COMPANY: Syngenta
COUNTRY: Thailand
PROVINCE: Pobpra
MONITOR: Global Standards
AUDIT DATE: 18-20 February 2016
PRODUCTS: Corn
NUMBER OF WORKERS: 120
NUMBER OF WORKERS INTERVIEWED: 40
NUMBER OF FARMS VISITED: 16
TOTAL AREA COVERED IN AUDIT:
PROCESSES: Harvesting

IEM reference report:
- SYN Pobhra Corn 2013

Context: Verification visits are conducted in villages and on crops where previous assessments have taken place. Data is collected by conducting interviews, observations and record reviews on four levels: (1) Syngenta Internal Monitoring System (IMS) level, (2) growers in the verified villages, (3) workers in the verified growers’ seed plots and (4) other influential stakeholders at the community level.

To view more about the FLA’s work with Syngenta, please visit the FLA website here.
# Non-compliances Overview and Table of Content

## 1. Code Awareness

### GEN 1
Establish and articulate clear, written workplace standards. Formally convey those standards to Company Growers as well as to supply chain organizers.

### GEN 2
Ensure that all Company growers, as well as supply chain Organizers, inform their workers about the workplace standards orally and through the posting of standards in prominent places in the local languages spoken by workers. Company must undertake other efforts to educate workers about the standards on a regular basis.

### GEN 3
Develop a secure communications channel, in a manner appropriate to the culture and situation, to enable Company employees, supervisors and employees of supply chain organizers to report to the Company on noncompliance with the workplace standards, with security that they shall not be punished or prejudiced for doing so.

### IEV Findings (2015)

## 3. Child Labor

### 2013 IEM Findings

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General Compliance Child Labor

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## Code Awareness

### 2013 IEM Findings

**GEN 1:**
The company has provided information related to the Company Code of Conduct (COC) in the grower agreements. Although it is not clear what percentage of growers are trained, some growers attended the training on the COC at the head office in their province. However, field supervisors, growers, and seed organizers were only aware of the Code elements related to child labor and health and safety (H&S); they were not aware of other elements of the COC.

### Company Action Plan

Syngenta plans to provide training to the following:
- all field supervisors,
- 50% of the growers (total number of growers in Pobpra area is 650)
- one grower leader.

These trainings include:
- A training on safe chemical usage by Syngenta Crop Protection Experts;
- A training on the nine Code elements by an FLA expert;
- A training on first aid for fieldwork by a relevant health expert.

**GEN 2:**
The COC was posted in Thai in many of the farms. However, farm workers, who were mainly Burmese, showed no awareness of the COC. Burmese workers do not read Thai and some admitted being illiterate in their own language. Growers appear to be making little effort towards educating their workers on the COC. The growers themselves are only aware of key elements, such as child labor and H&S.

Syngenta staff had no local language capabilities therefore could not communicate with the Burmese migrant workers employed in the North. Local field officers also were not conversant in Burmese.

### Company Action Plan

1. Syngenta will provide posters on safe chemical usage, triple rinse technique and the nine Code elements in Burmese.
2. Syngenta will organize workers’ meetings in each village at the beginning of the season, which will be conducted in local language, in order to educate the workers on the Company’s COC.
3. Syngenta will distribute information, education and communication (IEC) materials on code awareness to the workers at farm level.
4. Syngenta will organize poster campaigns in the local language at key places in the production villages.

**GEN 3:**
While there is a communication channel for reports (Syngenta’s telephone number was posted on the COC poster), it is only available in Thai; therefore, the channel is unhelpful to workers who do not speak Thai, such as migrant workers from Burma. Additionally, this poster was not found on many farms. There are no records of any grievances at the Internal Monitoring System (IMS) Center which is located at Syngenta’s local office in Lopburi, or anywhere else. Neither growers nor workers were aware of this communication channel.

### Company Action Plan

1. Syngenta will develop a secure communications channel for the growers, workers, and supervisor of the company to report on noncompliance directly to the IMS center. The IMS center has the capacity to report in the worker’s local language (Burmese).
2. Syngenta will develop a secure communication channel accompanied by a non-retaliation policy. Through the new channels, workers will be encouraged to report complaints to the FLA manager, the production leader or the grower leader. If required, the FLA manager will investigate the complaints and discuss with the respective growers on remedial solutions. If there is recurrence of the complaint, the FLA manager will seek assistance from Syngenta senior officials.

3. The FLA manager, production manager, grower leader and trainers will inform growers and workers on the grievance procedure during the COC training sessions, in their local language: Thai for growers and Burmese for workers.

4. Syngenta will develop a bulletin board to display the FLA program manager’s telephone number, Syngenta’s telephone number, and emergency telephone numbers in both Thai and Burmese.

5. A suggestion box will be kept at the grower leader’s house which can be opened by the FLA manager or the production manager for further actions.

**Deadline Date:** May 30, 2017

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### IEV Finding (2015)

As per the action plan, Syngenta provided training on the COC to growers in the pre-season meeting. The training was conducted in a community hall at the Sor-Or Sub-District, which was easily accessible by all growers. The training was for growers only; workers did not have a chance to attend the training. Based on Syngenta staff interviews, Syngenta is developing a training program for workers, particularly for Burmese and Karen workers. The program will be conducted in the local language in cooperation with a Burmese teacher from a migrant school who will translate the code elements into Burmese. However, it is not yet defined when the program will start.

Interviewed growers showed awareness of some code elements, such as child labor and health and safety, but little awareness of other code elements.

Based on IMS interview, Syngenta provided internal training to field supervisors and IMS staff. However, assessors could not confirm whether this training included all staff, such as field staff.

At the field level, Syngenta posted workplace standards documents in areas that both growers and workers could easily access, such as at the seed organizer’s house, schools, and the local hospitals. However, 95% of the workers are migrant workers from Myanmar, while 5% are Thais who are ethnic Karen. The majority of migrant workers are illiterate in Thai with only some ethnic Karen who could speak and read Thai. As the posters were in Thai, very few, estimated at 5%, of the workers have the ability to understand the information on the posters. In addition, the verification team did not find information on the Code in some farm locations. Growers reported that Syngenta provided COC documents and a first aid kit two years ago; maintenance of this program was not evident.

Syngenta provides a grievance channel for both growers and workers to report non-compliances; this is in the form of telephone numbers for the Syngenta local office and a direct line to the FLA’s program manager. However, based on IMS interview, Syngenta does not have a channel of communication for Burmese workers who do not speak Thai; the current channel provided is only available in Thai and English. Thai migrant workers were not aware of the existence of a suggestion box or any other means to file their complaints. Overall, less than half of workers interviewed had any knowledge of the existence of a grievance communication channel.

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### Overall Conclusion:

**Still need sustainable improvements**

Training for field supervisors and growers has been implemented but training on Code elements other than Child Labor and Health and Safety needs to be improved.
Worker training and access to communication materials in Burmese has not yet been addressed
Availability of grievance channel for migrant workers (Burmese) has not yet been addressed

Follow-up Company Action Plan:

Syngenta will ensure the following:

1. Prepare training module for all workers covering all the code elements in a comprehensive way. Syngenta understands the importance of all code elements but have addressed the issues of child labor and health and safety aspects more.

2. Posters & pamphlets covering all the code elements will be developed and used to sensitize the growers and workers on all nine code parameters. This communication material will be developed in both Thai and Burmese language.

3. A dedicated telephone number (which can be answered in Burmese) and suggestion boxes (will be kept at grower leaders’ houses, which is the contact point for all stakeholders) will be made available for the workers. Syngenta team will educate Burmese workers on how to address grievances through this method. This will help Burmese workers to address these grievances.

Deadline Date: June 2017
### Child Labor

#### 2013 IEM Findings

**CL.1 General Compliance**
Several children who reported their own ages (11 – 14 years old), were found engaged in harvest work. Many young children (1 – 8 years old) accompanied their parents during farm work. There were many workers onsite who appeared to be very young but these workers stated that they were 15 years old or older. None of the workers carried identification, therefore, monitors could not confirm their ages. Some of the children attended school, while others did not. There is no Thai law concerning the compulsory education of migrant workers’ children.

**Company Action Plan**

1. Syngenta has developed a child labor policy and procedure. The plan is to: (1) train growers, workers and staff members on the child labor policy, (2) monitor the implementation of the procedure at farm level, (3) develop supporting documentation, (4) review and analyze cases of repeated non-compliances. A remediation procedure will be put in place as related to these cases.
2. Syngenta will conduct an assessment among the migrant workers’ children to identify the factors preventing their access to education. Based on the assessment results, a consultation will be organized with the migrant workers to address the issues surrounding their children’s education;
3. Syngenta will coordinate with the local government to support migrant workers children’s education in the nearby schools.

**CL.3 Proof of Age documentation**
Growers do not verify the identification documents of the workers contracted to harvest corn on their farms. They primarily judge which workers to hire based on their physical appearance. The workers interviewed do not possess any legal identification documents.

**Company Action Plan**
Syngenta has developed a child labor policy and procedure. The plan is to: (1) train growers, workers and staff members on the child labor policy, (2) monitor the implementation of the procedure at farm level, (3) develop supporting documentation, (4) review and analyze cases of repeated non-compliances. An age verification procedure will be put in place at the farms.

Syngenta will identify other possible means of verifying age by interacting with growers to finalize a procedure with a list of possible documents for verifying age. This would be included in the age verification procedure.

Syngenta will assist the growers in maintaining proof of age documentation for all workers, including migrant workers, long term and casual workers.

**CL.9 Children on premises**
Monitors observed that there are few restrictions placed on workers’ children. However, most growers understand that child labor is illegal in Thailand and not permitted under Syngenta/FLA regulations. Approximately 6 children were found working onsite (11 – 14 years old) with their parents. They were assigned to work in light processes, such as planting and harvesting.

**Company Action Plan**
Syngenta has developed a child labor policy and procedure. The plan is to: (1) train growers, workers and staff members on the child labor policy, (2) monitor the implementation of the procedure at farm level, (3) develop supporting documentation, (4) review and analyze cases of repeated non-compliances. An age verification procedure will be put in place at the farms.

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Syngenta will assist the growers in maintaining proof of age documentation for all workers, including migrant workers, long term and casual workers.
supporting documentation, (4) review and analyze cases of repeated non-compliances.

The procedure will be implemented at farms; this will make sure that children on premises will not be involved in hazardous processes/task.

**CL.10 Removal and Rehabilitation of Child Labors**

Interviews with IMS management found that regarding child labor, there is no system or plan in place or clear policy about the removal of child labor or their rehabilitation. However, due to the farms remote locations, schools are not easily accessible for many migrant workers. In other cases, Burmese workers may voluntarily choose not to allow their children to attend migrant learning centers. Additionally, Thai schools do not accept children without proper identification cards.

**Company Action Plan**

Syngenta has developed a child labor policy and procedure. The plan is to: (1) train growers, workers and staff members on the child labor policy, (2) monitor the implementation of the procedure at farm level, (3) develop supporting documentation, (4) review and analyze cases of repeated non-compliances.

Syngenta will coordinate with the local government to support the education of the migrant workers’ children and for them to study at school, with support from the grower leader.

Syngenta plans to advise growers that Burmese migrant workers should leave their children with other family members in Myanmar. If this is not possible, they must carry the necessary documents for their children to access education at the Thai learning centers.

**Deadline Date: May 30, 2015**

**IEV Finding (2015)**

As per the action plan, Syngenta has developed a child labor policy and procedure. Syngenta educated growers on age verification in the pre-season meeting and pre-harvesting meeting. However, the verification team did not observe any documents to assist growers in providing proof of worker’s age. At farm level, growers have little awareness of the age verification process. They decide which workers to hire based on their physical appearance. None of the visited farms showed that they have an age verification process in place.

More than 70% of the migrant workers were familiar with the child labor policies in terms of hiring age. In terms of education for children, only a quarter of migrant workers reported that they send their kids to a migrant children’s school. Syngenta has reported that they are looking into ways to increase enrolment in migrant schools. They hope to identify which factors prevent migrant workers from gaining access to education. Syngenta is going to create a plan, with coordination with migrant childrens’ schools, to provide information to migrant workers and encourage them to send their children to school. However, the plan has not yet been implemented as laid out in their action plan. It should be noted that many of these so called “migrant childrens’ schools” are not officially recognized by the Thai government.

Regarding children residing on and around the farms, there was no mechanism found to secure child safety in the workplace. Although Syngenta educated growers on child safety, the verification team observed hazards in the workplace. For instance, pieces of machine blades and broken bottles were generally found on the farms.

**Overall Conclusion:**

**Still need sustainable improvements**

Child labour policy in place: being implemented
Age proof verification: not yet addressed
Children on premises: not yet addressed
Removal and rehabilitation of child labor: in process, but not yet fully implemented

New finding:

The verification team witnessed one child laborer who was 13 years old and 5-months pregnant. She worked on a farm in Tee KaPur Village. She lived with her husband and mother. It was further assessed that they move from one farm to the other for work and were considered temporary labor in the field visited. She worked on piece rate basis and her working hours were similar to that of the rest of the workers, however her house was close-by so, according to the growers, she could take rest whenever she wanted. There was no medical relief provided to her, especially when her needs are different from other workers.

Follow-up Company Action Plan:

Syngenta will explore the possibility of rehabilitation of the child laborers. This includes attempts to admit child laborers in to school and provide appropriate medical relief wherever needed. Syngenta has already identified one Burmese NGO to facilitate the process and talks are in progress.

In this particular case, the Syngenta team has advised the grower to discontinue this worker from work. The grower has been given clear instructions on how to prevent such situations in the future. In the action plan for addressing the issues of child labor, Syngenta will:

- Prepare the module and extend the training on the child labor and various code parameters.
- Sensitize the growers and workers through posters and pamphlets.
- Stringent monitoring of the farms through IMS checklist.
- Discontinue association with the grower, as a last resort, if child labor cases are repeated in the same farm.

In addition to the above, Syngenta will provide the documentation kits to all the growers to maintain all types of records. FLA manager and the field production manager will extend the training on how a documentation kit has to be maintained at the farm level. This documentation kit will contain:

- Name and age of the worker.
- Arrival and departure times for work.
- Wages paid.
- A photocopy of age proof document.

Syngenta will encourage the growers maintain photocopies of the Thai government authorized age verification document in the documentation kit.

Deadline Date:

For the farm workers training on COC with a special focus on child labour remediation and rehabilitation: 25% workers will be covered in 2016, the rest will be covered by 2018.
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<th>Harassment or Abuse</th>
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<td><strong>2015 IEM Findings</strong></td>
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<td><strong>H&amp;A.12 Grievance Procedure</strong></td>
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No complaints were directed at growers. FLA’s COC provision for harassment and abuse was posted but not in Burmese. Additionally, Syngenta does not have a system in place for the farms to record or handle potential grievances.  

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The interviewed workers have not reported on any harassment or abuse.  
As per the action plan, Syngenta provides grievance channels for both growers and workers to report non-compliance. This is in the form of the telephone number for Syngenta’s local office and the direct line to the FLA program manager. However, based on IMS interview, Syngenta does not have in place a channel of communication for Burmese workers who do not speak Thai. The channel provided is only available in Thai and English; most of the workers (95%) are Burmese.  

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<th>Overall Conclusion:</th>
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Still need sustainable improvements  
Grievance procedure: implemented but not accessible to most of the workers  

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<th>Follow-up Company Action Plan:</th>
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A dedicated telephone number, which can be answered in Burmese, and suggestion boxes which will be kept at grower leaders’ houses; these houses are used as the contact point for all stakeholders and will be made available to workers. Syngenta team will educate Burmese workers about how to address the grievances through this method. This will help Burmese workers to address grievances.  
In addition to that, Syngenta will set up a grievance redressal committee at the IMS center level. In the first phase, a committee in Lobpuri will be established by the end of 2016, this will be extended to all production sites by the end of 2017. The committee members will be made up by the Fair Labor Program Lead, Field Production Manager, Growers representatives, Worker’s representatives, the local Seed Organizer and local NGO/CSO representatives. The structures and procedures will be finalized soon.  

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# Non-Discrimination

## Previous IEM Findings

### D.2 Employment Decision

Some tasks and functions, for example carrying heavy loads, are traditionally assigned to male workers as they are assumed to be stronger than women. In these areas, cultural traditions govern decision-making, which can impact the type of work and related remuneration given to male or female workers.

## Company Action Plan

Syngenta will implement an effective non-discrimination procedure. Concerning cases of sex-based wage discrimination. Syngenta will verify the wage records and take action as per their procedures.

**Deadline Date:** December 2016

## IEV Finding (2015)

The non-discrimination policy was discussed at farm level during the pre-season meeting and pre-harvest meeting. Information on non-discrimination was presented and posted at the grower leader’s house and other important places, such as schools. In the case of gender based wage discrimination, cultural traditions govern this decision-making which can impact the type of work and related remuneration given to male or female workers. Less than half of the workers are aware of the harassment and abuse policy.

During the IMS interview, Syngenta reported they are in the process of developing a system to investigate wage discrimination. Notwithstanding, the verification team found no evidence of discrimination while interviewing workers during harvesting periods.

### Overall Conclusion:

**Still need sustainable improvements**

Non-discrimination policy is being implemented but Syngenta still needs to work more on gender based discrimination regarding work allocation.

## Follow-up Company Action Plan:

Syngenta will develop the policy on non-discrimination where work allocation will be based on merit and not on gender, religion or caste. The growers will be informed of this policy in order to disburse the information to their workers and encourage workers to pursue jobs they are interested in.

The Syngenta team will ensure that the contents of this policy be trained to all growers during the COC awareness training. For those who will not be able to attend, information will be generated through posters, pamphlets and other kinds of communication tools. The tools will be used in the local language. In addition to that, the workers will be informed about the existing grievance channels, wherein they can raise complaints against any discrimination based on gender. The complaint boxes will be placed at grower leader’s houses, IMS center and workers residence also in all production area.

**Deadline Date:** June 2017
# Health and Safety

## Previous IEM Findings

### H&S.1 General Compliance
There are no health and safety regulations in Thailand that govern agricultural work. However, Syngenta has started training growers on ways to protect workers from chemical hazards. However, growers did not have a good understanding of how to protect either themselves or their workers.

### Company Action Plan
1. Syngenta will develop a health and safety manual to be followed at farms;
2. Syngenta will train all growers through a power point presentation on the Company’s COC, first aid, and safe chemical usage;

Syngenta will provide FLA board to two grower leaders to display the nine Code elements, in addition to other posters that support Health & Safety at their farms. Syngenta will provide information, education and communication materials (IEC), for example HSE poster and pictures of PPE usage at the fields to be displayed on the notice board.

### H&S.3 Written Health and Safety Policy
There is no clear H&S policy that relates to the responsibilities of both Syngenta and growers on contracted farms. The one page policy provided by Syngenta staff was deemed inadequate.

### Company Action Plan
Syngenta will provide a health and safety policy in the Internal Monitoring System (IMS) manual that will be given to growers, the same will be communicated to the workers.

### H&S.4 Health and Safety Management System
Monitors did not observe any form of health, safety, and environmental (HSE) management system on any of the grower farms. The IMS Center has a one page HSE policy. However, this policy does not clearly identify procedures to be followed on contracted farms.

### Company Action Plan
1. Syngenta will provide a health and safety manual with policies and procedures to be followed at farms to growers, Syngenta will also educate them on using the manual;
2. Syngenta will educate the grower leader to fill out forms for reporting death, illness and other health incident/accident and safety issues at the growers’ farms and how to analyze/assess present conditions and continuously improve;

Syngenta and grower leaders will ensure that workers handling chemicals will have an annual health check.

### H&S.5 Communication to Workers
Workers were not aware of the risks involved with spraying chemicals or other potential hazards on the farms. Some safety posters were available but they are in Thai, which was unhelpful for workers who are only literate in Burmese.
Company Action Plan

1. Syngenta will identify Burmese migrant workers and train them;
2. Migrant workers will be invited to the regional area and trained on the nine Code elements, first aid, and safe chemical usage by power point presentation in their local language (Burmese);

These trainings will be conducted at the beginning of every season. The issues that need special attention will be identified by trainers and Syngenta representatives; these will be highlighted during the seasonal trainings.

H&S.6 Access to Safety Equipment and First Aid

Some personal protective equipment (PPE) was found on site, but in most cases they were inappropriate or of poor quality. There were no first aid kits found on site.

Company Action Plan

1. Syngenta will train growers and workers. This training will include aspects like the nine Code elements, first aid, and safe chemical usage. The safe chemical usage aspect will constitute the five golden rules, triple rinse, chemical storage and chemical application techniques;
2. Syngenta will provide the Material Safety Data Sheets (MSDS) and the safe chemical usage guidebook in Thai to growers and workers. They will focus on chemical awareness and the right use of PPE, including the right material and right method;
3. Syngenta will provide personal protective equipment (PPE) to 50% of the growers. The company will create awareness among growers and workers on PPE usage;
4. Syngenta will encourage one grower leader to support the growers in supplying PPE and first aid material to their workers.

H&S.7 Personal Protective Equipment

While there was no documentation available related to H&S onsite, Syngenta has begun to distribute some forms of personal protective equipment (PPE) to growers and provide related training. However, in most cases, the type of PPE used was not appropriate for the related job, particularly in the case of pesticide spraying. As most workers were not aware of the chemical risks, they did not use the appropriate PPE for chemical protection. Workers said PPE was uncomfortable to use while they were spraying. The PPE that growers and workers reported on using was mainly a piece of fabric wrapped around their face, some also mentioned using boots or gloves. It was apparent from both grower and worker interviews that they were not adequately concerned about risks or the necessity of PPE use. Additionally, goggles were not available. Gloves, boots, and some types of masks were available, but were reported not to be in regular use.

Company Action Plan

1. Syngenta will train all growers and selected workers. This training includes topics such as the nine Code elements, first aid, and safe chemical usage. The safe chemical usage aspect will constitute the five golden rules, triple rinse, chemical storage and chemical application techniques;
2. Syngenta will provide the MSDS and safe chemical usage guidebook to growers and focus on chemical awareness and the right use of PPE, including the right material and the right method, as per the WHO standards;

Normally, the workers have their own basic PPE for work at the farm. However, Syngenta will educate the grower leader to focus on the use of standard PPE and to create awareness on the potential risks, particularly in relation to the chemicals used.

H&S.8 Chemical Management and Training

There are no designated chemical storage areas. Some workers store chemicals inside their homes (for fear of
Some chemicals were stored with other work supplies. There was no separation of potentially flammable or dangerous chemicals. Growers had minimal knowledge of the dangers of physical exposure and minimal knowledge on how to handle accidents. Used chemical containers were disposed of around workers’ homes. Some growers and workers reported short-term illnesses and allergic reactions that appear to be related to pesticide, fungicide and herbicide exposure (to be further investigated). A few growers reported health problems related to chemical spraying. They suffered from ailments, which, they believed were due to chemical usage, such as dizzy spells, and have gone to the clinic for treatment.

Company Action Plan

1. Syngenta will train 50% of the growers and workers. This training includes aspects like the 9 Code element, first aid and safe chemical usage. The safe chemical usage aspects constitute 5 golden rules, triple rinse, chemical storage and chemical application techniques;
2. Syngenta will provide safe chemical usage guide books to all trainers and growers to maintain the quality of all trainings;
3. Syngenta will focus the training on safe chemical storage at the grower leader’s farms. Actions will focus on storing chemicals properly, preparing chemical storage and properly maintaining access to the chemical storage room.

H&S.12 Medical Facilities

No standardized first aid was available to workers. Additionally, growers did not provide first aid kits for worker use. Growers’ farms have no medical emergency plan in place.

Company Action Plan

1. Syngenta will train 150 growers and 15 workers. This training includes topics such as the nine Code elements, first aid, and safe chemical usage. The safe chemical usage topic will constitute the five golden rules, triple rinse, chemical storage and chemical application techniques:
2. Syngenta will arrange for the notice board at grower leader’s farms to display the EMS telephone number including EMS for Hospital – 1669;
Syngenta will provide first aid kits to 50% of the growers during this year.

Deadline Date: December 30, 2016

IEV Findings (2015)

As per the action plan, Syngenta provided health and safety training to all growers in the orientation meeting, pre-harvesting meeting and communicated about health and safety in the written contracts. Syngenta gave some PPE to the growers, such as masks, in exchange for empty chemical containers. However, based on observations and interviews, most of the growers and workers were responsible for their own protection. Growers and workers do not have a good understanding of how to protect themselves. Inappropriate protective equipment was found, such as medical gloves being worn for agricultural uses. Assessors also observed workers wearing rubber slippers during field activities. Based on observations, roughly 20% of the workers were wearing appropriate PPE.

Based on farm observations, no health and safety management system is present. There was no evidence to indicate that Syngenta educated seed organizers to create reports or conduct analysis on H&S issues.

The verification team observed health and safety posters posted in some places like the organizer’s house and schools, but the team did not observe any posters on the farms. Moreover, the posters were not available in Burmese, the language spoken by 95% of the workers, therefore it is difficult for workers to access information. Based on IMS interview, Syngenta has a plan to train workers on the COC, including health and safety. Burmese experts will be invited to assist and train the workers. However, the process is under development, and it is not
clear when the program will start.

Symptoms related to illnesses caused by chemicals, such as dizziness and vomiting, were reported by a few workers. No plan is implemented to ensure that chemical-related workers would get an annual medical health check. Half of the workers interviewed reported that they were responsible for their own health care. As such, most workers sought treatment after falling ill at the local health clinic. No first aid kits were found onsite, however, Syngenta has a plan to provide free first aid kits to growers and workers by the end of the year.

Assessors observed some improvement on chemical disposal in this region. Syngenta set up a program to solve chemical disposal issue (referred to during a 2013 audit). Syngenta collected empty chemical bottles from growers and growers would receive PPE such as masks and gloves in exchange. The verification team found a few empty chemical bottles on the premises of the farms.

Overall Conclusion:

**Still need sustainable improvements**

- H&S policy and procedures – not yet fully implemented
- PPE usage – training is being provided, but not effective at farm level
- H&S communication to workers – not yet addressed
- Chemical management and training – is being implemented
- Medical facilities and access to first aid kits – has yet to be fully addressed

**Follow-up Company Action Plan:**

Syngenta’s health and safety policy along with the Internal Monitoring System (IMS) manual will be distributed to all the growers, the same will be communicated to the workers.

The Syngenta Crop Protection team will be engaged to provide specific health and safety trainings. The safe chemical usage trainings will be organized for growers and workers at cluster level. This training will be focused on chemical storage, safe use of PPEs, safe disposal of empty containers, etc. The seed organizers will be requested to provide periodic HSE reports, incidents or accidents and safety issues at grower farms; this will help analyze and assess farm conditions.

Syngenta will provide some samples of PPE and encourage the growers to provide proper PPEs to the workers, this will be monitored by the field supervisors. Syngenta will request the seed organizers and growers to buy PPE for their workers. In addition, Syngenta will supply first aid kits on the pilot level, this will be placed at the seed organizer level and also maintained by the field supervisors. A few first aid kit boxes will be installed at workers’ living place where it can easily be accessed by workers.

Various communication tools, such as posters, pamphlets etc. will be used to inform the growers and workers. All these tools will be converted in to worker’s language. The mechanism of collection and disposing of empty containers will be continued and this will be extended to all other production locations phase wise, it is to cover all locations by 2020.

**Deadline Date:**

- Distribution of IMS manual to all the growers: 2016/2017
- ToT for field implementing team: Field Supervisors and Seed Organizers on HSE policies: By end of 2016
- Safe chemical usage training for workers and growers by Syngenta Crop Protection Team: 25% workers will be covered in 2016 and will cover all by 2020.
- First Aid and OHS Trainings: 25% workers will be covered in 2016 and all will be covered by 2020.
- Use of communication tools (posters, leaflets etc.): 50% of workers will be covered by 2016 and all will be covered by 2017 onwards.
- Supply of PPE kits to chemical spraying workers: 50% of workers will be covered by 2016 and will all be covered by 2018.
<table>
<thead>
<tr>
<th>**</th>
<th>Supply and install first aid kits: On pilot basis in one location by 2016 and cover all other locations by 2020. Empty container disposal mechanism: 20% of farms covered in 2016 and all other farms covered by 2020.</th>
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## Hours of Work

### Previous IEM Findings

### HOW.2 Rest Day
Workers are temporarily engaged by growers (four-month period during corn crop watering), workers water most days. To ascertain actual workweeks, there would need to be records of all work, including non-Syngenta based tasks carried out by farmers and workers on other farms.

### Company Action Plan
Syngenta will assist growers in providing attendance and wage records. Syngenta will train them in recording the work weeks of laborers.

### HOW.4 Overtime
While typical working days appear to be under eight hours, there are no records available for review. Many workers have multiple jobs and are engaged outside of Syngenta farms (other corn companies, along with rose and vegetable farms). Additionally, workers are engaged by growers who also care for garlic on the same Syngenta farms that produce corn. It is therefore possible that workers work excessive overtime during peak harvest periods.

### Company Action Plan
Syngenta will discuss with growers during pre-season meetings about overtime work and assist them in maintaining hours of work records and wage records to assess the situation in the next season.

**Deadline Date:** December 2016

### IEV Finding (2015)
Syngenta has started issuing what they call a “documentation kit” to educate growers during the pre-season meeting. The kit includes forms to record payment and hours of work. However, assessors found that many growers are not familiar with how to keep records. The verification team observed there were no formal records of wages, benefits or overtime compensation paid to workers. During harvesting season, payments are made on a daily basis based on the weight of baskets collected.

Based on observations, there is no system used to record actual working hours and holidays. Growers also have minimal awareness on how to create attendance/payroll records.

**Overall Conclusion:**

- **Still need sustainable improvements**
  - Hours of work policy: implemented
  - Record maintenance: not yet addressed

**Follow-up Company Action Plan:**
Syngenta will inform the growers during regular meetings, formal and informal, to maintain the ‘Grower Documentation Kit’ (GDK) to record the wage and working hours. In the first phase, 50% of the growers in three provinces will be distributed the GDK by 2016 and by 2018 all the farms will have the GDK. If the growers require further support to record their details, field supervisors will support them during their field visit. This will be monitored during internal monitoring visit.
**Deadline Date:** Distribution and education of growers to maintain the GDK records at farm level: 50% will be covered by 2016 and the rest will be covered by 2018.

## Wages, Benefits and Overtime Compensation

### Previous IEM Findings

#### WBOT.1 General Compliance
There are no applicable laws in Thailand for the agriculture sector. However, the rates paid to the workers are below the minimum wage in both the manufacturing industry and the farm sector in the central provinces of Thailand.

#### WBOT.2 Minimum Wage
The lowest wages paid are well under the Thai minimum wage if calculated on an hourly rate. In Thailand, wages are calculated on a daily rate as per the law and do not pertain to agriculture. Some workers earn a piece rate wage similar to the Thai minimum wage. There is a standard price for non-Thai labor. However, no written contracts were available for review.

### Company Action Plan

Thailand does not have any specific laws governing minimum wage in the agriculture sector. Hence, Syngenta plans to conduct a study with the support of an external agency to assess the present wage situation of workers in the agriculture sector. The study plans to assess if the current wages earned helps the workers to lead a decent life and maintain enough savings for the future. The results will be discussed with the production team and help Syngenta agree on a fixed wage that would be the benchmark wage for the workers hired in Syngenta contracted seed farms.

#### WBOT.7 Record Maintenance
There are no records available for review that are related to worker pay rolls at the grower farms or at the IMS Center.

### Company Action Plan

Syngenta will make efforts to educate and assist the growers in maintaining wage records; such records shall be acknowledged by the workers.

Syngenta will provide a suggestion box at the grower leaders’ house. Any issues regarding wages could be communicated to the FLA manager through the suggestion box. The suggestion box would be opened by the FLA Manager or the Production Manager, who would then take further action, if necessary.

**Deadline Date:** WBOT 1& 2 – December 30, 2016 and WBOT 7 – May 30, 2017

### 2015 IEV Finding

The IMS centre maintains updated documents related to the local labor laws such as minimum wage, equal remuneration etc. Interviews with management and field staff indicate that they are aware of the legal provisions related to wages and benefits. Based on IMS staff interviews, they have educated growers on the ways to implement the documentation kit as a means to track payment records and hours of work at the farm level. The documentation kit was provided to growers in the pre-season meeting. However, it was found during farm visits that many growers are not familiar with how to keep records and are not aware of the advantages of record
keeping. There were no wage, benefits, and overtime compensation records kept on the farms.

Although workers were aware of the Thai minimum wage, the wages paid to workers are between 120 and 150 Baht per day. This amount is lower than the Thai minimum wage of 300 Baht per day. However, the minimum wage law does not apply to farming or any related processes. It was possible for migrant workers to earn wages similar to the Thai minimum wage only in some activities such as harvesting, which are paid on a piece rate basis.

In terms of the action plan above, Syngenta is yet to present a comprehensive study of wages or minimum wages paid in the Thai agricultural sector or a related well-being study. This has not been conducted so far as planned.

Based on worker interviews, overtime is paid only in some activities such as detasseling, but the verification team did not observe this activity. Overtime is based on a verbal agreement between growers and workers. In some cases overtime is paid in-kind in the form of rice or side dishes during meal time. However, there are no formal overtime records or records of meals provided to workers found onsite.

Overall Conclusion:

Still need sustainable improvements
Record maintenance – kits were distributed but records are not kept by the growers
Wage study – not conducted

Follow-up Company Action Plan:

Syngenta will inform the growers during the meeting to maintain GDK to record wages and working hours. In the first phase, 50% of the growers in three provinces will be distributed the GDK by 2016, all other farms will receive the GDK by 2018. If the growers require further support to record details, field supervisors will support them during their field visit; the same will be monitored during internal monitoring visits.

Syngenta will conduct a comprehensive study on minimum wage in Thailand’s agricultural sector with a special focus on seed production. During the study, inputs will be collected from local authorities, the ministry of labor, and other local NGOs and CSOs. Based on this study, if we found deviation or gaps, corrective action plans will be designed to address the issue in the seed production sector.

Deadline Date:

Distribution and education of growers to maintain the GDK record at farm level: 50% will be covered by 2016, all other farms will receive the GDK by 2018.
Wage study analysis in seed production and design correction action plan: by end of 2016.