INDEPENDENT EXTERNAL MONITORING OF SYNGENTA’S CORN SEED SUPPLY CHAIN IN THAILAND

EXECUTIVE SUMMARY

For the assessment year 2015-2016, the FLA conducted unannounced independent external monitoring (IEM) and independent external verification (IEV) visits to assess working conditions in Syngenta’s corn supply chain in Thailand between the months of September 2015 and April 2016.

Three assessments were conducted, of which two were IEMs and one was IEV. The IEMs were conducted in the regions of Suphanburi and Lampang; while the IEV was conducted in Tak Province. The IEV assessed the progress of Syngenta’s remediation of non-compliances found at the farm level in previous monitoring visits done two years ago (2013) in the same villages.

The methodology adopted to conduct the assessments comprised our main components: (1) visit to Syngenta’s local office, (2) visits to supply chain intermediaries like seed organizers, (3) farm visits, and (4) external stakeholder consultations. FLA external assessors visited a total of 41 small family-run farms, and interviewed a total of 91 workers who were involved in pollination and detasseling activities (30 workers in Lampang, 40 in Pobpra, and 21 in Suphanburi).

This report summarizes the FLA’s findings for its 2015-16 assessments and the companies’ responses to those findings, and summarizes the progress and remaining gaps in remediation of issues found during previous assessments in 2013 and 2014. Comparison of the FLA’s verification findings in 2015 with findings from 2013 shows progress in some areas like building training programs, development of policies, and establishment of grievance mechanisms, but gaps remain to be addressed in generating awareness among workers and growers on some code elements and the grievance systems, making the information available to Burmese migrant workers, and implementing some policies like age verification and record-keeping at the field level.

To access the detailed reports of 2015-16, please visit http://www.fairlabor.org/affiliate/syngenta.

1 In Thailand, corn-growing farms are small family-run farms with few hired laborers. Growers from nearby villages help each other during peak activities. A few casual workers are hired for detasseling and harvesting activities. If the production region is bordering Myanmar, the labor force often involves Burmese migrant workers.
2015 Findings

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<thead>
<tr>
<th>SUMMARY OF FLA IEM FINDINGS</th>
<th>SUMMARY OF COMPANIES’ COMMITMENTS (Corrective Action Plans)</th>
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<tbody>
<tr>
<td>CODE AWARENESS AND GRIEVANCE SYSTEM</td>
<td>To address these findings, the Syngenta team reported it has devised a strategy to incorporate a peer education model, by engaging the growers to inform the additional part-time farm workers or non-Thai speaking workers about the code contents.</td>
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<td>Syngenta has been conducting code awareness trainings with all the growers in its supply chain. However, this training does not extend to all of the workers on the growers’ farms. For instance, in the region of Lampang, some local workers understand that Syngenta follows a Workplace Code of Conduct, but this information has not reached part-time workers who live outside the community. In the Pobpra region, non-Thai speaking workers have not had access to code awareness training. Similarly, in the Suphanburi region, workers were not familiar with the Code of Conduct details and had no access to Code of Conduct material. The Syngenta team has introduced local phone numbers (for the Syngenta office) to address the issue of establishing grievance mechanisms for workers and growers. However, it was observed that the majority of the workers were not aware of the existing systems or did not have access to the information about where the contact details are provided. In Pobpra, 95 percent of the workers are Burmese migrant workers, but the grievance channel is not available in their language. In addition, there are no non-retaliation policy and procedures in place.</td>
<td>In addition, Syngenta will publish pamphlets and posters to be displayed in common production areas for the worker’s awareness. They will be available in both Thai and Burmese languages wherever migrant workers are hired.</td>
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<td>CHILD LABOR</td>
<td>In order to improve grievance channels, Syngenta reported it will establish, along with the local Syngenta contact number, suggestion boxes for the use of workers and growers. The boxes shall be placed in each seed organizer’s house. The growers and workers can anonymously use this channel to share their concerns. Syngenta will develop a non-retaliation policy and include it in the communication and training plan. Syngenta production officers in each location will ensure that the growers and workers are aware about the systems. Communication tools (used for code awareness) shall also contain the details of the grievance handling systems.</td>
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Syngenta has prepared a child labor policy and the information has been disseminated to all growers. However, one common issue observed in all regions has been the absence of age verification systems while recruiting workers in the field.

In addition, Syngenta also lacks a child labor remediation process – detailing the steps growers and Syngenta should take -- for farms where children could be identified. For instance, in the region of Pobpra, a 13-year old pregnant migrant worker was observed to be working in the field. Moreover, this child worker had no access to medical care, or any special labor considerations related to her condition.

To address this issue, Syngenta reported it has devised a ‘Grower Document Kit’ (GDK) to enable the growers to maintain all types of records. The Syngenta local team will train the growers about record maintenance and require them to maintain the details of each worker, along with their age (with photocopy of age document), working hours, and wages paid. In the absence of any age verification document, a dental certificate by local doctor shall be admitted. Syngenta aims to accomplish this task by covering 25 percent growers in each of four phases, covering 100 percent of growers in all production areas by 2019.

To address the issue of child labor in Pobpra, Syngenta has identified a local NGO to facilitate the process of rehabilitating the girl into a non-hazardous occupation along with providing her medical aid. The grower, in this case, has been provided instructions about preventing such cases in the future.

**NON-DISCRIMINATION**

In the Suphanburi region, assessors observed some discriminatory behaviors among workers, especially toward transgender workers that were present in the fields. Due to their unawareness of the grievance channel, those workers had no way to raise the issue and solicit support for addressing it.

In Pobpra, the 2013 assessment identified that work allocation between male and female workers resulted in disparate wages paid to men and women. Some better-paid tasks (considered to be heavy work) are traditionally assigned to men. In 2015, assessors observed that Syngenta had developed and communicated a non-discrimination policy to the growers but that the issue of discrimination in work allocation requires further investigation and solutions.

To address the issue identified in Suphanburi, Syngenta reported it will strengthen its communication and training program on the Code standards and grievance mechanism, as described above. The specific discrimination issue among workers will be emphasized in these trainings. To address discrimination in work allocation, Syngenta’s policy will require that jobs are assigned based on skills and ability and not gender. Awareness raising for workers will also be implemented.
### HEALTH AND SAFETY

Syngenta has been disseminating training on general health and safety information and materials to the growers and workers; however, gaps were observed which were common to all areas where assessment was done.

- The health and safety policy was not maintained at the seed organizers’ or production sites.
- Training content has not reached all workers.
- Personal Protective Equipment (PPE) and first aid kits are not available for all workers. In areas where PPE was provided, the workers were not seen using them.
- Risk assessments of the chemicals in use at the farms had not been conducted, and there was no indication of any health check-ups being provided for workers handling chemicals.

As a response, Syngenta intends to provide the following support to the growers and workers:

- Syngenta shall strengthen distribution of its health and safety policy and procedures. The details of these policies shall be imparted to workers along with code awareness program.
- Phased training shall be imparted with a training program being completed by the end of 2017. The training will also emphasize appropriate PPE usage, MSDS (material safety data sheets), and chemical management.
- To address issues concerning waste management, chemical management and PPE usage, Syngenta is planning to develop a pilot project with the name “return gift of health” to be implemented in Suphanburi, Tak, and Lampang provinces. Under this pilot, growers would, in exchange for hazardous waste like used chemical containers, receive PPEs from the Syngenta team.

### HOURS OF WORK AND COMPENSATION

In the Pobpra and Subhanburi regions, assessors observed that in spite of Syngenta’s effort to introduce a documentation kit for growers to maintain hours of work and wage records, the growers were not aware of how to maintain documents.

Syngenta has developed a ‘grower documentation kit’ which consists of record templates pertaining to attendance, wages paid, hours worked, and compensation provided. Syngenta committed to strengthen this system by training growers on how to maintain records and why doing so is important. Syngenta has a plan to progressively cover all growers in the entire production area.
Progress and Remaining Gaps in Syngenta Thailand Seed Supply Chain

To provide an overview of the overall progress implementation, the table below summarizes Syngenta’s efforts in program implementation in its supply chain following corrective action plans in 2013 and 2014 and shows recurring issues and remaining improvement areas identified in 2015.

<table>
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<th>Code Elements</th>
<th>Overall progress identified by FLA comparing the 2013-2015 assessment results</th>
<th>Areas where sustainable improvement is still required</th>
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| Code Awareness and Grievance Mechanism | ▪ Trainings imparted to both growers and local workers on the Code of Conduct, first aid, and chemical handling.  
▪ Establishment of a grievance mechanism.  
▪ Increased communication materials available to workers in Thai. | ▪ Lack of training and communication materials for the non-Thai speaking workers (Burmese and Karen).  
▪ Lack of access to grievance line for non-Thai speaking workers.  
▪ Low level of awareness of the grievance mechanism. |
| Child Labor | ▪ Child labor policy was developed and information has been disseminated to all growers.  
▪ Syngenta established relations with some local schools in order to implement rehabilitation of the identified children in farms.  
▪ New systems to maintain age-proof documents with the growers were developed (Grower Document Kit – GDK). | ▪ GDKs are not used by the growers and therefore, no age verification process is implemented.  
▪ Child labor monitoring and remediation process is not fully functional  
▪ More local CSO engagement is needed to identify potential support and partnership to address migrant child labor issues |
| Non-Discrimination | ▪ Development and communication of a non-discrimination policy to growers | ▪ Awareness of non-discrimination principles among workers  
▪ Further investigation to find solutions for work allocation issues between genders |
| Health & Safety | ▪ Trainings on H&S, emphasizing chemical handling and safety, PPEs, and pesticide usage were developed.  
▪ Syngenta provided assistance to growers and seed organizers to connect them with the appropriate PPE | ▪ Training contents on H&S should be reinforced, with a focus on chemical management and safety.  
▪ Sensitization of farm workers on safety needs to be strengthened.  
▪ Availability of PPE and first aid kits is not sufficient |
Efforts to sensitize workers and growers on hazards were made by posting materials in growers’ homes and on village walls.

**Hours of Work and Compensation**

- Growers were provided with GDKs for them to be able to keep track of the workers’ wages, hours worked, and workers’ ages.
- GDKs are not used by growers in the field and no hours of work and wage records are kept.

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