



[2019]

FAIR LABOR ASSOCIATION INDEPENDENT EXTERNAL MONITORING AGRICULTURAL REPORT

Company: Syngenta

Country: Morocco

Crop: Squash, Melon

Production Process: Pollination and harvesting

Assessment Location: Rabat/Kenitra/Meknes

Monitor: Control Union Morocco

Assessment Dates: 10-13 June 2019

Number of assessed farms: 3

Total area covered: 57 ha

Number of farmers interviewed: 3

Total number of workers: 129

Number of workers interviewed: 24

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.1.2 (PR)	In compliance	
	ER.1.3 (PR)	In progress	All Farms
	ER.2.1	In compliance	
	ER.2.1.1	In compliance	
Recruitment and Hiring	ER.3.1	Noncompliance	Farm 1
	ER.3.1.1	Noncompliance	Farm 1
	ER.3.1.2	Noncompliance	Farm 1
	ER.4	In compliance	
	ER.5.1	In compliance	
	ER.5.2	In compliance	
	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	
	ER.8.1	In compliance	
	ER.8.2	In compliance	
ER.8.3	In compliance		
Terms and Conditions	ER.9.1	In compliance	
	ER.9.2.1	In compliance	
	ER.9.2.2	In compliance	
	ER.9.2.3	In compliance	
	ER.9.3.1	In compliance	
	ER.9.3.2	In compliance	
	ER.9.3.3	In compliance	
	ER.10	In compliance	
	ER.11	In compliance	
	ER.12.1	N/A	
	ER.12.1.1	In compliance	
	ER.12.2	In compliance	
	ER.13.1	In compliance	
	ER.13.2	In compliance	
	ER.13.3	In compliance	
ER.13.4 (PR)	In compliance		
Administration	ER.14.1	In compliance	
	ER.14.2	In compliance	
	ER.15.1	N/A	
	ER.15.2	N/A	
	ER.15.2.1	N/A	
	ER.16.1	In compliance	
	ER.16.2	In compliance	
	ER.17.1	In compliance	
	ER.17.2	Risk of noncompliance	Farm 1 and 2
	ER.17.3	In compliance	
ER.17.4	In compliance		
Worker Involvement	ER.18.1	In compliance	
	ER.18.2	In compliance	

	ER.18.3 (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	Noncompliance	All Farms
	ER.20.4	Noncompliance	All Farms
	ER.20.5 (PR)	In progress	All Farms
	ER.20.6	Noncompliance	All Farms
	ER.20.7	Noncompliance	All Farms
	ER.20.8	Noncompliance	All Farms
	ER.20.9	Noncompliance	All Farms
	ER.20.10 (PR)	Not Initiated	All Farms
	ER.20.11	Noncompliance	All Farms
Training	ER.21	In compliance	
	ER.22.1 (PR)	Not Initiated	All Farms
	ER.22.1.1 (PR)	Not Initiated	All Farms
	ER.22.2 (PR)	Not Initiated	All Farms
	ER.23.1 (PR)	Not Initiated	All Farms
	ER.23.2 (PR)	Not Initiated	All Farms
HSE Management System	ER.24.1.	In compliance	
	ER.24.2	Noncompliance	All Farms
	ER.24.3	In compliance	
	ER.24.4	Noncompliance	All Farms
	ER.24.4.1	Noncompliance	All Farms
	ER.24.4.2	Noncompliance	All Farms
	ER.24.4.3	Noncompliance	All Farms
	ER.24.4.4	Noncompliance	All Farms
	ER.24.4.5	Noncompliance	All Farms
	ER.24.4.6	Noncompliance	All Farms
ER.24.5 (PR)	In progress	All Farms	
Grievance Procedures	ER.25.1	Noncompliance	All Farms
	ER.25.2	In compliance	
	ER.25.3	In compliance	
	ER.25.4	In compliance	

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.

**Noncompliance
in one farm**

**Findings/Noncompliance
Explanation:**

There is a lack of systematic verification of age at recruitment, as farmers face challenges in collecting documents proving the age of young workers.

No. 01

At one of the assessed farms, a few workers looked very young (below 15 years) and no document is kept by farmers to check their age, putting them at risk of using child labor.

Source: management and workers interview, observation, document review

Company Action Plan

Activity	<ol style="list-style-type: none"> 1. A recruitment procedure will be developed in order to be communicated and implemented in all production sites, with clear requirements on worker age verification according to Moroccan law, and also in accordance with fair labor requirements (e.g. : the need to provide and keep a proof of age as ID Card, birth certificate, family record book or any official document that can prove their age). 2. A training session around this policy/procedure will be provided to all the external production sites managers 3. Include all fair labor standard requirements to our already established internal monitoring system (IMS). IMS : a yearly mandatory assessment system for all external production (assessment, report, NC's, weaknesses, continuous improvements) <p>There are 3 external sites of production of Syngenta Morocco.</p>
Output indicators (targeted results)	<ol style="list-style-type: none"> 1. Copy of recruitment policy and procedure with a description of the age verification process. 2. Proof of training records of the three farmers and their supervisors. 3. Audit report and results / records of ranking and evaluation of farmers.
Timeline and Deadline Date	<ol style="list-style-type: none"> 1. May 2020 (written policy and procedure reviewed and agreed with farmers) 2. June 2020 (after realization of training session for all farmers) 3. June 2021
Input (budget/resources)	Human Resource (staff time), development of communication materials.
Responsible staff (title/department)	External Production Leader

Time Recording System	
<p>Benchmarks: ER.17.2: Accurate time records shall be maintained by employers, including overtime, breaks, and leave. If time recording systems are not part of the local practices or if smallholders are illiterate, rudimentary manual record on working days and working hours for each worker is acceptable.</p>	<p>Risk of Noncompliance in 2 farms</p>
<p>Findings/Noncompliance Explanation: No. 02</p>	<p>In two of the assessed farms, the time records are available but are lacking important information such as hours and overtime.</p> <p><u>Source:</u> document review</p>
Company Action Plan	
Activity	<ol style="list-style-type: none"> 1. Clarification of time records in hours and overtime records according to Moroccan law requirements within recruitment policy and procedures for agriculture sector. 2. Appointment of a responsible person (from the farm staff) in each external production site for the records and follow up of scorecards "carnet de pointage" that covers all the requirements related to; working hours ; overtime calculation ; payments ; bonuses, leaves.

	<ol style="list-style-type: none"> 3. Training for the appointed responsible for the three farms in both Moroccan and fair labor requirements. 4. Check and assessment during internal audit session (IMS)
Output indicators (targeted results)	<ol style="list-style-type: none"> 1. Copy of recruitment policy and procedures 2. Appointed responsible person list and correct scorecard (carnet de pointage) that is properly used. 3. Training records 4. Audit report and non-conformities follow up (01 audit / farm/year, systematically)
Timeline and Deadline Date	<ol style="list-style-type: none"> 1. May 2020 2. June 2020 3. June 2020 4. June 2021
Input (budget/resources)	Human Resource (staff time), development of communication materials; training related cost (Fees, travel, refreshment, accommodation etc.)
Responsible staff (title/department)	External Productions Leader

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.20.3: Supervisors shall be trained on the proper handling of disciplinary rules and practices.

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.

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.20.9: Workers must sign all written records of disciplinary action against them.

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.

**Noncompliance
in all farms**

Findings/Noncompliance Explanation:

There is no clear disciplinary system/procedure communicated to the workers (what leads to disciplinary measures, when workers can receive verbal/written warning, what actions to take and when, etc). Supervisors are not trained on the proper handling of disciplinary rules and practices, and there are no records of disciplinary actions taken.

No. 03

Source: interviews and documentation review

Company Action Plan

Activity

1. Implementing disciplinary procedure with clear rules and measures to be taken in different situations. The grievance, disciplinary and harassment/abuse procedure can be dealt with together, so the action is about developing, together with the growers, procedures that cover all three subjects.

	<ol style="list-style-type: none"> 2. Training sessions (once a year) to provide suitable, updated material and experience for workers' supervisors to allow them handle situations according to established practices. 3. Follow up and reports including disciplinary actions taken.
Output indicators (targeted results)	<ol style="list-style-type: none"> 1. Copy of disciplinary procedure. 2. All three farms' supervisors staff training records communicate rules to all workers and keep attendance records, rules posted in suitable workplaces in farms. 3. disciplinary reports and action taken with proof.
Timeline and Deadline Date	<ol style="list-style-type: none"> 1. June 2020 2. June 2020 3. June 2021 (as results of audit check)
Input (budget/resources)	<p>Get guidelines from Government Labor Office/union agreements.</p> <p>Expenses related to participatory procedure development sessions with farmers and labor trainings such as travel, accommodation, staff time, communication materials.</p>
Responsible staff (title/department)	External Productions Leader

HSE Management System	
<p>Benchmarks:</p> <p><i>ER.24.2: Employers shall have a clearly written policy with all relevant HSE procedures aimed, at a minimum, at compliance with legal minimum health, safety, and environmental standards, regulations and procedures. For small farms with informal labor structures, written policies can take the form of basic HSE documents or information.</i></p> <p><i>ER.24.3: Employers shall have a designated responsible person for HSE issues on the farm. For small farms, this could be the responsibility of the farmer directly.</i></p> <p><i>ER.24.4: The health, safety, and environmental policies shall contain the framework for a comprehensive health, safety, and environmental management system within which the following are clear and regularly tested and reviewed:</i></p> <p><i>ER.24.4.1: employers' responsibilities,</i></p> <p><i>ER.24.4.2: workers' rights and duties,</i></p> <p><i>ER.24.4.3: responsibilities of designated personnel,</i></p> <p><i>ER.24.4.4: procedures that enable workers to raise health, safety, and environmental concerns</i></p> <p><i>ER.24.4.5: procedures for reporting death, injury, illness and other health and safety issues (for instance, near-miss accidents) and environmental emergencies, and,</i></p> <p><i>ER.24.4.6: protection to workers who allege health, safety, and environmental violations.</i></p>	<p>Noncompliance in all farms</p>
<p>Findings/Noncompliance Explanation:</p> <p>No. 04</p>	<p>HSE instructions are available and displayed by the company to all workers, but there is no clearly established HSE policies and procedures at the farm level. The policies and procedures shall contain the following :</p> <ul style="list-style-type: none"> • commitment to ensure all necessary measures concerning the respect of the hygiene of the health and safety of the workers and respect for the environment; • responsibilities of employers, duties of workers, responsibilities of designated personnel; • procedures that enable workers to raise health, safety, and environmental concerns;

	<ul style="list-style-type: none"> procedures for reporting death, injury, illness and other health and safety issues (for instance, near-miss accidents) and environmental emergencies; protection to workers who allege health, safety, and environmental violations. <p>Source: interviews and documentation review</p>
Company Action Plan	
Activity	<ol style="list-style-type: none"> Develop a HSE policy related to production process and operations in external sites Develop HSE procedures that covers : <ul style="list-style-type: none"> responsibilities of employers, duties of workers, responsibilities of designated personnel; workers health, safety, and environmental concerns; reporting death, injury, illness and other health and safety issues (for instance, near-miss accidents) and environmental emergencies; Protection to workers who allege health, safety, and environmental violations. Provide HSE training according to HSE policy and procedures
Output indicators (targeted results)	<ol style="list-style-type: none"> Copy of HSE policy and procedures Training records: all 3farms; 01session for supervisors& farmers. 01 sessions for all the workers
Timeline and Deadline Date	<ol style="list-style-type: none"> April 2020 June 2021
Input (budget/resources)	Human Resource (staff time), development of communication materials; training related cost (Fees, travel, refreshment, accommodation etc.)
Responsible staff (title/department)	External productions leader

Grievance Procedures	
Benchmarks: <i>ER.25.1: Employers shall have in place a procedure that allows a direct settlement of the grievance by the worker and the immediate supervisor. Where this is inappropriate or has failed, there should be additional options for the worker to have the grievance considered at one or more steps, depending on the nature of the grievance and the structure and size of the facility.</i>	Noncompliance in all farms
Findings/Noncompliance Explanation: No. 05	<p>Syngenta has set up a toll-free number, which is available to all workers in case they have any grievance and would like to raise them to the company (Syngenta grievance mechanism).</p> <p>However, at the farm level, there is no grievance procedure detailing how to settle grievances by the workers and the immediate supervisors. Syngenta could help establish such farm level grievance mechanism so that workers can use this first level of grievance system before reaching Syngenta in case the farm level one did not succeed to solve the issue.</p>

Source: Interviews and documentation review

Company Action Plan

Activity	<ol style="list-style-type: none"> 1. Implementing grievance procedure in production sites according to Syngenta grievance mechanism already existing. The grievance, disciplinary and harassment/abuse procedure can be dealt with together, so the action is about developing, together with the growers, procedures that cover all three subjects 2. communication and information sharing with all the workers on the production sites
Output indicators (targeted results)	<ol style="list-style-type: none"> 1. Grievance procedure at the farm level 2. Records as proof that every worker has been informed with grievance procedure and aware of how to deal with such potential situations
Timeline and Deadline Date	<ol style="list-style-type: none"> 1. June (in progress by now) 2. Along 2020 (from January 2020 – to June 2021)
Input (budget/resources)	Human Resource (staff time), development of communication materials; training related cost (Fees, travel, refreshment, accommodation etc.)
Responsible staff (title/department)	External productions leader

Harassment or Abuse

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	H/A.1.1	In compliance	
	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.12	Noncompliance	All Farms
	H/A.13	Risk of Noncompliance	All Farms
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	

	H/A.9.5 (PR)	Not Initiated	All Farms
Security Practices	H/A.10	In compliance	
	H/A.10.1	In compliance	
	H/A.10.2	In compliance	
	H/A.11	In compliance	

Harassment or Abuse Assessment Summary

Discipline		
<p>Benchmarks:</p> <p><i>H/A.12: Employers shall have a system to discipline supervisors, managers or workers who engage in any physical, sexual, psychological or verbal violence, harassment or abuse, through measures such as compulsory counselling, warnings, demotions, and terminations or a combination thereof regardless of whether such action was intended as a means to maintain labor discipline.</i></p>		Noncompliance in all farms
<p><i>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</i></p>		Risk of Noncompliance in all farms
<p>Findings/Noncompliance Explanation:</p> <p>No. 06</p>	<p>On the assessed farms, there is no procedure explaining the measures to be taken against abusive employees / supervisors / managers.</p> <p>Employees are informed about the internal rules of work regarding sexual harassment, but are not trained on the measures that will be applied when reporting cases of harassment.</p> <p><u>Source:</u> Interviews and documentation review</p>	
Company Action Plan		
<p>Activity</p>	<ol style="list-style-type: none"> Implementing procedures that covers: abuses behavior, physical, mental or sexual harassment for the external production sites according to Syngenta ethical policy and its requirements for compliance <p>The grievance, disciplinary and harassment/abuse procedure can be dealt with together, so the action is about developing, together with the growers, procedures that cover all three subjects.</p> <ol style="list-style-type: none"> Communication and information sharing with all the workers on the production sites 	
<p>Output indicators (targeted results)</p>	<ol style="list-style-type: none"> Procedure for abusive and ethical non-compliance Records as proof that every worker and supervisor has been informed with the procedure and aware of how to deal with such potential situations 	
<p>Timeline and Deadline Date</p>	<ol style="list-style-type: none"> June 2020 June 2020 <p>Every case will be checked and reported in Syngenta records within the IMS (Internal Monitoring System)</p>	
<p>Input (budget/resources)</p>	<p>Human Resource (staff time), development of communication materials; training related cost (Fees, travel, refreshment, accommodation etc.)</p>	
<p>Responsible staff (title/department)</p>	<p>External productions leader</p>	

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	
	CL.4.2 (PR)	In compliance	
Young Workers	CL.5	In compliance	
	CL.6.1	In compliance	
	CL.6.2	Noncompliance	All Farms
	CL.7	In compliance	
Apprenticeships and Vocational Training	CL.8.1	In compliance	
	CL.8.2	In compliance	
Children on Premises	CL.9	In compliance	
Removal and Rehabilitation of Child Laborers	CL.10.1	Noncompliance	All Farms
	CL.10.2 (PR)	In compliance	

Child Labor Assessment Summary

Young Workers	
Benchmarks CL.6.2: Employers shall maintain a list of all young workers, their entry dates, proof of age and description of their assignment.	
Noncompliance in all farms	
Findings/Noncompliance Explanation:	A list of workers is established at the end of every work day, but the young workers are not distinguished amongst the other workers.
No. 07	<u>Source:</u> Documentation Check (list of workers) and Interviews
Company Action Plan	
Activity	The below requirements will be included in the recruitment procedure (see action plan for Non-conformity N° 01) with specific training module for young workers (working hours, entitlements for breaks, leaves, task that they can do is different than adults).
Output indicators (targeted results)	<ol style="list-style-type: none"> Copy of recruitment policy with a description of the age verification process. Proof of training records of all farmers and supervisors. Audit report and results / records of ranking and evaluation of farmers.
Timeline and Deadline Date	<ol style="list-style-type: none"> May 2020 June 2020 (after realization of training session for all farmers) June 2021
Input (budget/resources)	Human Resource (staff time), development of communication materials; training

	related cost (Fees, travel, refreshment, accommodation etc.)
Responsible staff (title/department)	External Productions Leader

Removal and Rehabilitation of Child Laborers	
<p>Benchmarks</p> <p><i>CL.10.1: If a child laborer is found working on a farm, all relevant downstream suppliers, including the participating company, shall immediately assess the situation at the child's household level and shall engage with relevant stakeholders to find a sustainable remediation solution that is in the best interest of the child.</i></p>	
Noncompliance in all farms	
Findings/Noncompliance Explanation:	There is no child labor removal and rehabilitation system/procedure in place. The system /procedures shall include the assessment of the situation of child labor at the house-hold level.
No. 08	<u>Source:</u> Documentation check, interviews with the management.
Company Action Plan	
Activity	Syngenta will issue guidelines for out IMS auditor to follow should a child be found working on one of the farms.
Output indicators (targeted results)	<ol style="list-style-type: none"> Child labor remediation guidelines. Training session on this topic for farmers, supervisors and IMS auditors
Timeline and Deadline Date	<ol style="list-style-type: none"> May 2020 June 2020
Input (budget/resources)	Human Resource (staff time), development of communication materials; training related cost (Fees, travel, refreshment, accommodation etc.)
Responsible staff (title/department)	<ol style="list-style-type: none"> EAME fair labor coordinator External productions leader

Health, Safety and Environment

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	HSE.1.	In compliance	
Document Maintenance, Permits and Certificates	HSE.2	Noncompliance	All Farms
	HSE.3.1	In compliance	
	HSE.3.2	In compliance	
	HSE.4	Noncompliance	All Farms
Evacuation Requirements and Procedure	HSE.5.1	Noncompliance	Farm 1
	HSE.5.2	Noncompliance	Farm 1
Safety Equipment and First Aid	HSE.6.1	Noncompliance	Farm 3
	HSE.6.2	Noncompliance	All Farms
	HSE.6.3	In compliance	

Personal Protective Equipment	HSE.7	Noncompliance	All Farms
	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	In compliance	
	HSE.11.2	In compliance	
Protection Reproductive Health	HSE.12.1	Risk of noncompliance	All Farms
	HSE.12.2	In compliance	
Infrastructure	HSE.13	N/A	
	HSE.17.1	In compliance	
	HSE.17.2	In compliance	
	HSE.18	N/A	
	HSE.19	N/A	
	HSE.20	N/A	
	HSE.21	In compliance	
	HSE.22	In compliance	
Machinery Safety	HSE.14.1	In compliance	
	HSE.14.2	In compliance	
	HSE.14.3	In compliance	
	HSE.14.4	In compliance	
Ergonomics and Medical Facilities	HSE.15.1 (PR)	Not Initiated	All Farms
	HSE.15.2	In compliance	
	HSE.16.1	In compliance	
	HSE.16.2	In compliance	

HSE Assessment Summary

Document Maintenance, Permits and Certificates

Benchmarks:

HSE.2: All documents required to be available to workers and farmers by applicable laws (such as health and safety policies, MSDS, etc.) shall be made available in the prescribed manner and in the local language or language spoken by the workers if different from the local language. If the workers are illiterate, efforts shall be made to provide pictorials of the required documents that the workers can understand.

HSE.4: Employers shall at all times be in possession of all legally required and valid permits and certificates related to health, safety, and environmental issues, such as those related to the purchase and storage of chemicals, fire safety inspections, inspection of machinery, and (chemical) waste disposal, where relevant.

**Noncompliance
in all farms**

**Findings/Noncompliance
Explanation:**

Workers in charge of chemical application are not subject to aptitude control by the doctor as it is required by local regulations

No. 09

A sufficient number of workers not trained on the use of fire extinguishers.

Source: Interviews and documentation check

Company Action Plan

Activity

The below noncompliance will be treated within the action plan for non-compliance N° 04:

- Identify the spraying team in a list
- Apply medical check for spraying team members

**Output indicators
(targeted results)**

1. Spraying team list
2. Medical control aptitude for **every member** within spraying team (medical check/year).

	<ol style="list-style-type: none"> 3. Extinguisher positioning map of the production sites (3). 4. Yearly extinguishers training for security team / yearly check for all distinguishers.
Timeline and Deadline Date	<ol style="list-style-type: none"> 1. June 2020 2. September 2020 3. September 2020 4. September 2020
Input (budget/resources)	Human Resource (staff time), development of communication materials; training related cost (Fees, travel, refreshment, accommodation etc.)
Responsible staff (title/department)	External Productions leader

Evacuation Requirements and Procedure	
<p>Benchmarks:</p> <p><i>HSE.5.1: All applicable, legally required elements of safe evacuation (e.g. posting of evacuation plans, installation and maintenance of an alarm and emergency lighting systems) shall be complied with. Wherever applicable such as in living quarters or/and enclosed areas, or in case of fires, animal evacuation procedures shall be created and complied with.</i></p> <p><i>HSE.5.2: Where appropriate, workers shall be trained in evacuation procedures at least once per year.</i></p>	Noncompliance in one farm
<p>Findings/Noncompliance Explanation:</p> <p>No. 10</p>	<p>In one of the assessed farm (melon greenhouse), there is no fire fighting and fire evacuation procedure. A meeting point has been designated at the exit of the greenhouse, but the evacuation plan is not posted for workers and visitors (emergency exit, location of fire extinguishers ...). In addition, the evacuation procedure must be regularly tested.</p> <p><u>Source:</u> observation; interview</p>
Company Action Plan	
Activity	Evacuation procedures and fire-fighting instruction will be developed and disseminated (See action plan for non- compliance N° 04)
Output indicators (targeted results)	<ol style="list-style-type: none"> 1. Evacuation procedure test records. 2. Extinguishers positioning map (see non-compliance N°09)
Timeline and Deadline Date	<ol style="list-style-type: none"> 1. April 2020 Procedure; June 2020 Training 2. June 2020
Input (budget/resources)	Human Resource (staff time), development of communication materials; training related cost (Fees, travel, refreshment, accommodation etc.)
Responsible staff (title/department)	External productions leader

Safety Equipment and First Aid	
<p>Benchmarks:</p> <p><i>HSE.6.1: All safety and medical equipment (e.g. first aid kits) shall be available, maintained and stocked as prescribed, and easily accessible to workers.</i></p> <p><i>HSE.6.2: Sufficient number of workers shall be trained in first aid and fire safety.</i></p>	Noncompliance In all farms

Findings/Noncompliance Explanation:	In one of the assessed farms, the first aids kits are available, but are not close to the fields (available about 5 minutes by car). In all the farms, there are no first aid and fire-fighting trainings provided to a sufficient number of workers.
No. 11	<u>Source:</u> Document check and Interviews
Company Action Plan	
Activity	<ol style="list-style-type: none"> 1. Generalize the availability of the first aids kits close to working team 2. Supervisors training session (all 3 farms supervisors) about HSE requirements and importance to hold close first aids kits around workers team
Output indicators (targeted results)	<ol style="list-style-type: none"> 1. First aid kits invoice and reception paper from production sites 2. Training records
Timeline and Deadline Date	April 2020
Input (budget/resources)	Human Resource (staff time), development of communication materials; training related cost (Fees, travel, refreshment, accommodation etc.)
Responsible staff (title/department)	External productions leader

Personal Protective Equipment	
<p>Benchmarks: <i>HSE.7: Workers shall be provided at no cost with all the appropriate and necessary personal protective equipment (e.g. gloves, eye protection, hat, boots, protective mask, hearing protection) to effectively prevent unsafe exposure (e.g. inhalation or contact with chemicals, noise, dust) to health and safety hazards, including chemical waste.</i></p>	
Noncompliance in all farms	
Findings/Noncompliance Explanation:	Several workers were observed with injured hands because of working with hands with no protection. Not all workers are provided with gloves, and often, the given gloves don't fit the needed size. According to interviews, the workers bring their own gloves because the sizes do not suit them.
No. 12	<u>Source:</u> Documentation, observation, interviews
Company Action Plan	
Activity	Providing the suitable PPE (Personal Protection Equipment) as needed according to the operation nature (hats & gloves).
Output indicators (targeted results)	Available PPE for all workers
Timeline and Deadline Date	March 2020
Input (budget/resources)	PPE (Personal Protection Equipment) Budget

Responsible staff (title/department)	External productions leader
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Protection Reproductive Health

Benchmarks: <i>HSE.12.1: Employers shall ensure that women are not engaged in work that constitutes a substantial risk to their reproductive health.</i>	Risk of Noncompliance in all farms
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Findings/Noncompliance Explanation: No. 13	No women were found working with hazardous products, but there is no policy or procedure established to ensure that women will not be engaged in work that constitutes a substantial risk to their reproductive health. <u>Source:</u> Observation; Documentation check; interviews
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Company Action Plan

Activity	See HSE action plan for non-compliance N°04
Output indicators (targeted results)	Chemical and heavy weight handling, prohibition according to requirement of HSE concerning (age, reproductive health)
Timeline and Deadline Date	June 2020
Input (budget/resources)	Human Resource (staff time), development of communication materials; training related cost (Fees, travel, refreshment, accommodation etc.)
Responsible staff (title/department)	External productions leader

Hours of Work

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	HOW.1.1	In compliance	
	HOW.1.2	In compliance	
	HOW.1.3	Noncompliance	Farm 2
	HOW.1.4	In compliance	
	HOW.17.1	In compliance	
	HOW.17.2	In compliance	
Rest Day	HOW.2	In compliance	
Meal and Rest Breaks	HOW.3	In compliance	
Protected Workers	HOW.4.1	In compliance	
	HOW.4.2	Noncompliance	All Farms
	HOW.4.3	In compliance	
Overtime	HOW.5.1	In compliance	
	HOW.5.2	In compliance	

	HOW.6.1	In compliance	
	HOW.6.2	In compliance	
	HOW.6.3	In compliance	
	HOW.7	In compliance	
Public Holidays and Leave	HOW.8.1	In compliance	
	HOW.8.2	In compliance	
	HOW.8.3	In compliance	
	HOW.9	In compliance	
	HOW.10.1	In compliance	
	HOW.10.2 (PR)	In compliance	
	HOW.11	In compliance	
	HOW.12.1	In compliance	
	HOW.12.2	In compliance	
	HOW.13	In compliance	
	HOW.14	In compliance	
	HOW.15	In compliance	
	HOW.16	In compliance	

Hours of Work Assessment Summary

General Compliance	
<p>Benchmarks: <i>How.1.3: Other than in exceptional circumstances or during short-term seasonal work as described under HOW.2, the total weekly work hours (regular work hours plus overtime) shall not exceed 60 hours per week or the legal limit, whichever is lower. The upper limit during a working day shall not exceed 12 hours.</i></p>	
Noncompliance in one farm	
<p>Findings/Noncompliance Explanation:</p> <p>No. 14</p>	<p>In one of the assessed farms, some workers exceeded the maximum hours of work per day which is 10 hours / day. Following the verification of the records of the hours worked during the past month, it was identified that the durations reached 14 hours / days 3 times.</p> <p><u>Source:</u> Documentation check; interviews</p>
Company Action Plan	
Activity	<ul style="list-style-type: none"> Ensure that farmers agree and check that maximum hours is 10, with occasional exception of 12hours according to Moroccan labor law Establish a procedure that defines clearly work hours managements and requirement for enlarging such a matter, with all conditions highlighted within Communication and awareness session with concerned farm managers
Output indicators (targeted results)	<ol style="list-style-type: none"> Master roll (carnet de pointage) , overtime records etc. showing evidence of compliance with hours of work requirements Work hour procedure Awareness (training session)
Timeline and Deadline Date	<ol style="list-style-type: none"> September 2020 May 2020 May 2020
Input (budget/resources)	Human Resource (staff time), development of communication materials; training related cost (Fees, travel, refreshment, accommodation etc.)
Responsible staff (title/department)	External productions leader

Protected Workers (pregnant or nursing women, young workers)

Benchmarks:

HOW.4.2: Employers shall maintain a list of all pregnant, nursing women and young workers who are subject to special protection regarding working hours and guarantee compliance with special legal provisions.

**Noncompliance
in all farms**

**Findings/Noncompliance
Explanation:**

The workers are registered every day, but the young workers are not identified in a separate list. However, the farmers are aware of the necessary special protection to provide to them (no hazardous activity for young workers, volunteer overtimes, etc.)

No. 15

Source: Documentation check and interviews

Company Action Plan

Activity

See action plan for noncompliance N° 07

**Output indicators
(targeted results)**

- Copy of recruitment policy with a description of the age verification process
- Proof of training records of all farmers and their recruitment responsible
- Audit report and results / records of ranking and evaluation of farmers(once a year)

**Timeline and Deadline
Date**

1. May 2020
2. June 2020 (after realization of training session for all farmers)
3. June 2021

Input (budget/resources)

Human Resource (staff time), development of communication materials; training related cost (Fees, travel, refreshment, accommodation etc.)

**Responsible staff
(title/department)**

External productions leader

Compensation

Compliance Status

Section	Benchmark	Compliance status	Farms
General Compliance	C.1.1	Noncompliance	Farm 1, 2
	C.1.2	In compliance	
	C.1.3	In compliance	
	C.1.4	In compliance	
Minimum Wage/Fair Compensation	C.2.1	In compliance	
	C.2.2	In compliance	
	C.2.3	In compliance	
	C.2.4 (PR)	Not to be answered by monitors. The FLA is working on analysis the situation based on real wage data collected during IEMs.	
	C.2.5 (PR)	In compliance	
	C.2.6 (PR)	Not Initiated	All Farms
	C.3	In compliance	
	C.5	In compliance	

Farmer/Producer Income	C.4	In compliance	
Wage Payment and Calculation	C.6	In compliance	
	C.7.1	In compliance	
	C.7.2	In compliance	
	C.7.3	In compliance	
	C.7.4	Noncompliance	All Farms
	C.7.5	In compliance	
	C.8.1	Noncompliance	Farm 1, 2
	C.8.2	Noncompliance	All Farms
	C.8.3	Noncompliance	All Farms
	C.8.4	Noncompliance	All Farms
	C.9	Noncompliance	All Farms
	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	In compliance	
	C.13	In compliance	
Fringe Benefits	C.12.1	In compliance	
	C.12.2	In compliance	
	C.12.3	In compliance	
	C.12.4	In compliance	
	C.12.5	In compliance	

Compensation Assessment Summary

General Compliance / Minimum Wage	
<p>Benchmarks:</p> <p><i>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.</i></p>	Noncompliance in two farms
<p>Findings/Noncompliance Explanation:</p> <p>No. 16</p> <p>The minimum wage as per law is not respected in one of the assessed farm, where workers get 60 Dh / day instead of 69,73 Dh / day. The farmer declared that it is the salary paid in the region for a long time (prevailing wage), and he has aligned with everybody's practice.</p> <p>Additionally, in two of the assessed farms, overtime is not paid as premium as per the local law (article NO 201). As per local law for agricultural activities, overtime should be paid an additional 25% between 5 am and 8 pm, and of 50% if they are made between 8 pm and 5 am.</p> <p><u>Source:</u> Documentation check and interviews</p>	
Company Action Plan	
Activity	This non-compliance will be addressed within the action plan of non-compliance N°02
Output indicators (targeted results)	<ul style="list-style-type: none"> • Payment check through "carnet de pointage" during the IMS monitoring evaluations • Communicating the legal minimum wage and overtime premium to every farm manager at the beginning of each production season • Make sure of applying the work hours procedures and minimum wage (see

	<p>noncompliance N°15</p> <ul style="list-style-type: none"> • Visit and verification report
Timeline and Deadline Date	<ol style="list-style-type: none"> 1. September 2020 2. Avril 2020 3. May 2020 4. September 2021
Input (budget/resources)	Human Resource (staff time), development of communication materials; training related cost (Fees, travel, refreshment, accommodation etc.)
Responsible staff (title/department)	External productions leader

Wage Payment and Calculation	
<p>Benchmarks:</p> <p>C.7.4: Employers shall provide workers a pay statement each pay period and not less frequently than once a month, which shall show:</p> <ul style="list-style-type: none"> • earned wages, • wage calculations, • total number of hours worked, • regular and overtime pay, • bonuses, • all deductions, and • final total wage. <p>The payment statement shall be signed and agreed by the worker. For farms with informal labor structures, and where the illiteracy rate is high, proof of payment may be in the form of alternative means (such as using a witness or affixing a thumb print).</p> <p>C.8.1: Employers shall compensate workers for all hours worked.</p> <p>C.8.2: Employers shall comply with all applicable laws, regulations and procedures governing the payment of premium rates for work on holidays, rest days, and overtime. There might however be specific working schemes voluntarily agreed by the workers to work on holidays and rest days for short-term seasonal work, which would make this provision not applicable.</p> <p>C.8.3: Workers shall be informed in writing or orally where necessary, in language(s) spoken by workers, about overtime wage rates prior to undertaking overtime.</p> <p>C.8.4: Unless workers have voluntarily agreed to other arrangements, in countries where there is no legally established overtime premium, employees shall be compensated for overtime hours at the prevailing sectoral rate, or at the internationally recognized overtime rate, of 150% on workdays and 200% on Sundays and holidays.</p> <p>C.9: All legally mandated deductions for taxes, social insurance, or other purposes shall be deposited each pay period in the legally defined account or transmitted to the legally defined agency. Employers shall not hold over any of these funds from one pay period to the other unless the law specifies that deposits are to be made less frequently than pay periods (e.g. monthly deposits, weekly pay). If the law does not specify, then deposits shall be made before the next pay period in all cases.</p>	<p>Noncompliance in all farms</p>
<p>Findings/Noncompliance Explanation:</p> <p>No. 17</p>	<p>The pay statement are not provided to the workers, and there is a lack of justification of payment to the CNSS (the CNSS manages the only mandatory social security scheme of a general nature in force in Morocco).</p> <p>To be noted that the rights of the CNSS (Caisse Nationale de Sécurité Sociale) must not be deducted from the net salary (the net salary can in no case be less than the statutory minimum wage).</p> <p><u>Source:</u> Documentation check</p>
Company Action Plan	
<p>Activity</p>	<p>In response to this noncompliance, the action plan will be implemented according to a long term chronological schedule for the next coming years :</p> <ol style="list-style-type: none"> 1. Information 2. Training & workshop 3. Policy & procedure 4. CNSS affiliation for the three farms

	5. Control & check
Output indicators (targeted results)	<ol style="list-style-type: none"> 1. Training & workshop records 2. Copy of policy and procedures 3. CNSS affiliation for the three farms 4. Audit report and non-conformities follow-up
Timeline and Deadline Date	<ol style="list-style-type: none"> 1. Nov 2020 2. September 2021 3. September 2022 4. September 2023
Input (budget/resources)	Human Resource (staff time), development of communication materials; training related cost (Fees, travel, refreshment, accommodation etc.)
Responsible staff (title/department)	External productions leader

Overview - Farms vs. Non-compliances

Total number of Farms:3

	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 Noncompliance or Risk of Noncompliance	100%	0%	100%	0%	100%	100%	100%	100%	100%	
Farm No. 1	23	0	2	0	2	0	7	1	7	42
Farm No. 2	19	0	2	0	2	0	5	2	7	37
Farm No. 3	18	0	2	0	2	0	6	1	5	34
TOTAL	60	0	6	0	6	0	18	4	19	113