Initiated	All farms	
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	Noncompliance	All farms
	ER.18.2 (PR)	Not Initiated	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	All farms
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)	In Progress	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.

ER.7.6: contract, temporary, casual, daily, seasonal or migrant workers receive at least the minimum wage or the prevailing industry wage whichever is higher, and all legally mandated benefits such as social security, other forms of insurance, annual leave and holiday pay.

**Noncompliance
in
all farms**

**Noncompliance
in one farm**

**Findings/Noncompliance
Explanation:**

1) There is no age proof verification system observed in the farms. Although farmers are aware that they must verify age records, but they state that workers fail to provide it as they are reluctant to share personal records with the farmers.

2) Payment of minimum wage issue was observed in one farm. It was observed that the workers were being paid lower (INR 200) than the legal minimum wage (INR 214.53).

Source: Workers interviews, farmers interview, wage record review

Company Action Plan:

1) Syngenta has developed policy and procedure on age verification system in the farms and the field staff has been engaged to motivate the farmers during every field visit. According to Syngenta internal monitoring, it was observed that around 80% farmers maintain the age proof documents. Syngenta team staff will identify the existing gaps with the other 20% and then provide information and support to the Seed organizers based on the gap identified. The details of the internal monitoring / visit, the gap and the remediation shall be maintained at the IMS center. In the next step, Syngenta shall engage with two pre-selected 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 information kits for such seed organizers and farmers, on how to maintain such records for future.

	<p>2) During Syngenta’s internal monitoring report, it was confirmed that one farmer (Farm No. 2) pays around INR 200 to the workers. Syngenta field production team visited the farm and analyzed the farm activities. It was observed that the workers employed are from same village and not paid any extra benefits. So, the production team encouraged the farmer to pay the wage rate equal to minimum wage rate and also maintain the proper documentation at farm level. This farm shall be monitored in the upcoming season. Furthermore, Syngenta has initiated fair compensation project in hot pepper farms and decided to extend the project to sweet pepper also in the 2019 production cycle. Based on the project guidelines, stringent monitoring of farms shall be adopted to verify the payment of fair wage to the workers.</p>
Deadline Date:	<ul style="list-style-type: none"> • Visit the non-complied farms and analyze the gaps (age verification & underpayment) – By April 2019 • Dialogue with the seed organizers about the gap & its remediation – June 2019 • Extension of fair compensation project to sweet pepper (pollination) – Aug to Jan 2019

Terms and Conditions	
<p>Benchmarks:</p> <p><i>Employment terms shall be those to which the worker has voluntarily agreed, provided those terms do not fall below:</i></p> <p>ER.9.2.1: provisions of national laws;</p> <p>ER.9.2.3: the FLA Workplace Code.</p> <p>ER.12.1: Employers shall regularly inform workers about workplace 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, this 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>	<p>Noncompliance in one farm</p> <p>Noncompliance in all farms</p>
Findings/Noncompliance Explanation:	<p>1) Terms and conditions on wages was not based on the national law. Although the daily legal minimum wage payment of the area is INR 214.53, the workers working (in one farm) were being paid INR 200. While in another farm, there was discrepancy observed with regard to wage payment on record and wages paid to workers. Workers informed that they were being paid INR 200 plus INR 20 as travel allowance, but on record, they signed against INR 215.</p> <p>2) Although the employment terms and conditions are verbally communicated to the workers. However, there was no information provided on legal minimum wages, grievance procedures, and disciplinary rules; therefore, there was no awareness observed among workers.</p> <p><u>Source:</u> Workers interviews, farmers family members interview, observation</p>
Company Action Plan:	<p>During Syngenta’s internal monitoring report, it was confirmed that one farmer (Farm No.2) pays around INR 200 to the workers. Syngenta field production team visited the farm and analyzed the farm activities and observed that the workers employed in the farm are from same village and not paid any extra benefits. So, production team encouraged the farmer to pay the wage rate equal to minimum wage rate and also maintain the proper documentation at farm level. This farm shall be monitored in the upcoming season.</p> <p>Syngenta developed a ‘Farmer Hand Manual’ that shall contain all the relevant</p>

	<p>policies and procedures, legal minimum wages, grievance procedures, and disciplinary rules, etc. This shall be distributed to all the farmers, during the pre-season meetings or during any training conducted in a year. Field team shall inform seed organizers about the disciplinary rules and practices, and shall expect them to inform all the farmers about the steps.</p>
Deadline Date:	<ul style="list-style-type: none"> Farmer awareness on fair compensation – June-Aug 2019 Procure and distribution of farmer hand manual – By Aug 2019 Communicate to the seed organizers – By June 2019

Administration	
<p>Benchmarks: <i>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).</i></p>	
	<p>Noncompliance in all farms</p>
Findings/Noncompliance Explanation:	<p>Wage advances are not properly documented. They are roughly maintained in a diary or notebook. Acknowledgement/signature of the worker is not taken to confirm receipt or maintain accuracy of the amount taken.</p> <p><u>Source:</u> Workers interviews, record review</p>
Company Action Plan:	<p>Syngenta designed new attendance and wage payment recording template and distributed in all the farms. It is more user-friendly from the previous version and easy for the farmers to record the wage and advance paid to the workers along with their acknowledgment. As this was the first attempt to systematically record the wage and advances, many of the farmers have not used it properly on daily basis. It indicates that, in-depth training is required for farmers and seed organizers. Syngenta will organize the training session on maintaining the attendance and wage payment records.</p> <p>In addition to this, the field production team will help the farmers, during internal monitoring visits, to understand the situation 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. Field production team will monitor the farms during their routine field visit to ensure the records are maintained properly.</p>
Deadline Date:	<ul style="list-style-type: none"> Distribution and support to record document – to all farms in every season Training farmers and seed organizers – every season Ensure record maintenance in wage payment register – every season Internal monitoring – three times in crop cycle

Worker Involvement	
<p>Benchmarks: <i>ER.18.1: Employers shall have a clear and transparent system of worker and employer communication that enables workers to consult with and provide input to the employer or the company management. This might include regular conversation between workers and employer, suggestion boxes, workers committees, designated spaces for worker meetings, and meetings between employer and workers' representatives. For small farms with informal labor structures, this means that the workers can openly reach and communicate with the producer/farmer.</i></p>	
	<p>Noncompliance in all farms</p>
Findings/Noncompliance Explanation:	<p>There is no system to ensure that there is any kind of consultation between worker and farmer, but an uncontested acknowledgement of the traditional employment practices.</p>

	Source: Worker interviews, farmer interviews
Company Action Plan:	<p>Syngenta has planned to engage with a local NGO (CARDS – based at Jalna) which will help Syngenta in propagating the message of compliance. Dialogue with NGO team and procurement is in progress to finalise the project design. This NGO in consultation with Syngenta will sensitize the workers on consultation between worker and farmer. This will be a pilot project from July to Dec 2019, and depending on its success and feasibility, Syngenta will widen the scope to other areas.</p> <p>The organization also works towards building and strengthening the communication between the farmers and workers. Local level stakeholder committees shall be formed, or existing ones strengthened with involvement of all the stakeholders including farmers and workers, to discuss on fair workplace standards, worker’s concerns, etc. NGOs shall also coordinate with the external stakeholders whenever support would be required.</p>
Deadline Date:	<ul style="list-style-type: none"> • Formal engagement with NGO –July - Dec2019 • Form / strengthen the local stakeholder committees – Dec 2019 • Implementation by NGO on pilot basis – July to Dec 2019 • Extend to other locations based on the outcome – From 2020 onwards • Internal monitoring – three times crop cycle

Work Rules and Discipline	
<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 small holder settings, existing appeal mechanism at community level is acceptable.</i></p>	<p>Noncompliance in all farms</p>
Findings/Noncompliance Explanation:	<p>Syngenta has not established any disciplinary rules or procedures to be executed at farm level. Therefore, there is no information provided to farmers or workers. There is no system to trace any worker retribution.</p> <p>Source: Worker / farmer interview, record review</p>
Company Action Plan:	<p>Syngenta shall develop policy and procedure on disciplinary practices. Under this system, Syngenta shall develop a sub-policy on retribution or retaliation which shall ensure that the farmers and seed organizers take action against indiscipline in farm through progressive steps. This policy shall be part of the Syngenta ‘Farmer Hand Manual’ and that shall contain all the relevant policies and procedures, as mentioned under this CAP. This shall be distributed to all the farmers, during the pre-season meetings or whenever there is any training conducted</p> <p>Syngenta shall inform seed organizers about the disciplinary rules and practices and shall expect them to inform all the farmers and workers about the steps.</p>
Deadline Date:	<ul style="list-style-type: none"> • Develop the policy on disciplinary rules and regulations – by May 2019 • Communicate to the farmers and workers – every season

- Distribution of farmer hand manual - every season

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 all farms**

**Findings/Noncompliance
Explanation:**

There is no extra effort by Syngenta to include family members like the spouses of male farmers. Since it is culturally a practice to invite only male members, the women do not participate, although they expressed the need to.

Source: Farmer and farmer spouse interviews

Company Action Plan:

Syngenta field production team conducts the farm level workers' awareness session with the involvement of family members of those involved in farm activities.

Further, Syngenta has also planned to engage with a local NGO which will help Syngenta in propagating the message of compliance by reaching all the workers including their family members. This NGO, in consultation with Syngenta, will sensitize the farmers, workers and family members involved in farm activities, on all workplace standards, health and safety, local regulations, disciplinary measures, etc. The female staff of this organization will help to build the rapport with the farmer family and F2F meeting could be conducted. This will be a pilot in year 2019, and depending on its success and feasibility, Syngenta will widen the scope to other areas.

Various communication tools were developed to build the bonding with the program. These tools were designed according to the local traditional practices and rural taste; it easily helps in program acceptance among these worker and family members. These tools shall be distributed during the farm or home visit.

Deadline Date:

- Formal engagement with NGO – July to Dec2019
- Training the NGO team on FLA COC – June 2019
- Distribution of communication tools – Every season
- Implementation by NGO on pilot basis – July to Dec 2019
- Extend to other locations based on the outcome – From 2020 onwards
- 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:**

There are only few information placards on HSE which does not encompass all aspects of HSE in the farm. There is no effort initiated by Syngenta or the farmers to provide any training or awareness on HSE related matters to workers.

Source: Worker / farmer interview

Company Action Plan:

Syngenta launched 'HSE For Me' which includes field safety campaigns and capacity building training with all the field production teams including the seed organizers.

Next step is to communicate the same thing to the next level stakeholders– farmers, their family members and workers. In a phase wise manner, farmer and worker

	<p>awareness campaigns are planned. In the first phase, all the farmers and their families shall be covered at village or cluster 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. These games are very popular among young and adults and provide a good source of entertainment and information. It shall be used during farm level workers' awareness sessions by the field team. The posters explain the 'dos & don'ts' with more pictorial and graphic messages which helps even illiterate workers to understand.</p> <p>As mentioned above, Syngenta initiating the formal engagement with one local NGO by June 2019, and utilised their manpower to build the awareness especially among the workers at farm level. Syngenta FLP team provides the training to these NGO teams.</p> <p>Field production teams shall have field inspection to check the status – at least three times in a crop cycle.</p>
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Deadline Date:	<ul style="list-style-type: none"> • 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
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Grievance Procedures

<p>Benchmarks: <i>ER.25.4: The company shall create awareness of this communication and noncompliance reporting mechanism to its service providers and suppliers.</i></p>	<p>Noncompliance in all farms</p>
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Findings/Noncompliance Explanation:	<p>A grievance system in the form of a local phone number has been made available in the farms which are printed and posted in FAR and communication materials. However, there is no training or information dissemination to farmers and workers on its usage. Most farmers know about the number, but don't know its purpose. None of the workers were aware of the phone number or its use.</p> <p><u>Source:</u> Farmers, workers interviews</p>
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Company Action Plan:	<p>Syngenta team disseminates the information of grievance handling to workers during every seasonal meeting in farms. Further to this, Syngenta has planned to engage with a local NGO – CARDS (Jalna based) which will help Syngenta in propagating the message of compliance. The NGO, in consultation with Syngenta, will sensitize the workers on all compliance matters along with grievance mechanism. Female staff of the NGO shall meet and disseminate the information on grievance procedure to farmers, and farm workers at least 4 to 5 times. These staff shall also visit the farm or farmer's house to interaction with them. As discussed above, this will be a pilot project in year 2019, and depending on its success and feasibility, Syngenta will widen the scope to other areas and has to cover all the farms and workers under this project.</p>
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Deadline Date:	<ul style="list-style-type: none"> • Formal engagement with NGO – July - Dec2019 • Training the team of NGO– June 2019 • Implementation by NGO on pilot basis – July to Dec 2019 • Extend to other locations based on the outcome – From 2020 onwards
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- Internal monitoring – three times in a crop cycle

Harassment or Abuse

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	H/A.1.1	Noncompliance	All farms
	H/A.1.2	In compliance	
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	Noncompliance	
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	In compliance	
	H/A.10.1	In compliance	
	H/A.10.2	In compliance	

Harassment or Abuse Assessment Summary

General Compliance	
<p>Benchmarks: H/A.1.1: Employers shall comply with all national laws, regulations and procedures concerning discipline, violence, harassment or abuse.</p>	<p>Noncompliance in all farms</p>
<p>Findings/Noncompliance Explanation:</p> <p>Syngenta has not formed Internal Complaints Committee at IMS level. This is a legal requirement under Section 4(1) of the Sexual Harassment of Women at Workplace Act, 2013. Furthermore, according to the legislation, Syngenta must also organize workshops and awareness programs at regular intervals for sensitizing employees with the provisions of the act. Currently, there is no such practice.</p> <p><u>Source:</u> Farmers, workers interview, IMS visit</p>	
<p>Company Action Plan:</p>	<p>Syngenta established a grievance redressal committee at the national level and also formed two local stakeholders' committees at D. Raja & Lonar location. Both the committees have representatives from Syngenta, local NGOs, government bodies (panchayat), farmers, workers etc. and local women mobilizers and female representatives from local community and workers group are the members of this group. These committees shall be further strengthened by Dec 2019 and develop the formal operation procedures. Once / twice in a year, a meeting is held with all the members. Sexual harassment incidences can also be handled by these committees. If any grievance is registered, national committee shall review the cases and escalate to</p>

	<p>local committee for further investigation and recommendations. Based on recommendation, remediation action can be taken.</p> <p>Syngenta field production shall inform and create awareness to the farmers and workers during farm or village level sessions/trainings. Farmer manual and communication tools shall be updated with the details of this committee.</p>
Deadline Date:	<ul style="list-style-type: none"> • Develop the operation procedure for steering committee – Dec 2019 • Awareness session to the farmers and workers on grievance redressal procedure & committee – By 2022

Discipline	
<p>Benchmarks: H/A.13: Employers shall only apply corrective measures and discipline which are well explained to workers and are with the intention of continuous improvement</p>	
Noncompliance in all farms	
Findings/Noncompliance Explanation:	<p>There is no awareness about workplace harassment nor any system established about disciplinary measures to protect workers. No training has been conducted for farmers or seed organizers, and therefore, there is no information dissemination for workers.</p> <p><u>Source:</u> Farmers, workers interview</p>
Company Action Plan:	<p>Syngenta shall develop policy and procedure on disciplinary practices, which shall ensure that the farmers and seed organizers take action against indiscipline in farm through progressive steps. This policy shall be part of the Syngenta 'Farmer Hand Manual' and it shall contain all the relevant policies and procedures, as mentioned under this CAP. This shall be distributed to all the farmers, during the pre-season meetings, or whenever there is any training conducted. Syngenta shall inform seed organizers about the disciplinary rules and practices and shall expect them to inform all the farmers and workers about the steps.</p>
Deadline Date:	<ul style="list-style-type: none"> • Develop the policy on disciplinary rules and regulations – By May 2019 • Communicate to the farmers and workers – Every season • Distribution of farmer hand manual - Every season

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	In compliance	
	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	Noncompliance	Farm 2
Removal and Rehabilitation of Child Laborers	CL.10.1	In compliance	
	CL.10.2 (PR)	In compliance	

Child Labor Assessment Summary

Notable Feature

Syngenta, along with other seed companies (like Monsanto, East-West, Kalash, Sakata, Advanta, Mahyco, Bayer and EnzaZaden) organized a public rally on 12/June/2018 in the village Shirala of Jalna district to commemorate ILO World Day against Child Labor. The theme of the rally was 'Generation: Safe and Health'. It was participated by around 170 people and volunteers from Syngenta and the village carried posters, pamphlets on two-wheelers to sensitize people about child labor and importance on its elimination. Farmers appreciated the unity of seed companies towards child labor elimination and showed 100% commitment to 'No child labor' in their farms.

Children on Premises

Benchmarks

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.

**Noncompliance
in one farm**

Findings/Noncompliance Explanation:

A girl child of about 11-12 years was found in one farm, sitting on one of the plant bed in the net house. She had accompanied her relative who was working in the farm. She was enrolled in school and was visiting her relative for vacations. However, allowing children in farms exposes them to health risk since there is regular pesticide spraying in the farm. There were no precautionary measures for separate shed/area for children provided by the farmer.

Source: Farmer, worker interviews, observation

Company Action Plan:

Syngenta field team always discourages the workers to bring their children to farm and motivate them to send the kids to schools. Sometimes, nursing mothers or working mothers, who do not have support at home, bring their small children. Syngenta, in those cases, have encouraged farmers to arrange for an aged female member from farmer family to take care of these children at farmer's house. The implementation of this could be observed and verified during Syngenta farm visit. Syngenta has already tried the approach in a cluster of 4-5 farms which has proved successful. Further precautions shall be taken in and around the farm, by designating

	a safe place to leave the children to play near the farm. In addition to this, farmers shall be encouraged to install temporary rest houses nearby farms and avoid all hazardous materials, areas, etc. And the farmer shall be responsible to arrange this in his house or near the farms with all the necessary required facilities such as safe water, food (not required if the mother brings), etc. During field inspection visit by the field production staff, they shall observe the farm, and if any deviation or issue is found, immediate action shall be taken to avoid the risk.
Deadline Date:	<ul style="list-style-type: none"> Farmer awareness on working or nursing mother and children – Every season Internal monitoring – three times in a cycle

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)	In compliance	
	HSE.3.1	N/A	
	HSE.4 (PR)	N/A	
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 compliance	
	HSE.6.2 (PR)	Not Initiated	All farms
	HSE.16.3 (PR)	In compliance	
Personal Protective Equipment	HSE.7 (PR)	In compliance	
	HSE.8	In compliance	
Chemical Management	HSE.9.1	In compliance	
	HSE.9.2	In compliance	
	HSE.9.2.1	In compliance	
	HSE.10	In compliance	
	HSE.11.1	Noncompliance	Farm 1
Protection Reproductive Health	HSE.11.2 (PR)	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)	Not Initiated	All Farms
	HSE.19 (PR)	N/A	
	HSE.21 (PR)	Not Initiated	All Farms
Machinery Safety	HSE.22 (PR)	In compliance	
	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)	N/A	
	HSE.16.2	In compliance	

HSE Assessment Summary

General Compliance	
<p>Benchmarks: HSE.1: Employers shall comply with all national laws, regulations and procedures concerning health, safety, and the environment.</p>	
Noncompliance in all farms	
<p>Findings/Noncompliance Explanation:</p>	<p>Farmers were not aware of safe disposal of used pesticide / chemical packages as stated in Rule 44 of The Insecticides Rules, 1971. They have never been informed by Syngenta about safe disposal methods. As a local practice, they usually burn the used packages which is a huge environment hazard.</p> <p><u>Source:</u> Farmer interview, observation.</p>
<p>Company Action Plan:</p>	<p>Syngenta will internally collaborate with crop protection division and organise the safe chemical handling training for farmers and workers, which shall include handling of chemicals, disposal of empty container and pouches and first aid management. Initially, the team will cover all sweet pepper farmers and slowly cover entire location by 2021. Syngenta launched this campaign under “HSE FOR ME” initiative which explains about all field safety standards. With the help of internal and external experts, a training module is in the process of development, to sensitize and motivate the farmers and workers on field safety standards. By June 2019, this training module shall be ready to use. Field team shall continue the awareness / training with the help of new training module with all the internal stakeholders – farmers, farmer’s family and workers. In phase wise manner, these target groups shall be covered by 3 years. These training modules shall also cover topics related to safe disposal of used chemical containers. During the last internal visit, it was observed that the farmers have installed temporary collection points in their fields and dispose / bury away from habitation. During the field visit by the field team they shall have regular monitoring in a crop cycle, and if they find any issues, improvements needed shall be suggested on the spot.</p>
<p>Deadline Date:</p>	<ul style="list-style-type: none"> • Alignment with the crop protection team and develop training module – By June 2019 • Develop new ‘HSE FOR ME’ training module for stakeholder training – June 2019 • Cluster or village level farmer and workers training on HSE FOR ME – In phase wise cover all by 2022 • Inspection / monitoring visit – at least twice in a crop cycle

Chemical Management	
<p>Benchmarks: HSE.11.1: To prevent unsafe exposure to hazardous chemicals and hazardous substances, appropriate accommodations shall be made for pregnant women and workers under the age of 18, as required by applicable laws or the provisions of the FLA Workplace Code, in a manner that does not unreasonably disadvantage workers.</p>	
Noncompliance in one farm	
<p>Findings/Noncompliance Explanation:</p>	<p>There was no awareness among farmers about the toxicity specification labels on the chemical/pesticide containers. In one farm, it was noted that the young worker would have frequent headache and giddiness as she would enter the net house within 5-10 minutes post pesticide spraying.</p> <p><u>Source:</u> workers interview</p>
<p>Company Action Plan:</p>	<p>The Company launched the initiative of ‘HSE FOR ME’ campaign to improve the awareness level among the farmers and workers, which will also cover chemical management. Syngenta field team plans to conduct multiple awareness sessions or trainings to sensitize them on the field safety standards. It will also cover the topics</p>

	<p>related to safe chemical management and standards to be maintained at farm level to protect the workers from safety hazards.</p> <p>Field monitoring shall be done regularly in all the farms by the field production team. Strong communication is imparted and farmers are encouraged not to allow the workers to enter the farms within 3-4 hours post spray. Farm boards were distributed recently to display in farm and suggested that the spraying and re-entry time after every spray should be mentioned.</p>
Deadline Date:	<ul style="list-style-type: none"> Cluster or village level farmers and workers training on HSE FOR ME – In phase wise cover all by 2022 Motivate the farmers and ensure the display of caution boards in the farms – Every season Inspection / monitoring visit – every visit to the farms by the field team

Compensation

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	C.1.1	Noncompliance	Farms 2
	C.1.2	In compliance	
	C.1.3	In compliance	
	C.1.4 (PR)	In compliance	
Minimum Wage/Fair Compensation	C.2.1	Noncompliance	Farm 2
	C.2.2	In compliance	
	C.2.3	In compliance	
	C.2.5 (PR)	In Progress	Farm 2
	C.2.6 (PR)	In compliance	
	C.3	N/A	
Farmer/Producer Income	C.4 (PR)	In compliance	
Wage Payment and Calculation	C.6	In compliance	
	C.7.1	Noncompliance	Farm 3
	C.7.2	In compliance	
	C.7.3 (PR)	In Progress	Farm 3
	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)	N/A	
	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)	N/A	
C.12.3	N/A	
C.12.4	N/A	
C.12.5	N/A	

Compensation Assessment Summary

General Compliance/Minimum Wage/Fair Compensation	
<p>Benchmarks:</p> <p>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> <p>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 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 about the legal minimum wage applicable to them.</p>	Noncompliance in one farm
<p>Findings/Noncompliance Explanation:</p>	<p>Wages were paid below legal minimum wages. Legal minimum wages applicable (Zone III) including special allowance for the period 01.07.2018 to 31.12.2018 is INR 214.53 per day. The workers were being paid INR 200.00 per day.</p> <p><u>Source:</u> Farmer, worker interviews, record review</p>
<p>Company Action Plan:</p>	<p>Syngenta in its internal monitoring noticed that few farmers pay around INR 200 to the workers and in addition to this, they also spend INR 20-30 per worker on transportation. Altogether, it costs around 220 – 230 per worker.</p> <p>According to suggestion by local stakeholders, this can be considered under minimum wage rate. However, Syngenta shall continue to motivate the farmers to comply with the wage payment equal to minimum wage rate. Field teams shall undertake frequent awareness sessions with the farmers and workers to disseminate the information on fair compensation benchmarks.</p> <p>Syngenta shall also engage with the local CSO/NGOs to help in creating awareness among the farmers and workers on fair compensation. Formal engagement shall be established by June 2019. Internal monitoring shall be conducted by the field team at least thrice in a crop cycle.</p>
<p>Deadline Date:</p>	<ul style="list-style-type: none"> Farmer awareness on minimum wage and fair compensation – Pre-season / mid-season meeting in every crop cycle. Engagement with NGO/CSO to create awareness among the farmers and workers – July -Dec2019 Internal monitoring – thrice in cycle

Wage Payment and Calculation	
<p>Benchmarks:</p> <p>C.7.1: All payments to workers, including hourly wages, piecework, fringe benefits and other incentives shall be calculated, recorded, and paid in a manner that is convenient to workers (e.g., in cash, by bank transfer or check).</p>	Noncompliance in one farm
<p>Findings/Noncompliance Explanation:</p>	<p>The wage payment recorded in one farm was inaccurate leading to discrepancy with worker information. Whereas the workers were being paid INR 220 (INR 200 as basic wages plus INR 20 for transportation), the records maintained by the farmer got signatures from workers against INR 215.</p> <p><u>Source:</u> Farmer, worker interviews, record review</p>
<p>Company Action Plan:</p>	<p>Syngenta understands the field challenges and conducted a review to understand the</p>

	<p>compliance concern – it was for multiple reasons like lack of understanding of the farmer, the negligence to maintain records on daily basis due to work pressure and other commitments and so on. Thus, Syngenta field team shall conduct a face to face training for the farmer in the said farm, and provide in-depth guidance on maintenance of accurate record. Syngenta team shall share the newly developed documentation kit with the farmer and explain the importance of filling accurate information under each element including attendance, age, advance payment, hours and worker acknowledgment</p>
Deadline Date:	<ul style="list-style-type: none"> • Initial visit and understanding of the situation at the farm level – June 2019 • Provide guidance, monitoring and verification of the records – three times in a crop cycle.

Worker Awareness	
<p>Benchmarks: 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.</p>	Noncompliance in all farms
<p>Findings/Noncompliance Explanation:</p>	<p>There was no effort made by Syngenta or seed organizers to inform workers about the legal information on wages and working hours.</p> <p><u>Source:</u> Worker interviews, record review</p>
<p>Company Action Plan:</p>	<p>Syngenta feels this is a systemic social issue and cannot be dived directly to address this. Syngenta started multiple efforts to address this issue like engagement with FLA on fair compensation pilot projects and got the favorable outcome on this. There is a need felt to engage in more long-term goals and outcomes to help achieve the desired result.</p> <p>Initially, the focus was kept in hot pepper farms in Maharashtra with an intention to expand the learnings and success stories in other farms in a phase wise manner. Under this project, Syngenta engages with local stakeholders to help them conduct awareness campaigns with farmers and workers including providing information on minimum wages.</p> <p>Syngenta plans to engage with an external agency to help support the project and influence the community at a larger level. The intention is to create mass awareness on fair wages, working hours and other legal information and encourage farmers to comply. Various communication tools such as poster, handouts, farmer manuals etc. shall be used during campaigns.</p>
Deadline Date:	<ul style="list-style-type: none"> • Formal engagement of NGO – July - Dec 2019 • Farmer and workers awareness – Every season • Distribution of communication tools – Every season

Overview - Farms vs. Non-compliances

Total number of Farms: 6

	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%	17%	0%	100%	0%	100%	
Farm No. 1	17	0	2	0	0	0	2	0	1	22
Farm No. 2	20	0	2	0	1	0	1	0	3	27
Farm No. 3	18	0	2	0	0	0	1	0	2	23
Farm No. 4	17	0	2	0	0	0	1	0	1	21
Farm No. 5	17	0	2	0	0	0	1	0	1	21
Farm No. 6	17	0	2	0	0	0	1	0	1	21
TOTAL	106	0	12	0	1	0	7	0	9	135