



[2019/2020]

FAIR LABOR ASSOCIATION
INDEPENDENT EXTERNAL VERIFICATION
AGRICULTURAL REPORT

Company: Syngenta

Country: Thailand

Crop: Corn

Production Process: Harvesting

Assessment Location: Tak province Thailand

Monitor: Ms. Chonticha Tangworamongkon

Assessment Dates IEM: December, 2017 – February 2018

Assessment Dates (IEV): February 14-18, 2020

Number of assessed farms (IEV): 10

Number of farmers interviewed (IEV): 10

Number of workers interviewed (IEV): 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](#).

Executive Summary

Background

The Fair Labor Association's (FLA) Principles of Fair Labor and Responsible Sourcing for the Agriculture Sector¹ require that the farms in the supply chains of each Participating Company are subject to FLA's annual Independent External Assessments (IEA).² Syngenta Seeds has been affiliated with the FLA since 2008 and executes its Fair Labor Program (FLP) in its hybrid seeds supply chain globally³.

Syngenta's Fair Labor Program (FLP) assesses labor practices on farms against the Syngenta Code of Conduct⁴. As an affiliated company, Syngenta has committed to meet the FLA Workplace Code of Conduct for the agriculture sector⁵ in its seeds supply chain globally and develop remediation plans for identified non-compliances. Each year, the FLA conducts about 20 field-level assessments covering a larger number of farms in various countries for Syngenta⁶. For the 2019 IEA cycle, the FLA conducted one Independent External Verification (IEV) to assess the implementation of the remediation plan developed by Syngenta in response to the 2017 and 2018 Independent External Monitoring (IEM) visits that were conducted by the FLA in the Tak province, in Thailand.



A team of FLA accredited assessors⁷ visited 10 Syngenta farms in the Tak province, producing corn, and interviewed 24 workers and 10 farmers who were involved in the harvest. The assessment team visited 8 farms in Chong Kaeb and Mahawan Subdistricts (in the Mae Sot District). The villages inspected in 2017 are located in either of the subdistricts. Of the 8 farms, 2 farmers started working with Syngenta for the first time. In addition to the 8 farms, assessors visited 2 farms assessed in 2017. With the exception of 2 new farmers, all farmers have participated in three trainings provided at different times (pre-farming, pre-detasseling, and pre-harvesting).

A total of 24 workers were interviewed in multiple languages (Thai, English, and in some cases Burmese). There were male and female workers as well as young workers. The age range was 15 to 55 years. Majority of the interviewed female workers were in their twenties. Some of the workers' children were present at the farms. Syngenta does not directly recruit farm workers, and relies on the recruitment efforts by the growers and/or grower leaders who manage production.

In addition to the workers' interviews, assessors evaluated Syngenta's internal management systems (IMS)⁸, conducted documentation review, growers' and their family members' interviews, visual inspection, and

¹ The FLA's Principles of Fair Labor and Responsible Sourcing are closely aligned with the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the OECD-FAO Guideline for Multinational with Agricultural Supply Chains. FLA Principles are available [here](#).

² The FLA conducts five types of assessments depending on the maturity of a company's social compliance program in a given country and commodity. These include, 1) Baseline Mapping, 2) Independent External Monitoring (IEM), 3) Independent External Verification (IEV), 4) Focused Assessment, and 5) Social Impact Assessment (SIA).

³ By 2019, Syngenta's Fair Labor Program covered 99.3 percent of all its seed supply farms globally, representing 29 of 33 seed-producing countries where Syngenta procured seeds from. Find more information here [Syngenta – Fair Labor Program](#)

⁴ <https://syngenta.pid1-e1.investis.com/sites/syngenta/files/code-of-conduct/download-our-code-of-conduct/syn-cofc-english-2019-v1-lr.pdf>

⁵ https://www.fairlabor.org/sites/default/files/fla_agriculture_code_of_conduct_and_benchmarks_october_2015.pdf

More FLA reports can be found here <https://www.fairlabor.org/affiliate/syngenta>

⁷ <https://www.fairlabor.org/transparency/fla-accredited-monitoring-organizations>

⁸ The objective of the IMS evaluation is to understand company profile, labor standard and compliance management system, internal monitoring, training program, grievance mechanism, remediation strategy, procurement practices and engagement with external stakeholders. The FLA assessors and staff collected data before, during, and after the field visits from; (i) company management interviews

consulted with local civil society organizations and the Labor Inspectors. This report provides the findings from the various FLA assessment (IEMs and IEV) between 2017 – 2020.

Summary of 2017-2018 IEMs

During **2017-2018**, the FLA conducted three IEMs in the Poph Phra district of the Tak province. The first IEM covered 8 farms during December 8-10, 2017 covering 63.4 acres. The second IEM covered 16 farms covering 116 acres in the Phop Phra district from January 14-17, 2018, during the detasselling. The third IEM took place in 12 farms from January 29 to February 1, 2018 during the harvest season covering 24 acres. Combined together over 100 workers were interviewed during the assessments.

Main findings during the 2017 – 2018 IEMs

Employment Relationship: There is no age verification system at the farm level. Farmers do not maintain proof of age documents for hired workers. There are no disciplinary procedures or practices established at the farm level. Workers who have been employed for more than 5 months and sometimes several year are not treated as permanent workers. The growers continue to treat the migrant workers who have been employed at the farm for a longer time as seasonal workers and their employment conditions are not as per the Labor Protection Act – in particular entitlements such as the social security benefits. None of the interviewed farmers was aware of legally mandated protection for special categories of workers such as the young workers.

Non-discrimination: Assessors found that Karen-speaking farmers preferred Karen-ethnic workers as compared to Burmese workers as they speak the same language. Farmers believe that Burmese workers are not as hard-working. Additionally, farmers mostly recruited men for higher paid tasks.

Forced Labor: A provision in the local labor law prohibits confiscation of worker's documents. Assessors noted that the interviewed farmers were aware of this provision. Their understanding of forced labor was limited to physical and mental coercion, particularly in the forms of threats and intimidations. Assessors noted that documentation retention – e.g. work permit documents and worker ID – was commonly practiced by farmers, limiting workers' mobility and freedom of movement. Workers are at risk as they need to retain these documents to prevent prosecution and/or extortion by the local police.

Child Labor: There is no documented procedure on child labor removal and rehabilitation. There is no awareness about the law concerning child labor in the agricultural sector. In one farm, a worker mentioned that a child aged 14 years has been working, although she was not seen by the assessors during the farm visit.

Freedom of Association and Collective Bargaining: In one farm, it was reported that the workers were trying to negotiate a wage increase. This created tension with the farmer and one worker eventually had to leave the farm. Workers who continued working on the same farm subsequently felt uncomfortable to bargain with the farmer. Their regular wage payments were delayed by three months. Despite asking for their wages, the workers only receive partial payment, and workers fear retaliation if they have to bargain or ask for their earned income.

Health, Safety and Environment: HSE awareness for workers is limited to PPE use. It is done through posters that are available in Thai and Burmese. No other HSE aspects are communicated to the workers. There is no chemical management system in the farms. Workers are verbally instructed on how to safely handle chemicals and have not received proper training. There is absence of any training or guidelines. Farmers have not made any provisions for the safety of vulnerable workers like young workers and pregnant women.

Grievance Procedures: Syngenta has established grievance boxes and hotline numbers to allow the seed organizers, farmers, and workers to confidentially report their concerns. There is a written grievance procedure available in Thai. Assessors noted that the seed organizers and workers are not aware of the existing grievance mechanisms and effective communication to the farmers and workers is lacking, Therefore, nobody uses them. Farmers are expected to inform the workers, and workers are expected to know the contents of the poster. Despite the presence of posters, none of the workers interviewed had any knowledge of the purpose of the number. The hotline operator only speaks Thai, while some workers speak Burmese or Karenese.

Hours of Work: Assessors interviewed workers who worked more than 12 hours per day (sometimes 14-17 hours) with cumulative weekly working hours up to 81 hours. Review of workers timecards found that some workers also worked 13 consecutive days without a 24 consecutive hours break in seven days.

Compensation: There is no legal minimum wage enforced for the seasonal agricultural sector in Thailand. However, the law stipulates paid sick leave, holiday and overtime pay for workers. None of the farmers provide these benefits. There was no payment system wherein workers would be paid on a regular basis. One worker expressed the need to have monthly wage but the farmer would pay once every 10 months and only pay petty advances for daily expenses and deduct it from the one-time payment. The current system is not one of informed consent. The absence of records raise the risk of further exploitation.

Based on the above findings, Syngenta provide a Corrective Action Plan (CAP) that was published by the FLA. The CAP usually take steps at a cluster level so that all farms are covered.

Summary of 2019-2020 IEV and Company's CAP

To verify the implementation of Syngenta's Corrective Action Plan (CAP), the FLA scheduled an IEV during the 2019-2020 IEA cycle. The CAP covers the actions taken at the internal management systems (IMS) level and at the farm level. See visit details above.

The assessors use the 242 benchmarks in the FLA Workplace CoC to assess the company's labor standard compliance status, including 56 benchmarks (30 percent) that are progress benchmarks. Syngenta's CAPs from 2017-2018 are based on these benchmarks. These benchmarks are grouped according to the FLA's code elements namely employment relationship, non-discrimination, harassment or abuse, forced labor, child labor, freedom of association, health, safety and environment, hours of work, and compensation.

Employment Relationship: During the IEV, assessors noted that the cases of undocumented workers and child labor increased. Growers and grower leaders were engaged in appointing undocumented migrant workers. The low level of awareness about age verification system continues to exist.

CAP:

- Syngenta will work with the growers to facilitate work permits for workers who do not have a valid permit as per the Thai law for migrant workers.
- Given the systemic nature and complexity of the situation, Syngenta will work in a collaborative way with stakeholders including CSOs.
- Syngenta field production team will continue the effort of conducting more trainings and awareness session to reach all the growers and workers.
- Syngenta will review the existing employment policies and conduct gap analysis. Based on the review, Syngenta will consult with growers to develop a process to protect workers' rights. Syngenta will develop an information kit for seed supply companies and growers which will contain FLP requirements.
- Syngenta will create awareness about worker age verification among growers during the pre-season meeting.
- Syngenta will monitor the responsibility of all seed supply companies to train all the growers on "maintenance of age proof documents."

Child Labor: Assessors found child labor in some farms. Migrant workers' children were also found in the farms during the peak activity. Assessors found no improvement in addressing the issue of child labor.

CAP:

- Syngenta field production will focus more on child labor incidences and effort will be taken to eradicate child labor completely from their seed production activity.
- Farm monitoring shall be strictly implemented and before start of the season or crop activities, the field production team will conduct the mapping of young workers and children especially among migrant workers.
- Syngenta will continue the Worker's Children Initiative with the support from the local schools. The team will support in identifying the children who are out of school. Effort will be taken to admit the children into temporary schools run by the local authorities and sponsoring the children education under the CSR program.

Freedom of Association and Collective Bargaining: Syngenta provides usual production trainings for farmers for every crop cycle. No action has been taken to raise awareness of farmers about labor rights and to facilitate dialogue between farmers and workers, including on the negotiation on wages and working conditions. Workers have no awareness about organizing and negotiating collectively.

CAP:

- Syngenta field production team will continue their efforts to conduct more trainings and awareness sessions for growers and workers. Every grower is contacted three times in a crop cycle during pre-planting, de-tasseling and harvesting and shall be explained the FLP commitment, field safety, and safe chemical management.
- At least once in a crop cycle a formal trainings or awareness session and other informal sessions during farm visits shall be organized for temporary and permanent workers to explain the FLP commitment, field safety, and safe chemical management. The topic of grievance mechanism will be added to the training.
- Syngenta field production team has field supervisors who knows Burmese. They will be selected as master trainers to deliver the trainings to growers and workers who speak Burmese.
- Syngenta has developed various communication tools such as posters, t-shirts (printed with FLP Codes), etc. In addition to this, field production team has power point presentations with animated video clips and pictographs. The team has planned to design flip charts, booklets / hand manuals with more visual messages.

Health, Safety and Environment: Though assessors found some improvements related to the training and awareness of HS, in some farms farmers and workers did not use appropriate PPE. Statutory guidelines related to disposal of chemical waste and storage are not followed in the regions. MSDS (Material Safety Data Sheet) is still not available for the chemicals being used in the fields.

CAP:

- Syngenta field production team will conduct field safety and safe chemical management training or awareness sessions to the growers in every season. Farm level awareness sessions shall be organized for migrant workers. The team has planned to design flip charts, booklets / hand manuals with more pictorial messages. These tools shall be translated so that workers can read it.
- Syngenta will encourage farmers to establish an agri-waste collection points in the farms or near the farmhouse to ensure proper disposal of waste. The field production team will monitor the farms regularly.

Hours of Work: Assessors observed there was the lack of awareness on hours of work and overtime continues to exist and farmers have not changed their behavior.

CAP:

- Syngenta will revise its Growers Distribution Kit (GDK) or farm workers record template to record the

workers details including attendance, working hours and wage payment.

- It is the responsibility of the growers to maintain it properly with complete details of the workers.

Compensation: Assessors found that wage advances were not recorded and GDK was not distributed. Wages were withheld for some workers in a farm. Workers were not paid the legal overtime and wage records are not maintained.

CAP:

- Syngenta field production team and FLP Lead will revise the GDK template with more user-friendly version. The responsibility of maintaining and recording the attendance, working hours and wage payments shall be given to growers to monitor regularly.
- Field production team will help and support the growers in this regard. This template will be distributed to all the farmers before start of the activity in the farm during pre-season meetings . It will ensure that the workers know their wage payments, attendance details and agree with all the details mentioned on the document.

FLA Conclusion:

Syngenta’s implementation of the FLP program in Thailand is slow. Even after three years of implementation of the FLP program, child labor and indicators of forced labor continue to exist. While Syngenta has taken some measures to improve the HSE, their efforts to reduce excessive hours of work do not entail a root cause analysis. The focus is on improving data collection tools. The trainings imparted to the growers and workers still lack the component of ensuring smooth farmer-worker dialogue and a non-retaliation process where workers do not fear retaliation to voice their opinion. While Syngenta cannot be in a position to help craft collective bargaining agreements, yet they can install mechanisms for growers and workers to have a smooth communication channel and dialogue. The IMS evaluation points out to several gaps in the FLP program implementation including lack of training for the local Syngenta staff on decent work principles, conducting a root cause analysis of the identified non-compliances, and taking a collective approach to build CAPs with active inputs from the growers and workers.

Employment Relationship

2017 Assessment Findings

Recruitment and Hiring (2017)

<p>Benchmarks: <i>ER.3.1: Employers shall verify proof of age documentation for all young workers in the farm at the time of their employment and work towards collecting and maintaining all documentation necessary to confirm and verify date of birth of all workers, including long term and casual workers.</i> <i>ER.3.1.1: Employers shall take reasonable measures to ensure such documentation is complete and accurate.</i> <i>ER.3.1.2: In those cases where proof of age documentation is not readily available or unreliable, employers shall take all necessary precautions which can reasonably be expected of them to ensure that all workers are at least the minimum legal working age, including requesting and maintaining medical or religious records of workers, or through other means considered reliable in the local context.</i> <i>ER.7.2: the production requirements or peculiarities of the labor market do not allow employers to hire permanent workers;</i> <i>ER.7.6: contract, temporary, casual, daily, seasonal or migrant workers receive at least the minimum wage or the prevailing industry wage whichever is higher, and all legally mandated benefits such as social security, other forms of insurance, annual leave and holiday pay;</i></p>	<p>Noncompliance in all farms</p>
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<p>Findings/Noncompliance Explanation:</p>	<ol style="list-style-type: none"> 1) Workers are not asked to present their documents to prove that they are not younger than 18 in any of the farms visited. Farmers determine workers' age by their look and what the workers or their families say. 2) Regarding hiring temporary workers, the corn production requires a 5-month-long continuous process for a crop cycle. In a year, if a farmer is contracted with the company for two crops, it will be 10 months of work for a "seasonal" worker. Plus,
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	<p>some "seasonal" workers are shifted to work on different crops with the same farmer from time to time. Some of them are shifted to work for family members of the farmer without extra pay. Some of them have worked with the same farmers for several years. Practically, they should be considered long-term or even permanent workers rather than seasonal workers. However, they are not treated as permanent workers whose terms and conditions of employment must be regulated by the Labor Protection Act. This prescribes several entitlements to a permanent worker, particularly social security. Further scrutiny must be conducted on some farms whether the long-term workers work for 10 months or all year round.</p> <p><u>Source:</u> Interviews workers and farmers</p>
<p>Company Action Plan:</p>	<p>Syngenta is committed to developing actions as follows:</p> <ol style="list-style-type: none"> 1. Syngenta will start collecting the data of international migrant workers who live longer period with the farmer. The data will be analyzed for developing multiple programs related to remediation, including profiling workers and their proof of age documentation process. In the dry season (starting September), Syngenta local staff shall choose a group of workers and farmers to create a profile of each worker and their family members. 2. Syngenta staff will select a group of farmers and workers in two different villages to improve the situation of a worker who does not have any valid ID. The training on the topic of Thai Labor Law and regulations will be arranged by Syngenta staff in collaboration with external organization LLC (Labor Law Clinic). 3. Syngenta will collaborate and facilitate with LLC to allow workers who don't have any identity cards at all to produce a valid ID. This shall be prioritized for the long-term workers associated with farmers. 4. The internal monitoring process will focus on the status of the situation.
<p>Deadline Date:</p>	<ol style="list-style-type: none"> a) Collection of information of the international migrant workers - April - September 2019 b) Collaboration and facilitation of establishing legal profiling and documentation with LLC - April till September 2019) c) Conduct training with farmers on the importance of worker profiling and age-proofing - September 2018 – February 2020 d) Data management at IMS – Ongoing

2019 IEV Findings

According to Syngenta local staff, none of the above mentioned actions have been implemented as planned. The action plan had been suspended from the beginning of 2019 due to restructuring of the organization until a new person has been appointed in September.

Regarding the two pilot areas, Syngenta has pre-selected two areas and plans to profile the long-term/ regular workers in the next crop season (starting in April 2020), and to provide support for the farmers to register these workers legally or semi-legally. Syngenta plans to base the profiling on the village head's records (explanation in the below paragraph). The purpose of this profiling is to have a data of farmers with registered workers for Syngenta to choose from when screening farmers to work with the company. The final choice of pilot villages will depend on the amount of production quota they have for the season.

Note that in Tak Province, at a district level, there is a semi-legal/ informal system to register migrant workers that is recognized at village, subdistrict and district levels. Registered migrant workers are not allowed to travel outside the district they are based in. Migrant workers or their employers can make registration with the village head and

renew it at the frequency announced by the village head. Farmers and workers provided information about the registration variedly in terms of expense and frequency. Some said every month. Some said every six months. Normally, every time it costs around 250 baht per person. However, this registration is only for village head to have record of migrant workers' existence in their village and informally allow them to be there. The card, casually called, "village head card" does not prevent the workers from getting arrested by the police or entitle them to any rights i.e. healthcare. Workers and farmers know the limitation of the card, so registered workers try to stay around in their village rather than travelling far. To a lesser extent, some workers, especially those who are older than 55 years old which is a maximum age to be allowed to be a migrant worker in Thailand legally, tend to pay the local police 250 baht every month to stay and work there. Although the village head card can be said to be illegal at worst or "semi-legal" or informal at best, the workers and their employer seem to prefer this card than a legal registration which costs them several thousands of baht each time.

The assessment team went to 8 farms in Chong Kaeb and Mahawan Subdistrict (in Mae Sot District), interviewed 11 farmers and 24 workers. Note that the villages inspected in 2017 are located in either of the subdistricts. Of the 8 farms, there were 4 farms who worked with Syngenta for the first year. Two of them produced the first crop. None of the farms that were harvesting at the period we went to do the verification were audited before. In addition to the 8 farms, we went to visit two farms audited in 2017 although they were not harvesting at the time. If including these two farms, altogether the assessment team visited 10 farms.

With exception of two farmers, all other farmers have participated to the three production trainings (pre-farming, pre-detasseling, and pre-harvesting). All of the farmers said that they were aware of not to hire child labor. They verified young workers' age by their look and asking their parents. The assessment team found 6 child labor in 4 farms, aged around 13-14. The assessors found a number of young children on most of the farms albeit not working. Most employers said it is impossible for the workers to leave their children alone at home. Several farmers mentioned incidents of rape and accidents when workers' children were left at home by themselves. Some workers said they did not know about child labor ban. All of them were daily workers. Some workers were aware of the ban and admitted to us that they asked their children to lie about their age when asked although in one farm a worker said their employer also knew. There is one farm where workers' shacks are next to their work farm so it was possible to leave their children there. In another farm, interview with workers showed that their employer rejected to hire children younger than 15.

Only farmers in 3 farms said they heard from Syngenta about hiring registered workers. Most of the farms with long-term/ regular workers have registered them with village head cards. There is one farm where the farmer registered most of their workers legally. It costed her 3,800 baht/ person/ year. There are two farmers (Father and Son) who have a family of migrant workers live and work at their farms as regular workers but they prefer leaving the workers undocumented as they have a way to "settle" if the police comes to inspect. All of the farmers said that registering workers legally is too costly to invest; if the workers will not stay and work with them long enough, so registering them legally will not be a waste of money.

Overall Conclusion	Still need sustainable improvement Nothing substantial has been done since the findings in 2017. Assessors found more undocumented workers and child labor than what was found in Year 2017. The profiling plan was said to start in April this year.
New findings:	In Year 2017, a lot of workers were properly documented. This year, most of the long-termed/ regular workers held "village head" cards, which is not legal, yet informally recognized at district level.
Follow-up Action Plan (to be filled by the company):	Most of the actions were undertaken as per regular schedule decided by the implementing team. As we know that, getting legal permits is a nationwide problem and also a complex issue which involves many complex documents and also attracts remarkable cost. Syngenta supporting the growers who have the legal permits to work with the company. For those workers who don't have the valid permits, company is encouraging to obtain the legal permits as per the Thai law of migrant

	workers. It will take little longer time to improve the situation.
Deadline Date (to be filled by the company)	<p>Progressive implementation timeline:</p> <p>2022: 25%</p> <p>2023: 50%</p> <p>2024: 75%</p> <p>2025: 100%</p>
Terms and Conditions (2017)	
<p>Benchmarks:</p> <p><i>ER.9.2: Employment terms shall be those to which the worker has voluntarily agreed, provided those terms do not fall below:</i></p> <p><i>ER.9.2.3: the FLA Workplace Code.</i></p> <p><i>ER.11: Employers shall ensure that all legally mandated requirements for the protection or management of special categories of workers, including migrant, juvenile, contract/contingent/temporary, casual, daily, home workers, pregnant or disabled workers, are implemented.</i></p> <p><i>ER.12.1: Employers shall regularly inform workers about workplace rules, health and safety information, and laws regarding workers' rights with respect to freedom of association, compensation, working hours, and any other legally required information, and the FLA Code through appropriate means, including posted in local language(s) throughout the workplace's common areas or in the surrounding community. In the case of workplaces with informal labor structures, these communication and awareness raising activities could be done with support from supply chain intermediaries such as cooperatives, organizers, tier one suppliers or the participating company.</i></p>	Noncompliance in all farms
<p><i>ER.9.2: Employment terms shall be those to which the worker has voluntarily agreed, provided those terms do not fall below:</i></p> <p><i>ER.9.2.1: provisions of national laws;</i></p> <p><i>ER.9.2.2: Freely negotiated and valid collective bargaining agreements; or</i></p> <p><i>ER.9.3: There can be no employment terms (including in written or verbal contracts or any other instruments or in any formal or informal recruitment arrangements) which allow employers:</i></p> <p><i>ER.9.3.1: to hold wages already earned; or</i></p> <p><i>ER.13.1: Farmer, sharecropper or any kind of supervisor who is leading workers shall have knowledge of the local labor laws and the FLA Code.</i></p>	Risk of Noncompliance in all farms
Findings/Noncompliance Explanation:	<p>The terms and conditions of work are communicated orally with assumed consent of workers who do not know what rights are guaranteed under Thai law. Farmers know little about legal prohibitions and labor standards. Their understanding is limited to child labor and PPE. Farmers are supposed to ensure communication and an understanding of workers' rights. That does not necessarily happen. In some farms, there is a "head worker" who is supposed to be a focal point between farmers and workers. The head workers are aware of the prohibition of child labor and the use of PPE but daily workers showed no awareness about FLA or Syngenta code. No farmers seemed to be aware of legally mandated protection of special categories of workers such as the young workers. They only know that they must document migrant workers, otherwise they could face hefty fines.</p> <p><u>Source:</u> Interviews with workers, farmers, seed organizer</p>
Company Action Plan:	<p>Syngenta has created "Happy Better Life with Syngenta" program to promote the FLA code of conduct. It simplifies the codes into two categories - 4 Don'ts (like no child labor, no forced labor etc.) and 5 Dos (like engaging in the employment relationship, unionization, safe workplaces etc.) in a graphical manner for the purposes of gathering attention from farmers and workers. In the beginning, the topics related to child labor and HSE were given the most importance, since it was easy for workers and farmers to understand.</p> <p>As per the findings above, Syngenta will improve the farmer awareness on other codes by:</p> <ol style="list-style-type: none"> 1. Create collaboration training with an external resource such as local legal

	<p>organization both NGO such as LLC and authorities, health care centers, and local schools.</p> <p>The training topics will be: Thai labor law for informal workers, rights and protections of workers, and the health protection and education of children. The training program will be arranged during the wet season planting.</p> <p>2. Syngenta will emphasize other codes during the regular farmer meeting. For the worker, Syngenta will initiate on-the-spot training with the permanent workers to improve their code awareness. To make it more visible progress, Syngenta local team will select the group of farmers and seasonal/long-term workers to attend these special training programs.</p> <p>3. The internal monitoring process will more focus on the code’s awareness.</p>
<p>Deadline Date:</p>	<p>Pilot training program from external experts for a selected group of farmers and workers by wet season 2018. On-the-spot worker training will start in dry season 2020</p> <p>IMS process focus on farmer code awareness for the pilot group in 2020-21 and it will extend to cover 100% farmers by 2022.</p>

2019 IEV Findings

Based on the interview of Syngenta local staff, supported by documentary evidence (participant list and pictures), the “Happy Better Life with Syngenta” Program was implemented. Syngenta has implemented the first two initiatives mentioned above. In 2018, two rounds of farm-level workshops initiated by LLC with assistance of Syngenta were organized in Mon Hin Lek Fai village (Mahawan subdistrict) on 25 April 2018 and 11 May 2018 respectively. The two workshops discussed about labor rights and birth registration for migrant children. In 2019, two trainings for workers were organized. The first time was on 18 January 2019 in Mon Hin Lek Fai village with workers of several employers. There were speakers from LLC and another local NGO to discuss about health and safety and a private health insurance ran by an NGO. On 15 October 2019, there were a health officer from a subdistrict hospital and a representative of Office of Employment. The first speaker talked about health and safety whilst the latter speaker talked about legal ways to hire migrant workers in Tak. Syngenta was put in touch with the latter speaker through the help of LLC.

In addition, Syngenta staff confirmed there were “on the spot” trainings to familiarize workers with Syngenta staff in order to make them receptive to their advice on the FLA code. This was primarily undertaken in the areas of Tee Kaper village (in Chong Kaeb subdistrict) and villages in Mahawan subdistrict. However, during the verification, there was no harvesting activity in Teekaper, yet assessors visited two farms in Mahawan. None of the workers said they had ever participated in these trainings.

One farmer who was in charge at a farm in Saw O said his brother was the farm owner. Thus, he has never participated Syngenta’s pre-production trainings although they have been supplying for Syngenta for 5-6 years. However, he knows about child labor ban and safety issues. He does not have any long-termed/ regular workers. All his workers are employed daily, recruited from workers in the surrounding areas. In this farm, assessors found up to 3 child labor. Some of the parents said they were not informed about child labor. Most workers did not wear proper PPE. Some were wearing flip flops and without gloves working. Those who have PPE were not informed by the farm’s owner, but they prepared by themselves.

Additionally, Syngenta has made a notice of the size of 40 x 25 CM with signs and graphics connoting safety, no child labor, and a very small sign of FLA code of conduct in Thai and Burmese. According to Syngenta, the notice is installed in every farm with the farmer’s name at the bottom. Of the 8 farms verified, there were at least two farms without this notice. Asking the farmers and workers, none of them could tell what are on the notice.

Syngenta staff shared that there are more bigger sizes of posters developed. These are only attached in a few places used as venue for worker gathering. Whilst these venues are village head’s where villagers would often visit, it is not clear whether these are places that the workers frequently visit or not. They mostly convey safety instruction. Syngenta staff used “google translation” to translate from Thai into Burmese. They verified the

accuracy through asking workers and when the posters were attached in October last year; they asked the workers around there to ensure that they understood the content. The verification team went to a village head house in Mon Hin Lek Fai and found these posters. The Burmese-Thai translator found many translation mistakes that make the entire message confusing and misleading. The translator also asked the two Burmese workers around there to read them as well. They also said they did not understand.

Last, Syngenta has developed a manual on health and safety working in the farm. The complete one is only available in Thai and not yet distributed.

Overall Conclusion

Some progress made but still need sustainable improvement

The trainings were conducted in a small number of villages. There were up to 60 participants each time (verified by signed participant name lists). As the verification had to be conducted in the farms with harvesting activities, it was hard to find any workers to verify the occurrence and the impact of the trainings. However, the awareness of the interviewed farmers is pretty much confined to child labor and PPE, and virtually non-existent when it comes to other aspects of the FLA codes. Besides, to harvest, a lot of daily workers are needed, and these workers were hardly informed about the code of conduct and they had to bring their own PPE. Only a few regular workers who said they were provided with PPE by their employer. Information and communication materials on FLA codes were produced but with poor translation quality.

Follow-up Action Plan (to be filled by the company):

1. **Trainings and awareness sessions:** Syngenta field production team will continue the effort of conducting more number trainings and awareness session to reach all the growers and workers in the production activity. Every grower shall be reached three times in a crop cycle during pre-planting, de-tasseling and harvesting and explain the FLA commitment, field safety and safe chemical management. We could reach around 200 growers in last completed season and it will be extended to larger number of growers in upcoming season. If any grower not able or missed to attend the sessions, they will be reached out during one-to-one session by field production team while they are in routine field visits.

At least once in a crop cycle a formal trainings or awareness session and informal sessions during farm visits by the field production shall be organized for temporary and permanent workers, and explain the FLA commitment, field safety and safe chemical management. They are going to use various communication tools and medias to explain these.

Syngenta field production team has field supervisors who knows Burmese language and selected them as master trainers to deliver the trainings to growers and workers
2. **Communication Tools:** Syngenta has developed various communication tools such as posters, t-shirts (printed with FLA Codes), etc. In addition to this, field production team has power point presentations with animated video clips and pictographs. Also, the team has planned to design flip charts, booklets / hand manuals with more pictorial messages.

These tools and medias shall be translated properly to all the languages the workers are comfortable to read and understand it.

The professional translator will be consulted to translate all the tools into the workers language.
3. **Safety Kits -PPE:** Syngenta always supplies minimum PPEs to all the farm workers

	<p>within limit of available budget provisions, such as rubber and cloth hand gloves, surgical masks, Protective T-shirt (FLA branding), etc. In addition to this, growers shall be encouraged to provide further basic protective equipment to their workers. Syngenta field production team provide enough training to growers on safe use of PPE and it is the responsibility of grower to convey this message to next level.</p> <p>The field production team will monitor the farms regularly during their routine field visit and verify the knowledge level, usage of tools, PPEs usage etc., and it shall be recorded also.</p>
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<p>Deadline Date (to be filled by the company)</p>	<ul style="list-style-type: none"> • Raising awareness or training to growers on 3 topics – 100% - Every year • Raising awareness or training to permanent workers – 100% - By 2021 • Raising awareness or training to temporary / migrant workers – 100% - By 2025 • Revise and usage communication tools & media – 2020 • Safety Kit Distribution – Every season (based budget provision)
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Wage Advances (2017)

<p>Benchmarks: <i>ER.15.2: Advances shall only be made following clearly established rules, which have been communicated to workers.</i> <i>ER.15.2.1: Advances must be properly documented and their receipt and accuracy must be confirmed by the recipient worker, in writing whenever possible (e.g. signature, thumbprint).</i></p>	<p>Noncompliance in one farm</p>
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<p>Findings/Noncompliance Explanation:</p>	<p>Farmers and workers agree on some broad terms and conditions. There is no transparent and accountable system. No records are made about advances made to the workers. In a farm where workers are paid at the end of the year (after two crops), workers can have advances for their daily consumption; the total advances are deducted from the workers' total pay in a lump sum. One farmer claimed that he did record the advances, but it was at home and thus cannot be shown.</p> <p><u>Source:</u> Interviews with workers, farmers, and observation</p>
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<p>Company Action Plan:</p>	<p>Syngenta has been promoting the use of GDKs (grower documentation kits) among the farmers. This practice has been ongoing for 3 years. There is a general idea about the usage of the system, however, Syngenta will now encourage the farmers that they must maintain the records in the farms during the high production process, sharing the same with the auditor.</p> <p>To strengthen the system, Syngenta local field staff will select two groups of farmers in different villages to help them get acquainted with local law and regulations. The training meetings shall be facilitated with the help of LLC. These selected groups of farmers will further provide training to other farmers in the village. The Syngenta internal audit team will also monitor the wage records in the GDKs. This practice shall be expanded for all the regions in each season, enabling them to achieve 100% of the farms by 2020.</p>
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<p>Deadline Date:</p>	<p>Start training in wet season 2018 and retraining in dry season 2019, reaching all 100% farms by 2020.</p>
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2019 IEV Findings

According to Syngenta, they still continue to distribute GDKs to farmers to document advances and pays. But no groups of farmers and workers have been selected to strengthen the system. In 2017, there was only one farm who used the distributed GDKs but it turned out that the records were fraud as they did not reflect the workers' actual pay. In this verification, there is none of the farmers who are aware of, let alone receiving the GDK from Syngenta. One farmer initiated distribution of accounting notebook for all of her workers. All of them have to bring their personal notebook to receive their pay and sign it every time, and they keep the book to themselves. Two other farmers keep their accounting notebook to themselves and the workers have to sign in this book for every pay. For the rest of the farmers, there was no system of keeping record. However, there was no complain from the interviewed workers about their pay apart from one worker whose husband, a regular worker, agreed with his employer to get collective pay all at once after the crop is sold. This means that he has not received any pay since the start of the crop season.

Overall Conclusion	<p>Further improvements are needed</p> <p>Although Syngenta claim to continue distributing the GDK, there is no evidence to support that. None of the farmers gave information to support this claim. There is no other initiatives by Syngenta on this regard.</p>
Follow-up Action Plan (to be filled by the company):	<p>Syngenta field production team and FLP Lead will revise the GDK (grower documentation kits) template with more user-friendly version. The responsibility of maintaining and recording the attendance, working hours and wage payments shall be given to growers, he will record the details of workers that he engaged in his farm.</p> <p>Field production will help the growers to understand the template and if any support required while filling the details, shall be given during their field visit. During pre-season meeting, raised awareness among the farmers.</p> <p>This template will be distributed to all the farmer before start of the activity in the farm, probably during pre-season meeting with the farmers.</p>
Deadline Date (to be filled by the company)	<p>Revise the GDK template – By Dec 2020</p> <p>Raising awareness among the farmers – March 2021</p>
Worker Involvement (2017)	
<p>Benchmarks:</p> <p><i>ER.18.1: Employers shall have a clear and transparent system of worker and employer communication that enables workers to consult with and provide input to the employer or the company management. This might include regular conversation between workers and employer, suggestion boxes, workers' committees, designated spaces for worker meetings, and meetings between employer and workers' representatives. For small farms with informal labor structures, this means that the workers can openly reach and communicate with the producer/farmer.</i></p>	Noncompliance in one farm
Findings/Noncompliance Explanation:	<p>In one of the visited farms, the head worker who is the main coordinator/ translator between the employer and workers shared different stories about the working conditions of the workers. Some workers stated that they did not feel their opinions would be heard, as they shared concerns about delayed and low wages with the employer but nothing changed. In some farms, farmers and workers said that farmers treat their workers like family members. However, when it comes to negotiating about better working conditions, no workers feel empowered to do so.</p> <p><u>Source:</u> Interviews farmers, worker head, workers</p>
Company Action Plan:	<p>Syngenta will facilitate dialogue with farmers, to strengthen the internal channels of communication between farmers and workers, by enabling a common platform for addressing issues during pre-season meetings. In addition, Syngenta local field staff will select the group of farms in two villages, which would also include workers belonging to Myanmar, to conduct the training by Syngenta staff and LLC, on the</p>

	various methods of grievance handling process and importance of establishing grievance redressal systems. This information shall be further expanded to other villages and farms, with the help of key farmers selected to impart the information. This way, Syngenta aims to achieve the training in all farms by 2020.
Deadline Date:	Start training in wet season 2018 and retraining in dry season 2019, reaching all 100% farms by 2020.
2019 IEV Findings	
<p>Apart from the notice with hotline information (previously mentioned in the “Terms and Conditions” section) supposedly installed in every farm, Syngenta produced bigger posters with hotline numbers only attached to a few places including two houses of village head which is, according to Syngenta, are venues often used for gathering of workers. The assessment team went to one village head’s house. According to the Burmese-Thai translator, the translation is wrong. Of all the workers interviewed, there are only two workers who recognize and know what “Syngenta” mean. Others do not know about Syngenta. Thus, they did not know about the hotline number. Syngenta local staff said they have never received a labor-related complaint which is similar to the findings in 2017. The complaint boxes installed by Syngenta that were found in 2017 have disappeared.</p> <p>As for other initiatives mentioned above, nothing has been done.</p>	
Overall Conclusion	Still need sustainable improvement Workers awareness on grievance mechanism was virtually non-existent. The translation on the notice boards is also wrong. Nothing else has been done as per the 2017 action plan.
New findings:	The assessment team went to the particular farm identified as troublesome in the 2017 findings about wage advances and worker involvement although there was no harvesting activity there. Assessors interviewed the workers met in 2017 and found that their wages of many months are withheld as the employer did not have the capacity to pay on time. Assessors informed Syngenta who did not know about the issue before but confirmed that this farmer is still contracted with Syngenta but they insisted that Syngenta has paid the farmer properly every crop. This is therefore a problem between the farmer and the workers.
Follow-up Action Plan (to be filled by the company):	<p>Syngenta field production team has done further investigation on this issue and had dialogue with grower and workers. The issue has been resolved and both the parties are happy with that solution.</p> <p>Syngenta planned to establish a compliant box to collect the grievances from the workers and this will be installed where it is easy to access by them, example in farms or worker’s camp. FLA country manager only will be responsible to open the box and collect the complaints, he will open it once in a week.</p> <p>Enough communication will be disseminated to workers on this during farm level workers awareness. The details of grievance boxes shall be given in all the communication tools such as posters, digital media, etc.</p>
Deadline Date (to be filled by the company)	<p>Establishing complaint box in all the areas – Mar 2021</p> <p>Raise awareness among the workers on grievance channel – Mar 2022</p>

Right to Organize and bargain (2017)

Benchmarks: <i>ER.19: Employers shall respect all laws, rules and procedures protecting the rights of workers to organize, bargain collectively, and participate in strikes consistent with ILO principles and jurisprudence.</i>		Risk Noncompliance in one farm
Findings/Noncompliance Explanation:	<p>In one farm, there was a negotiation between the workers and the farmers on increasing wages, two years ago. According to the workers, the farmer got angry and argued with the worker’s representative. However, as a result of the discussion, the wage was raised from THB 130 to THB 150 per day. However, other benefits such as break time, rice, and new year gifts were cut off. The tension increased ever since, making the representative eventually leave the farm. Those who still work on the farm subsequently feel uncomfortable to bargain with the farmer. Workers further stated that the THB 150 wage is relatively lower compared to other farms in the area. Moreover, the payments are also delayed. They haven't received the wage for almost three months. Even when they can ask for wage advance, it's only a little amount of money they receive. Still, they don't want to further negotiate as they attempt to avoid tension with the farmer.</p> <p><u>Source:</u> Worker interview</p>	
Company Action Plan:	<p>Syngenta has not been informed about this dialogue between farmers and workers. From the current season onwards, Syngenta has been emphasizing to farmers, during the pre-season meetings, about the importance of dialogue and allowing Syngenta intervention in the process to make the dialogue more concrete. Syngenta staff shall help to create a training session with farmers which would provide them with an understanding and knowledge on local labor laws. They shall be further engaged to provide information with their workers. The existing channels of grievance systems such as helpline numbers and suggestion boxes shall be emphasized. Syngenta will establish local contacts with individuals or organizations which can help create tools for Burmese and Karenese-speaking workers. Internal monitoring visits will further communicate to the Syngenta IMS center in order to manage the reported issues.</p>	
Deadline Date:	Starting from May 2018 and covering 100% of workers by 2020	
2019 IEV Findings		
<p>As for farmers, Syngenta provides usual production trainings for farmers for every crop cycle (described more in the finding for the “Employment and Relationship”). At the end of each training, farmers are primarily informed about child labor and PPE and to some extent on the hiring of legal workers. Nothing more has been done in order to raise awareness of farmers about labor rights and to facilitate dialogue between farmers and workers. There are some farmers using the helpline to inquire about production aspects but not about labor aspects according to Syngenta. Some of the interviewed farmers saw the numbers but have yet to use it.</p> <p>Based on interview with LLC, they have only trained workers, not farmers.</p>		
Overall Conclusion	Still need sustainable improvement	
Follow-up Action Plan (to be filled by the company):	<p>1. Trainings and awareness sessions: Syngenta field production team will continue the effort of conducting more number trainings and awareness session to reach all the growers and workers in the production activity. Every grower shall be reached three times in a crop cycle during pre-planting, de-tasseling and harvesting and explain the FLA commitment, field safety and safe chemical management. We could reach around 200 growers in last completed season and it will be extended to larger number of growers in upcoming season. If any grower not able or missed to attend the sessions, they will be reached out during</p>	

	<p>one-to-one session by field production team while they are in routine field visits.</p> <p>At least once in a crop cycle a formal trainings or awareness session and informal sessions during farm visits by the field production shall be organized for temporary and permanent workers, and explain the FLA commitment, field safety and safe chemical management. They are going to use various communication tools and medias to explain these. All these modes will always cover the topic related grievance mechanism</p> <p>Syngenta field production team has field supervisors who knows Burmese language and selected them as master trainers to deliver the trainings to growers and workers</p> <p>2. Communication Tools: Syngenta has developed various communication tools such as posters, t-shirts (printed with FLA Codes), etc. In addition to this, field production team has power point presentations with animated video clips and pictographs. Also, the team has planned to design flip charts, booklets / hand manuals with more pictorial messages.</p> <p>These tools and medias shall be translated properly to all the languages the workers are comfortable to read and understand it.</p> <p>The professional translator will be consulted to translate all the tools into the workers language.</p> <p>The field production team will monitor the farms regularly during their routine field visit and verify the knowledge level and it shall be recorded also.</p>
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<p>Deadline Date (to be filled by the company)</p>	<p>Raising awareness or training to growers on 3 topics – 100% - Every year</p> <p>Raising awareness or training to permanent workers – 100% - By 2021</p> <p>Raising awareness or training to temporary / migrant workers – 100% - By 2025</p> <p>Revise and usage communication tools & media – 2020</p>
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Work Rules and Discipline (2017)

<p>Benchmarks:</p> <p><i>ER.20.1: Employers shall have disciplinary rules and practices that embody a system of progressive discipline (e.g. a system of maintaining discipline through the application of escalating disciplinary action moving from verbal warnings to written warnings to suspension and finally to termination).</i></p> <p><i>ER.20.2: Any person supervising workers shall be aware of the disciplinary rules and practices.</i></p> <p><i>ER.20.4: The disciplinary system shall be applied in a fair and nondiscriminatory manner and include a management review of the actions by someone senior to the manager who imposed the disciplinary action.</i></p> <p><i>ER.20.6: Disciplinary rules and practices shall be clearly communicated to all workers.</i></p> <p><i>ER.20.7: Workers must be informed when a disciplinary procedure has been initiated against them.</i></p> <p><i>ER.20.8: Workers have the right to participate and be heard in any disciplinary procedure against them.</i></p> <p><i>ER.20.11: The disciplinary system shall include a third-party witness during imposition, and an appeal process. In case of smallholder settings, existing appeal mechanism at community level is acceptable.</i></p>	<p>Noncompliance in all farms</p>
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<p>Findings/Noncompliance Explanation:</p>	<p>No existence of systemic disciplinary rules was found although no interviewed workers mentioned that they had experienced being disciplined or had seen any workers being disciplined.</p> <p><u>Source:</u> Interview with workers</p>
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<p>Company Action Plan:</p>	<p>The policy for seed production suppliers is already developed in the contract. The Syngenta field team will develop one page and easy to understand policy for the workers, to help farmers to communicate. For the workers, this one-page policy shall be posted at the farmer house and worker residence in the Thai and Burmese languages. In addition, Syngenta will facilitate a training program to support the</p>
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	farmer about the labor law conditions.
Deadline Date:	Develop a policy of disciplinary and implement it by the end of 2018.

2019 IEV Findings

According to Syngenta, no one-page policy on disciplinary has been developed yet. There were trainings in collaboration with LLC about basic labor rights. Nothing specifically about disciplinary system was discussed.

There has been production of notices and posters which primarily emphasize child labor, work safety and vaguely about FLA codes. From the interview, Syngenta staff, farmers, workers never mentioned anything about disciplinary system. Besides, Syngenta' posters and notices also do not convey messages about disciplinary system. Syngenta's power point for farmers training discussed FLA code of conduct with a graphic and shorthand on all elements but when topics are expanded into bullet points, only HSE and child labor are discussed.

Overall Conclusion	Still need sustainable improvement
Follow-up Action Plan (to be filled by the company):	<p>1. Trainings and awareness sessions: Syngenta field production team will continue the effort of conducting more number trainings and awareness session to reach all the growers and workers in the production activity. Every grower shall be reached three times in a crop cycle during pre-planting, de-tasseling and harvesting and explain the FLA commitment, field safety and safe chemical management. The topic on FLA commitment training will also include the details related policy on disciplinary practices. At least once in a crop cycle a formal trainings or awareness session and informal sessions during farm visits by the field production shall be organized for temporary and permanent workers, and explain the FLA commitment, field safety and safe chemical management. They are going to use various communication tools and medias to explain these. All these modes will always cover the topic related grievance mechanism</p> <p>2. Communication Tools: Syngenta has developed various communication tools such as posters, t-shirts (printed with FLA Codes), etc. In addition to this, field production team has power point presentations with animated video clips and pictographs. Also, the team has planned to design flip charts, booklets / hand manuals with more pictorial messages.</p> <p>These tools and medias shall be covered the topics related to all policies and procedures and translated properly to all the languages the workers are comfortable to read and understand it.</p> <p>The field production team will monitor the farms regularly during their routine field visit and verify the knowledge level and it shall be recorded also.</p>
Deadline Date (to be filled by the company)	<p>Raising awareness or training to growers on 3 topics – 100% - Every year</p> <p>Raising awareness or training to permanent workers – 100% - By 2021</p> <p>Raising awareness or training to temporary / migrant workers – 100% - By 2025</p> <p>Revise and usage communication tools & media – 2020</p>

Grievance Procedures (2017)

Benchmarks:

ER.25.3: FLA-affiliated companies shall make sure that a confidential non-compliance reporting mechanism is available for farmers and workers in the supply chain (such as members of cooperatives or suppliers of seed organizers). Through this channel, any code violation can be communicated to the company if the local and farm level grievance redress mechanisms fail to sufficiently address the issue.

**Noncompliance
in all farms**

Findings/Noncompliance Explanation:	<p>There is a written grievance procedure shared with company staff in Thai, yet effective communication to the farmers and workers is not made. Farmers are expected to inform the workers or workers are expected to identify what is written on the poster. Despite the presence of posters in all the farms, none of the workers interviewed had any knowledge of the purpose of the number. Additionally, the hotline operator only speaks Thai, while some workers speak Burmese or Karenese.</p> <p><u>Source:</u> Interview with company staff, worker interviews</p>
Company Action Plan:	<p>Syngenta has developed two channels of reporting grievances - helpline telephone number and the grievance box installed at Syngenta office, seed organizer and worker residence. The systems have already been communicated to every farmer and worker since 2017, including communication materials like posters, GDK, shirts, small cards etc. This year, Syngenta will add a number of Karen-speaking staff in those posters and post it in those areas where the workers are predominant in the region. In addition, the grievance box installed at the seed organizer house, worker houses/communities were accessible for the workers. The box will be placed at the worker living area and the Syngenta team will select groups of workers based on the data collected from the previous wet season. The detail of how to address the grievances through these methods shall be recorded. The internal monitoring system will be strengthened during the season to create the awareness of this channels and the dedicated field staff will take over on the action implementation of training, follow up, and report on the progress.</p>
Deadline Date:	Starting from dry season 2018 and covering 100% of workers by 2020

2019 IEV Findings

Apart from the notice with hotline information (previously mentioned in the “Terms and Conditions” section) supposedly installed in every farm, Syngenta produced bigger posters with hotline numbers only attached to a few places including two houses of village head which, according to Syngenta, are venues often used for gathering of workers. Assessors went to one village head’s house to verify about these notices and posters. According to the Burmese-Thai translator, the translation is not accurate. Of all the workers interviewed, there are only two workers who recognize and know what “Syngenta” means. Others do not know about Syngenta. Thus, they did not know about the hotline number. Yet, the two workers also did not know about the hotline. Syngenta local staff reported that they have never received a labor-related complaint which is similar to the findings in 2017. They have not added any Karen-speaking staff to handle the hotline. The complaint boxes that were found in 2017 have now disappeared.

As for other initiatives mentioned above, nothing has been done.

Overall Conclusion	<p>Still need sustainable improvement</p> <p>Communication materials have been developed with crucial translation mistakes. Nothing else has been implemented as per the 2017 action plan.</p>
Follow-up Action Plan (to be filled by the company):	<p>Syngenta has developed various communication tools such as posters, t-shirts (printed with FLA Codes), etc. In addition to this, field production team has power point presentations with animated video clips and pictographs. Also, the team has planned to design flip charts, booklets / hand manuals with more pictorial messages.</p> <p>These tools and medias shall be covered the topics related to all policies and procedures and translated properly to all the languages the workers are comfortable to read and understand it. Professional translator’s service will be utilized to translate</p>

	<p>into worker's language (e.g.: Burmese)</p> <p>Syngenta field production team will continue the effort of conducting more number trainings and awareness session to reach all the growers and workers in the production activity. At least once in a crop cycle a formal trainings or awareness session and informal sessions during farm visits by the field production shall be organized for temporary and permanent workers, and explain the FLA commitment, field safety and safe chemical management, also explain about the grievance mechanism (hotline number and compliant box). The team decided to use various communication tools and medias to explain these topics and all the modes will always cover the topic related grievance mechanism</p> <p>The field production team will monitor the farms regularly during their routine field visit and verify the knowledge level and it shall be recorded also.</p>
<p>Deadline Date (to be filled by the company)</p>	<ul style="list-style-type: none"> • Raising awareness or training to growers on 3 topics – 100% - Every year. • Raising awareness or training to permanent workers – 100% - By 2021. • Raising awareness or training to temporary / migrant workers – 100% - By 2025. • Revise and usage communication tools & media – 2020

Nondiscrimination

2017 Assessment Findings

<p>Recruitment and Employment Practices (2017)</p>	
<p>Benchmarks: <i>ND.2.1: Recruitment and employment practices shall be free from any type of discrimination.</i> <i>ND.2.3: If not provided by law, employers must provide protection to workers who allege any type of discrimination in recruitment and employment practices.</i></p>	<p>Noncompliance in all farms</p>

<p>Findings/Noncompliance Explanation:</p>	<p>Recruitment with racial bias was observed among Karen-speaking farmers who would prefer Karen-ethnic workers to Burmese workers as they speak the same language. Also, they believe that Burmese workers are not as hard-working as Karen. Additionally, it was observed that farmers tend to recruit men to do the type of work paid higher than the type of work mostly done by women.</p> <p><u>Source:</u> Interviews and observation</p>
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<p>Company Action Plan:</p>	<p>Syngenta has developed a production policy which is included in the seasonal production contract. The policy is related to the Thai law that “<i>supplier shall ensure that hiring, placement, remuneration, advancement, training and disciplinary decisions within the Supplier are consistent with local law. If there are no local laws prohibiting discrimination in the workplace Supplier agrees not to make any employment decisions on an individual's gender, age, nationality, ethnicity, race, color, creed, caste, language, disability, organizational membership, opinion, health status, marital status, maternity, sexual orientation, or the employee's civic, social, or political distinctiveness</i>”.</p> <p>Syngenta shall create awareness of gender, age and race discrimination and emphasize this with the farmers during meeting at least 3 times/season. The GDK is initiated and distributed to 100% of the farmers since 2017 with the aim to ensure that farmer's awareness of the age and gender verification system via phase-wise intervention.</p> <p>Syngenta has plans to: (1) arrange training for farmers, workers and staff members on</p>
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	the policy, (2) monitor the implementation of the procedure at the farm level, (3) develop supporting documentation, (4) review and analyze cases of repeated non-compliances.
Deadline Date:	Training on the policy for selected a group of farmers and workers as a pilot in the Wet season 2018 (April 2018) and the monitoring system will follow up in this pilot group by dry season 2018/19 and will expand to cover 100% of farmers by 2020.
2019 IEV Findings	
There are training for farmers, yet the brief time devoted for FLA codes was only confined to child labor and HSE. GDK has been distributed according to Syngenta, but no farmers and no workers confirmed this information. Nothing else has been implemented as per the action plan.	
Overall Conclusion	Still need sustainable improvement
Follow-up Action Plan (to be filled by the company):	<p>Every season, an exclusive refresher training shall be arranged for Syngenta field production which helps reiterate the knowledge on FLA standards and its benchmarks. The issue of discrimination is a sensitive matter and require special attention to manage this. So, these refresher training help to improve the communication and management skill of the team.</p> <p>Syngenta field production team will continue the effort of conducting more number trainings and awareness session to reach all the growers and workers in the production activity. Every grower shall be reached three times in a crop cycle during pre-planting, de-tasseling and harvesting and explain the FLA commitment, field safety and safe chemical management. The topic on FLA commitment training will also include the details related to non-discrimination. They are going to use various communication tools and medias to explain these. All these modes will always cover the topic related grievance mechanism</p> <p>Syngenta has developed various communication tools such as posters, t-shirts (printed with FLA Codes), etc. In addition to this, field production team has power point presentations with animated video clips and pictographs. Also, the team has planned to design flip charts, booklets / hand manuals with more pictorial messages. These tools and medias shall be covered the topics related to all the code, policies and procedures and translated properly to all the languages the workers are comfortable to read and understand it.</p> <p>Syngenta field production team and FLP Lead will revise the GDK (grower documentation kits) template with more user-friendly version. The responsibility of maintaining and recording the attendance, working hours and wage payments shall be given to growers, he will record the details of workers that he engaged in his farm. Field production will help the growers to understand the template and if any support required while filling the details, shall be given during their field visit. During pre-season meeting, raised awareness among the farmers. This template will be distributed to all the farmer before start of the activity in the farm, probably during pre-season meeting with the farmers.</p> <p>The field production team will monitor the farms regularly during their routine field visit and verify the knowledge level and it shall be recorded also.</p>
Deadline Date (to be filled by the company)	Refresher training – Every season Raising awareness or training to growers - 100% - Every year.

Revise the GDK template – By Dec 2020

Discrimination in Training and Communication (2017)

Benchmarks:

ND.4: Employers shall guarantee that all workers have equal access to training and capacity building and no discrimination takes place based on the characteristics noted above, nor on literacy or location of the workers. Training and communication should be given in the native language accessible to workers.

Risk of noncompliance in all farms

Findings/Noncompliance Explanation:

In some farms, workers only speak Burmese whereas Syngenta training is conducted in the Thai language. As a result, the Burmese / Karenese workers are not able to participate in training, as there is no translation available for them.

Source: Interview with workers

Company Action Plan:

Syngenta had plans to develop the worker’s knowledge of the law and regulations. In the beginning, the selected group workers in 2 villages will be invited to attend the special training course under the topic of fair labor code of conduct and the Thai labor law. Syngenta will facilitate this by inviting a special speaker from LLC and their alliance from the labor and welfare department. This training will be presented in the worker’s language: Myanmar or Karenese, depending on the group of workers. The expected result of this training is the applicable guidelines for the worker to follow the law and local conditions. The IMS process will check the worker knowledge during the dry season of 2018/19.

Deadline Date:

Pilot training program from external experts for selected group worker in 2 villages by wet season 2018 and extend to cover all planting areas by 2020.

2019 IEV Findings

Based on the verbal interview with Syngenta local staff, supported by documentary evidence (participant list and pictures), the “Happy Better Life with Syngenta” Program was implemented. Syngenta has implemented the first two initiatives mentioned above. In 2018, two rounds of farm-level workshops initiated by LLC with assistance of Syngenta were organized in Mon Hin Lek Fai village (Mahawan subdistrict) on 25 April 2018 and 11 May 2018 respectively. The two workshops discussed about labor rights and birth registration for migrant children. In 2019, two trainings for workers were organized. The first time was on 18 January 2019 in Mon Hin Lek Fai village with workers of several employers. There were speakers from LLC and another local NGO to discuss about health and safety and a private health insurance ran by an NGO. On 15 October 2019, there were a health officer from a subdistrict hospital and a representative of Office of Employment. The first speaker talked about health and safety whilst the latter speaker talked about legal ways to hire migrant workers in Tak. Syngenta was put in touch with the latter speaker through the help of LLC.

In all these trainings, there were translation into Burmese.

Overall Conclusion

Issue solved

The actions have been undertaken. In terms of impact, it was hard to evaluate as the verification team did not find anyone who participated in these activities.

Marital or Pregnancy-Related Discrimination (2017)

Benchmarks:

ND.6.1: Employers shall abide by all protective provisions in national laws and regulations benefitting pregnant workers and new mothers, including provisions concerning maternity leave and other benefits; prohibitions regarding night work, temporary reassignments away from work stations and work environments that may pose a risk to the health of pregnant women and their unborn children or new mothers and their new born children, temporary adjustment of working hours during and after pregnancy, and the provision of breast-feeding breaks and facilities.

Noncompliance in all farms

Findings/Noncompliance Explanation:

Whilst no dismissal of pregnant women was found, there is no policy nor guidelines to ensure compliance of the law which would state that the employer shall not terminate the employment of a female employee on the grounds of pregnancy.

	<p>Besides this, employers had no knowledge about protective provisions benefiting pregnant workers and thus there were no provisions in place for their farms.</p> <p><u>Source:</u> Interviews</p>
Company Action Plan:	<p>Syngenta plans to develop the farmer’s knowledge of the law and regulations. In the beginning, the selected group of farmers in 2 villages will be invited to attend the special training course under the topic of fair labor code of conduct and the Thai labor law. Syngenta will facilitate this by inviting a special speaker from LLC, including authorities from the labor and welfare department. This will initiate and provide guidelines including the question/answer session for the local farmers and workers. In the same period, the separate training session will be arranged for the selected group of workers to provide the knowledge of worker’s right. This training will be presented in the worker’s language: Myanmar or Karen depending on the group of the workers. The training will be arranged at least 2 times/season: pre-season and middle of the season.</p>
Deadline Date:	<p>Starting from wet season 2018 (April 2018) for pilot selected group of farmer and workers and will cover 100% of farmers by 2020.</p>
2019 IEV Findings	
<p>Apart from Syngenta’s usual trainings for farmers for every crop cycle, nothing more has been done. In every crop cycle, Syngenta provides three trainings for farmers to discuss about production aspects. Syngenta staff reported that they devote time at the end of every training to emphasize about FLA code of conduct including hiring pregnant women. All farmers interviewed are aware of that and chose not to hire pregnant women in the first place.</p> <p>Based on interview with LLC, they have only trained workers, not farmers.</p>	
Overall Conclusion	<p>Still need sustainable improvement</p> <p>There is no guideline about marital or pregnancy-related discrimination. It’s hard to say whether the farmers have “awareness” about this aspect. But they prevent any malpractice by not hiring pregnant women in the first place. No pregnant women nor any women dismissed on the ground of pregnancy found in the verification.</p>
Follow-up Action Plan (to be filled by the company):	<p>Syngenta will develop policies and procedures on recruitment and termination of workers. Legal support will be taken in finalizing these policies from internal legal team. This policy will also include the terms and conditions related to hiring the pregnant workers.</p> <p>During awareness session with the farmers and workers, these policies and procedures shall be explained to them.</p> <p>These topics will be included in GDK for their reference.</p> <p>The field production will monitor the farms on these criteria during their monitoring visit.</p>
Deadline Date (to be filled by the company)	<p>Create polices and procedure for recruitment and termination of workers – Dec 2020</p> <p>Raising awareness or training to growers - 100% - Every year.</p> <p>Revise the GDK template – By Dec 2020</p>

Forced Labor

2017 Assessment Findings

General Compliance / Freedom in Employment and Movement / Personal Workers Identification (2017)

Benchmarks:

F.1: Employers shall comply with all national laws, regulations and procedures concerning the prohibition of forced labor and human trafficking in any stage of the agriculture production process.

F.9: Workers shall retain possession or control of their passports, identity papers, travel documents, and other personal legal documents. Employers may obtain copies of original documents for record-keeping purposes, or as ID substitute.

**Noncompliance
in all farms**

F.3: Employers shall not bind workers to employment as a condition of fulfilling terms of a debt to a third party or to the employer.

F.7: Employers shall not utilize practices that restrict workers' freedom of movement or ability to terminate his or her employment. Examples of such practices include, but are not limited to:

F.7.6: partially or fully retaining salaries, benefits or any other rights acquired by workers or stipulated by law;

in one Farm

F.4.2: No employment term or disciplinary practice shall confine or restrict workers' freedom of movement.

F.7.5: denying and hampering access to, and renewal of, identity papers and/or work permits or any other personal legal (identification) documents;

in two Farms

**Findings/Noncompliance
Explanation:**

There is a provision in the new law that prohibits the confiscation of worker's documents. However, it was observed that none of the farmers were aware of this provision. The farmers' understanding of forced labor was only limited to physical and mental coercion, particularly in the forms of threats and intimidations.

Retaining workers' documents is quite common, like work permit documents and worker IDs that are kept by the farmers. This has a consequence on the worker's mobility as they need to carry the documents to prevent any prosecution and/or extortion by police. For instance, one farmer recounted an experience of a former worker who was extorted by the police, so he told his workers not to go into town and he kept the workers' ID and work permit allegedly for safekeeping. In another instance in other farms, it was observed that workers were paid only after ten months. This arrangement discourages workers from terminating their employment whenever they like.

Source: Interviews with workers and farmers; documentation.

Company Action Plan:

Syngenta plans to develop the farmers' knowledge regarding the law and regulations. In the beginning, the selected group of farmers in 2 villages will be invited to attend the special training course under the topic of fair labor code of conduct and the Thai labor laws. Syngenta will facilitate this by inviting special speakers from LLC and their alliance, including authority from labor and welfare department. This will provide guidelines including the question/answer session for the local farmers and workers.

After training on the law and regulations, Syngenta will emphasize the audit process related to the GDK record. Fair Labor manager and dedicated field staff will continue to extend the training on the topic of how a documentation kit has to be maintained at the farm level by the farmer. This documentation kit will contain workers' information such as name, age, wage, working hours etc. for internal audit by field production staff.

The training will be arranged at least 2 times/season: pre-season and middle of the season.

Deadline Date:

Starting from wet season 2018 (April 2018) for pilot selected group of farmer and workers and will cover 100% of farmers by 2020.

2019 IEV Findings

On 15 October 2019, a representative of the Provincial Office of Employment, Ministry of Labour was invited to talk about workers documentation and legal avenues to hire workers legally. The participants were mostly workers, not farmers. As assessors did not find any workers who participated in this event, it is impossible to verify the impact.

As most of workers found during the verification did not have legal documentation, to have the “semi-legal” card with them, and not confiscated by their employer, did not prevent them from getting arrested or help them to get access to any social service.

LLC has yet to collaborate with Syngenta to provide training to farmers.

Overall Conclusion

Still need sustainable improvement

There was a training on worker documentation and hiring, but the workers were targeted not the farmers. There were 68 participants. Nothing else in the action plan has been implemented.

New findings (If any):

None

Follow-up Action Plan (to be filled by the company):

This is nationwide issue, there is no legal documents available with migrant workers. Syngenta has already launched the program to address this issue with collaboration of LCC, ILO and FLA.

With the support of LCC and ILO, decided to arrange more awareness session for farmers and workers, the experts from these organization will communicate the importance of legal documents for the workers.

Deadline Date (to be filled by the company)

Collaboration and facilitation of establishing legal profiling and documentation with LLC – March 2021

Raise awareness among the growers – Every season

Raising awareness or training to permanent workers – 100% - By 2021

Raising awareness or training to temporary / migrant workers – 100% - By 2025

Child Labor

2017 Assessment Findings

General Compliance / Minimum Age (2017)

Benchmarks:

CL.1: Employers shall comply with all national laws, ratified international conventions, fundamental labor rights, regulations and procedures concerning the prohibition of child labor.

CL.2: Employers shall comply with ILO Convention 138 and shall not employ anyone under the age of 15 or under the age for completion of compulsory education, whichever is higher. If a country has a specified minimum age of 14 years due to insufficiently developed economy and educational facilities, employers might follow national legislations but must work to progressively raise the minimum age to 15 years.

Risk of noncompliance in one farm

Findings/Noncompliance Explanation:

There is no awareness about the law concerning child labor under the agricultural sector (the Ministerial Regulation concerning Labor Protection in Agricultural Work 2014 which is an amended version of the Ministerial regulation with the same title enforced in 2004), but all of the farmers are aware of the company's prohibition of child labor.

	<p>In one farm, a worker mentioned that a child aged 14 years had been working on the farm although she was not seen during the farm visit.</p> <p><u>Source:</u> Interview with 3 workers. Only one worker mentioned this.</p>
Company Action Plan:	<p>Syngenta has promoted the policy of child labor in the production contract since 2017. Syngenta will refresh and emphasize to all farmers regarding the issue of child labor happening in the field as follows:</p> <ol style="list-style-type: none"> 1. During the pre-season meeting, the child labor policy will be emphasized. 2. For the development of policy, Syngenta has planned to <ul style="list-style-type: none"> - Advise farmers that Burmese migrant workers either leave their children with other family members in Myanmar, if not possible, they must carry the necessary documents for their children to facilitate access to education at the Myanmar learning centers or Thai local school. - Coordinate with the local government to take care of the education of the migrant workers' children, allowing them to study at school with support from the seed organizer. - Implement the child education project in the current production village by Fair Labor manager/dedicated staff will encourage the local school or learning center to accept some of the children of migrant workers. 3. The internal monitoring system will be implemented for worker Verbal information on the prohibition of child labor in fieldwork.
Deadline Date:	<p>Involve the local school/learning center in current production villages by the end of 2018</p> <p>Internal monitoring - Thrice in each crop in 20% sample farms (Vegetative, pollination and harvesting period)</p>
2019 IEV Findings	
<p>Apart from Syngenta's usual trainings for farmers for every crop cycle, nothing more has been done. In every crop cycle, Syngenta provides three trainings for farmers to discuss about production aspects. Syngenta local staff reported that they devote time at the end of every training to emphasize about FLA code of conduct including child labor. All farmers are aware that child labor is not allowed, but, according to the interviews, not to have children in the field is not possible as leaving children at home by themselves is not a good choice. There were some daily workers who said they did not know about child labor ban. There were a few workers interviewed who know and admitted that it was not possible for them not have their young children work as it will not be sufficient to feed the entire family.</p>	
Overall Conclusion	<p>Still need sustainable improvement</p> <p>Except for the ongoing training provided to the farmers, no other action has been implemented as per the 2017 action plan</p>
New findings:	<p>During the verification visit, there were more child labor cases in the field than what was found in 2017. However, none of them had documents to verify their exact age. After discussing at length with the kids and their parents, they finally admitted at the end that they were younger than 15. There were 6 child workers in 4 farms where assessors found child labor at work, while in one farm there was a kid around and from our conversation with the parents, they admitted that sometimes the kid works</p>

	<p>there too. Of the 4 farms, there was one farm where assessors found more than one child working. All of these children, both child workers and non-working children in the premises are migrant workers' children. They helped their parents/ grandparents collected corns.</p>
<p>Follow-up Action Plan (to be filled by the company):</p>	<p>We found this issue more in migrant worker's group due to movement of workers from place to place and staying in farmhouse or resting place provided by the farmer. Syngenta field production will focus more on child labor incidences and effort will be taken to eradicate completely from the seed production activity.</p> <p>The field production team will continue the effort to raise awareness among the growers and all types of workers on all FLA CoC including in child labor and promoting child education. Before start of the season or crop activities, mapping will be done in all the farms about the workers staying in farms or farm-house. If the children found in workers group, encouraged them to admit to nearby schools.</p> <p>The team will identify the local schools, where it can be easily accessible to the worker's children and facilitated to admit migrant worker's children to temporary schools running by local authority. Local authorities support shall be taken to admit the children</p> <p>The monitoring of farms shall be strictly implemented in all the farms, the field production team will inspect every farms and workers during their routine visits to the farms., recording will be also done to track the child labor incidence.</p>
<p>Deadline Date (to be filled by the company)</p>	<p>Raise awareness among the growers and workers on FLA CoC – Every season</p> <p>Monitoring of farms – At least once in a week</p>
<p>Young Workers (2017)</p>	
<p>Benchmarks:</p> <p><i>CL.6.1: Employers shall comply with all relevant laws that apply to young workers, (e.g., those between the minimum legal working age and the age of 18) including regulations related to hiring, working conditions, types of work, hours of work, proof of age documentation, and overtime.</i></p> <p><i>CL.6.2: Employers shall maintain a list of all young workers, their entry dates, proof of age and description of their assignment.</i></p>	
<p>Noncompliance in all farms</p>	
<p>Findings/Noncompliance Explanation:</p>	<p>None of the assessed farms keep a list of young workers. Proof of age documentation could not be shown during the interviews.</p> <p><u>Source:</u> Interviews with farmers and workers</p>
<p>Company Action Plan:</p>	<p>The policy of child labor and implementation in the field as follow:</p> <ol style="list-style-type: none"> 1. Refresh training during the pre-season meeting 2. Request the farmer to collect a list of their permanent worker on young and children in wet season 2018. 3. Syngenta plans to: (1) train a selected group of farmers and workers at least two villages as a pilot and staff members on the policy, (2) promote and monitor the implementation of the procedure at the farm level (3) develop supporting documentation, (4) review and analyze cases of repeated non-compliances, all activity planned to start during the season 2019, and so on.
<p>Deadline Date:</p>	<p>Refresh policy and collect young worker list in wet season 2020.</p> <p>Create an action to improve issues with the pilot group of farmers and workers in dry season 2018/19 and so on.</p>

2019 IEV Findings

Apart from Syngenta's usual trainings for farmers for every crop cycle, nothing more has been done.

No list of permanent/ regular workers are maintained. No farmers have been told to do so. Syngenta staff said they will start doing this in April this year.

Overall Conclusion

Still need sustainable improvement

Follow-up Action Plan (to be filled by the company):

Syngenta field production team will arrange the meetings cum awareness sessions with the growers and workers. During these sessions, the growers and workers shall be motivated to collect the age proofs from all the young workers. Initial focus shall be given to permanent workers and later it can be extended to migrant workers also.

Before start of the season or crop activities, the field production team will conduct the mapping of young workers and children especially in migrant workers group and prepare a list to take further action on this.

GDKs will be utilized to record the data of young workers and age proofs also maintained along with this.

Deadline Date (to be filled by the company)

Collection of age proofs of all young workers – 31 March 2021

Mapping of children in the farms or workers camp – Dec 2020

Raise awareness among the growers and workers on FLA CoC – Every season

Monitoring of farms – At least once in a week

Children on Premises (2017)

Benchmarks:

CL.9: The employer shall ensure that children (including those residing on the farm and those of migrant workers) are not exposed to dangerous agriculture production activities, including exposure to chemicals/pesticides.

**Risk of
Noncompliance
in four farms**

Findings/Noncompliance Explanation:

Children's exposure to chemicals/pesticides is largely dependent on whether the child's mother or other family member is working on the farm or not. Workers who have to work whilst taking care of the children do not have any measure to prevent children's exposure to chemicals/ pesticides. Children freely run around on the farms. They and their parents are unaware of the hazards associated with chemicals and insecticide. Also, the equipment used in production activities are kept in the houses without any prevention.

Source: Observation, Interviews

Company Action Plan:

Syngenta will initiate the training program of safe chemical usage aspects which constitutes 5 golden rules, triple rinse, chemical storage, and chemical application techniques. The guidebook for the safe use of pesticides will be distributed to farmers and focus on chemical awareness and usage of PPE with the right material and the right method as per the WHO standard and lock and key for the place for pesticide collecting to prevent the hazard for a non-related person, especially the children. The translator will be invited to translate all the key messages to the workers.

Normally, the workers will have their own basic PPE to work at the farm. However, Syngenta will inform the seed organizers to focus on the usage of standard PPE and

	<p>create awareness regarding potential risks, particularly in relation to the chemicals used.</p> <p>Syngenta will initiate the project to encourage the farmer to support appropriate PPEs in order to support their workers. In addition, Syngenta field staff will distribute PPEs directly to daily workers when visiting the field and safety in the workplace will be communicated at the same time.</p>
Deadline Date:	Start training in Burmese from Dry season 2018 and cover 100% of workers by 2020.

2019 IEV Findings

On safe chemical use, Syngenta has made a notice of the size of 40 x 25 CM with signs connoting safety, no child labor, and a very small sign of FLA code of conduct in Thai and Burmese. According to Syngenta, the notice is installed in every farm with the farmer's name at the bottom. Of the 8 farms verified, there were at least two farms without this notice. Asking the farmers and workers, none of them could tell what are on the notice.

Syngenta local staff reported that there are bigger sizes of posters developed. These are posted in a few places frequently used as a venue for worker gathering. They mostly convey safety instructions through picture illustrations and messages. Syngenta staff used "google translation" to translate from Thai into Burmese. The verification team went to a village head house in Mon Hin Lek Fai and observed these posters. The Burmese-Thai translator found many translation mistakes that make the entire message confusing and misleading. The translator also asked two Burmese workers around there to read them as well. They also said they did not understand.

Through the verification during the harvesting activities, assessors found a lot of daily workers. Most of them are not informed about PPE and they brought their own PPE if any. Assessors found many of them do not use gloves or boots during harvesting. Their children were found sitting and playing around on the farms whilst their parent were working.

Overall Conclusion	<p>Some progress made but still need sustainable improvement</p> <p>There have been communication efforts to ensure safe handling of chemical and safety at work. However, impacts are still minimal and the quality of communication could be improved.</p>
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Follow-up Action Plan (to be filled by the company):	<p>Trainings and awareness sessions: Syngenta field production team will continue the effort of conducting more number trainings and awareness session to reach all the growers and workers in the production activity. Every grower shall be reached three times in a crop cycle during pre-planting, de-tasseling and harvesting and explain the FLA commitment, field safety and safe chemical management.</p> <p>We could reach around 200 growers in last completed season and it will be extended to larger number of growers in upcoming season. If any grower not able or missed to attend the sessions, they will be reached out during one-to-one session by field production team while they are in routine field visits.</p> <p>At least once in a crop cycle a formal trainings or awareness session and informal sessions during farm visits by the field production shall be organized for temporary and permanent workers. Exclusive session shall be arranged on field safety and safe chemical management to them.</p> <p>Syngenta field production team has field supervisors who knows Burmese language and selected them as master trainers to deliver the trainings to growers and workers</p> <p>Communication Tools: Syngenta has developed various communication tools such as posters, t-shirts (printed with FLA Codes), etc. In addition to this, field production team has power point presentations with animated video clips and pictographs. Also,</p>
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	<p>the team has planned to design flip charts, booklets / hand manuals with more pictorial messages. The posters shall be displayed in worker’s camp and working areas.</p> <p>These tools and medias shall be translated properly to all the languages the workers are comfortable to read and understand it. The professional translator will be consulted to translate all the tools into the workers language.</p> <p>Safety Kits -PPE: Syngenta always supplies minimum PPEs to all the farm workers within limit of available budget provisions, such as rubber and cloth hand gloves, surgical masks, Protective T-shirt (FLA branding), etc. In addition to this, growers shall be encouraged to provide further basic protective equipment to their workers. Syngenta field production team provide enough training to growers on safe use of PPE and it is the responsibility of grower to convey this message to next level.</p> <p>The field production team will monitor the farms regularly during their routine field visit and verify the knowledge level, usage of tools, PPEs usage etc., and it shall be recorded also.</p>
<p>Deadline Date (to be filled by the company)</p>	<ul style="list-style-type: none"> • Raising awareness or training to growers on 3 topics – 100% - Every year • Raising awareness or training to permanent workers – 100% - By 2021 • Raising awareness or training to temporary / migrant workers – 100% - By 2025 • Revise and usage communication tools & media – Mar 2021 • Safety Kit Distribution – Every season (based budget provision)

Progress Benchmarks Evaluation

<p>Right to Education (2017)</p>	
<p>Benchmarks: <i>CL.4.1: Resident and migrant children whose parents are involved in farm activities shall have guaranteed access to quality education. If there are no schools available in the area where children live or stay, the employer shall work with local authorities and/or other relevant stakeholders to facilitate access to education or provide alternative forms of schooling on the farm or in nearby communities.</i></p>	<p>In Progress</p>
<p>Progress Benchmarks Evaluation:</p>	<p>Syngenta initiated a pilot project in a key production area to provide scholarships for a group of migrant workers’ children to go to a nearby school which is a private school. However, that area is no more a production area of the company. It would be a good practice for Syngenta to continue the effort in its production locations as well.</p>
<p>Progress Benchmarks Action Plan:</p>	<p>Because of the planting area limitation, Syngenta need to move to another location for planting. Syngenta will try to continue the worker’s children project in the current planting area. Through this project, Syngenta would need to approach the local school or learning center because it’s a limitation of identifying children.</p>
<p>Possible Timeline:</p>	<p>Pilot in two villages and expected to start send the worker’s children to school or learning center in the beginning of the semester (May 2019)</p>
<p>2019 evaluation of the progress benchmarks implementation</p>	

Scholarship project was not implemented since the 2017 assessment. Syngenta local staff visited a local learning center for migrant children, but nothing concrete came out of the discussion.

Overall Conclusion	Still need sustainable improvement
Follow-up Action Plan (to be filled by the company):	<p>Syngenta will continue the Worker’s Children Imitative in upcoming season with the support of local schools. The team will approach local school and extend the support in identifying the children those are out of school. Special effort will be taken to admit to schools and also sponsoring the children education under CSR program.</p> <p>Before start of the season or crop activity, all the farms and workers shall be mapped to identify the children and prepare a list to trace the children. These lists can be shared with local schools to monitor it.</p>
Deadline Date (to be filled by the company)	<p>Mapping of children in the farms or workers camp – Dec 2020</p> <p>Sponsor the child education – March 2021</p>

Removal and Rehabilitation of Child Laborers (2017)

<p>Benchmarks:</p> <p><i>CL.10.2: If child labor is found to be a systemic issue in a particular supply chain, the participating company shall in consultation with upstream suppliers, employers and other stakeholders devise an action plan for its remediation, if possible, through an area- and community- based approach.</i></p>	In Progress
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Progress Benchmarks Evaluation:	There is a need to strengthen the implementation of remediation process of removal and rehabilitation of child labor, as stated in the company's manual.
Progress Benchmarks Action Plan:	<p>Syngenta has developed a child labor policy and procedure which is included in the production contract and emphasized to the farmer during pre-season meeting. Furthermore, Syngenta shall:</p> <ol style="list-style-type: none"> (1) arrange special training course for farmers, 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; <p>In case of rehabilitation program, Syngenta will coordinate with the local government to take care of education of the migrant workers’ children to study at school with support from the seed organizer. Syngenta has planned to advice farmers that Burmese migrant workers either leave their children with other family members in Myanmar, or if not possible, they must carry the necessary documents for their children to facilitate access to education at the Myanmar learning centers or Thai local school.</p>
Possible Timeline:	<p>Farmer awareness on COC and age proof documentation for every season – all farms (preseason meetings are compulsory)</p> <p>Worker’s awareness on COC and maintenance of age proof documents</p> <ul style="list-style-type: none"> • De-tasseling workers – By Dec 2018 • 50% of the workers – By Dec 2018 • All workers – By Dec 2020 <p>Internal monitoring - Thrice in each crop in 20% sample farms (Vegetative, pollination and harvesting period)</p>

2019 evaluation of the progress benchmarks implementation

Nothing has been done apart from emphasizing to the farmers at every production training not to use child labor.

Overall Conclusion	Still need sustainable improvement
<p>Follow-up Action Plan (to be filled by the company):</p>	<p>As mentioned in above CAP, Syngenta will continue the Worker’s Children Imitative in upcoming season with the support of local schools. The team will approach local school and extend the support in identifying the children those are out of school. Special effort will be taken to admit to schools and also sponsoring the children education under CSR program.</p> <p>Before start of the season or crop activity, all the farms and workers shall be mapped to identify the children and prepare a list of children. These lists can be shared with Myanmar learning centers or Thai local school to track and monitor them.</p> <p>During farmer’s training, they will be encouraged to take more precautions towards avoid children working in the farm and leaving them in workers camp. It is the responsibility of the farmers to promote education. They will be communicated collect age and identification proofs from all the workers including their children.</p>
<p>Deadline Date (to be filled by the company)</p>	<p>Mapping of children in the farms or workers camp – Every season</p> <p>Raise awareness among the growers and worker on collecting the age proofs – 3 Years</p> <p>Sponsor the child education – Based on the need</p>

Freedom of Association and Collective Bargaining

2017 Assessment Findings

Right to Freely Associate / Collective Bargaining (2017)

Benchmarks:

FOA.3: When the right to freedom of association and collective bargaining is restricted under law, employers shall facilitate and not obstruct legal alternative means of workers' association.

FOA.12.1: Employers shall recognize the rights of workers to free and voluntary collective bargaining with a view to the regulation of terms and conditions of employment by collective agreements.

FOA.12.2: Employers and worker representatives shall bargain in good faith, i.e. engage in genuine and constructive negotiations and make every effort to reach an agreement

**Risk of
Noncompliance
in one farm**

**Findings/Noncompliance
Explanation:**

There was an effort to negotiate for better wages among workers as reported in one farm a few years ago. This effort of informal collective bargaining led to the workers' demands being fulfilled. The daily wage was slightly increased from THB 120 to THB 150. However, the farmer removed some associated benefits, like two rest breaks during a working day. The tension led some workers to leave the job during that time. This incident has resulted in discouragement among other farm workers to collectively bargain.

There is no system, which would allow workers to collectively bargain or form formal means of engagement for unionization.

Source: Worker interviews

Company Action Plan:

Syngenta aims to improve the practice of this awareness by communicating the helpline number. Syngenta will also extend connection with the local CSOs support on remediation. The local NGOs, like LLC or the MAP Foundation, will focus on Myanmar workers by establishing a communication channel for the workers. The information shall be maintained in the IMS center. The local production team, seed organizers, and farmers will inform workers on the grievance procedure during on-the-spot worker group training sessions (10-20 workers) on COC in their Myanmar language. To make the program more efficient, the dedicated field staff will take over on the action implementation and follow up.

Deadline Date:

Starting from April 2018 and will cover 100% of workers by 2020

2019 IEV Findings

Nothing has been done to strengthen the grievance mechanism nor supporting collective bargaining. Collaboration with LLC has been short-term rather than a constant effort to extend Syngenta's connection to get CSO support on remediation.

Overall Conclusion

Still need sustainable improvement

New findings (If any):

mediate disputes between employers "Somchai Kham-Mok" And conflicting employees "Macho and Myoning" May 2020 (closed)

Follow-up Action Plan (to be filled by the company):

Syngenta planned to establish a complaint box to collect the grievances from the workers and this will be installed where it is easy to access by them, example in farms or worker's camp. FLA country manager only will be responsible to open the box and

	<p>collect the complaints, he will open it once in a week.</p> <p>In addition to this, the scope of existing hot line number facility will be expanded to multi-language cell to address all the complaints in workers language, e.g.: Thai, Burmese, etc.</p> <p>More clear communication will be disseminated to workers on this during farm level workers awareness. The details of grievance boxes shall be given in all the communication tools such as posters, digital media, etc.</p>
<p>Deadline Date (to be filled by the company)</p>	<p>Establishing complaint box in all the areas – Mar 2021</p> <p>Extended the scope of hotline number with multi-languages – Mar 2022</p> <p>Raise awareness among the workers on grievance channel – Mar 2022</p>

Health, Safety and Environment

2017 Assessment Findings

Chemical Management (2017)

Benchmarks:

HSE.9.2: All chemicals and hazardous substances shall be properly labeled and stored in secure and ventilated areas and disposed of in a safe and legal manner, in accordance with applicable laws. Where relevant, Material Safety Data Sheets (MSDS) must be available as well.

HSE.9.2.1: Labels shall be placed in the local language and the language spoken by workers, if different from the local language. Where workers are illiterate, the labels and instructions for their handling should be depicted by pictograms.

HSE.10: Workers shall receive training, appropriate to their job responsibilities, concerning the hazards, risks and the safe use of chemicals and other hazardous substances.

HSE.11.1: To prevent unsafe exposure to hazardous chemicals and hazardous substances, appropriate accommodations shall be made for pregnant women and workers under the age of 18, as required by applicable laws or the provisions of the FLA Workplace Code, in a manner that does not unreasonably disadvantage workers.

**Noncompliance
in all farms**

**Findings/Noncompliance
Explanation:**

There is no chemical management system in the farms. Chemicals are not kept in a separate area to prevent any exposure. They are not marked nor labeled for identification. There is no awareness of the hazards associated with the chemicals used or any instructions or guidelines provided about the level of hazards associated with each chemical used. Workers are verbally instructed on how to safely use chemicals, yet they did not receive proper training. Due to the absence of any training or guidelines, the farmers have not made any provisions for the safety of vulnerable workers like young workers and pregnant women.

Source: Worker interviews, Observation

Company Action Plan:

Syngenta will initiate the training for selected permanent migrant workers on safe chemical usage aspects, which constitutes 5 golden rules - triple rinse, chemical storage, and chemical application techniques. This training will be arranged twice per season: at the beginning of the season and during the season (around 40-50 days after planting) when pesticides are used in the field. The guidebook for the safe use of pesticides will be distributed to farmers and focus on chemical awareness and usage of PPE with the right material and the right method as per the WHO standard. A translator will be invited to translate all the key messages to the workers.

Deadline Date:

Start training in two languages - Thai and Myanmar – from the dry season 2018/19 (start from September 2018- March 2019). The pilot training will coverage 100% selected permanent workers 2019 and expand to cover all farms in 2020.

2019 IEV Findings

Permanent/ long-term/ regular workers have not been identified or recorded yet. Consequently, such training has not been done. However, Syngenta's actions so far including trainings and communication materials have been primarily around HSE although they were not organized in the manner elaborated in this action plan.

Overall Conclusion

Some progress made but still need sustainable improvement

Trainings have been done, but participants were a mix of regular and non-regular workers. Communication materials primarily convey messages on HSE, but the Burmese translation is dotted with mistakes.

<p>New findings:</p>	<p>In two farms, assessors found piles of rubbish lying next to natural water stream where the workers use for their baths. In one farm, there were containers of chemicals lying around the workers' shacks. In another farm, workers use the water to boil for consumption as well.</p>
<p>Follow-up Action Plan (to be filled by the company):</p>	<p>Syngenta field production team will conduct field safety and safe chemical management training or awareness sessions to the growers in every season. As mentioned above CAPs, 2nd and 3rd session with the growers and workers shall be covered these topics. Usually these two sessions will be done during de-tasseling and harvesting activity. All the permanent workers shall be covered during these sessions as well.</p> <p>Farm level awareness sessions shall be organized for temporary or migrant workers During the season. Syngenta field production team has field supervisors who knows Burmese language and selected them as master trainers to deliver the trainings to growers and workers</p> <p>Syngenta has developed various communication tools such as posters and other print medias. In addition to this, field production team has power point presentations with animated video clips and pictographs. Also, the team has planned to design flip charts, booklets / hand manuals with more pictorial messages.</p> <p>These tools and medias shall be translated properly to all the languages the workers are comfortable to read and understand it. The professional translator will be consulted to translate all the tools into the workers language.</p> <p>Farmers shall be encouraged to establish an agri-waste collection points in the farms or near of farmhouse, the wastes shall be disposed properly after completion of the season.</p> <p>The field production team will monitor the farms regularly during their routine field visit and verify the knowledge level, usage of tools, PPEs usage etc., and it shall be recorded also.</p>
<p>Deadline Date (to be filled by the company)</p>	<ul style="list-style-type: none"> • Raising awareness or training to growers on 3 topics – 100% - Every year • Raising awareness or training to permanent workers – 100% - By 2021 • Raising awareness or training to temporary / migrant workers – 100% - By 2025 • Revise and usage communication tools & media – 2020

Protection Reproductive Health (2017)

Benchmarks:

HSE.12.1: Employers shall ensure that women are not engaged in work that constitutes a substantial risk to their reproductive health.

Risk of Noncompliance in all farms

Findings/Noncompliance Explanation:

Although no pregnant female workers were seen employed on the farms, it was observed that the farm environment was overwhelmed with a chemical smell which could potentially affect a worker's health, including their reproductive health in the long term. There is no measure taken by the company to address this concern.

Source: Observation

Company Action Plan:

Syngenta will engage with expert consultants working on occupational health and safety to train the farmer and worker to improve knowledge and prevent themselves from the chemicals. The field supply & chemical storage locations must be responsible

	by the farmer and worker while Syngenta will provide training on hygiene, in addition to health and safety living conditions during this training. During the field visit, the field production staff will elaborate on the special treatment for pregnant workers to make sure that the farmer is aware of this topic.
Deadline Date:	Starting from dry season 2018/19 the training will be initiated with a selected group of farmers and workers in 2 villages and will cover 100% of villages by 2020.

2019 IEV Findings

According to interviews, no expert consultant has been engaged. Only Syngenta staff emphasized with the farmers about health and safety. There were on-the-spot training, but none of the workers interviewed could verify that there were the trainings as they have never participated one.

Overall Conclusion	Still need sustainable improvement
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Follow-up Action Plan (to be filled by the company):	<p>We agree with comments made by auditors, due to many local level issues could not arrange the occupational trainings to all the growers and workers. Though, Syngenta field production attempted to conduct the few sessions with support of local community health care center, but it is not sufficient to reach all and it has limitations also. On phase wise, decided to extend to OHS training to all the growers and workers. Local experts shall be engaged for this.</p> <p>Field safety and safe chemical trainings shall be conducted every season for growers and permanent workers. Farm level sessions will be organized on phase wise to reach the temporary workers. OHS related topics can be also covered under this session.</p>
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Deadline Date (to be filled by the company)	<p>Raise awareness on field safety & safe chemical management including OHS for grower and permanent worker - Every season</p> <p>Farm level session for temporary workers on phase wise – By March 2025</p> <p>Engage local expert on OHS – By health care center or NGO – reach all farms by March 2025</p>
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Access to Water and Sanitation (2017)

<p>Benchmarks:</p> <p>HSE.17.1: Safe and clean potable water for drinking shall be freely available at all times, within reasonable distance of the workplace. For farm settings in water-stressed regions where access to potable water is not always guaranteed, employers shall work with local authorities and other partners to provide clean water in sufficient volume and quality to guarantee the wellbeing of hired and family workers.</p>	Noncompliance in all farms
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Findings/Noncompliance Explanation:	<p>In some farms, drinking water provided was from underground. Although farmers were confident about its cleanliness, a worker was found to be having frequent diarrhea without realizing the cause. In more instances, the drinking water comes from wells adjacent to the farms which uses chemicals. In one of the farms, workers were seen using bottled drinking water but they had to buy the water from outside. It was not provided by the farmers.</p> <p><u>Source:</u> Observation, Interviews with farmers and workers</p>
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Company Action Plan:	<p>Syngenta will communicate with the farmer on the concern of safe and clean drinking water. Syngenta will initiate a project of safe drinking water and other health-related activity by collaborating with the external speakers from the local community health care center or local NGO. This awareness training will be arranged during the low activity season (0-40 days after planting). In addition, Syngenta will create an activity of the annual health check for farmers and workers by collaborating with the</p>
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	community health care center. Various communication tools such as posters and pamphlets etc. will also be used to emphasize good hygiene, health & safety for the farmers and workers. All of these tools will be converted into the workers' language.
Deadline Date:	The training on health and safety will be arranged after collaborating with local health community starting from dry season 2018/19
2019 IEV Findings	
Action plan was not implemented. Trainings and information materials emphasize safety in handling chemical use, rather than sanitation.	
Overall Conclusion	Still need sustainable improvement
Follow-up Action Plan (to be filled by the company):	<p>Syngenta field production team will continue the field safety and safe chemical management training or awareness sessions to the growers and permanent workers in every season. As mentioned above CAPs, 2nd and 3rd session with the growers and workers shall be covered these topics. Local experts shall be involved in phase wise to create awareness on health and sanitation.</p> <p>Farm level awareness sessions shall be organized for temporary or migrant workers during the season. Syngenta field production team has field supervisors who knows Burmese language and selected them as master trainers to deliver these trainings</p> <p>New communication tools shall be developed to sensitize the target group on health and sanitation in their comfortable language.</p> <p>The field production team will monitor the farms regularly during their routine field visit and verify the knowledge level and other HSE practices in the field.</p>
Deadline Date (to be filled by the company)	<p>Raise awareness on field safety including OHS for grower and permanent worker - Every season</p> <p>Farm level session for temporary workers on phase wise – By March 2025</p> <p>Engage local expert on OHS – By health care center or NGO – reach all farms by March 2025</p>
Medical Facilities (2017)	
<p>Benchmarks:</p> <p><i>HSE.16.2: Medical facilities shall be established and maintained as required by applicable laws. In case of no local law, the employer shall ensure that the workers are able to utilize local service providers in case of medical emergencies and have the local medical officer's contact address available to the workers. In the case of a medical emergency, e.g., injury or sudden illness, farmers will not unreasonably delay allowing a worker to have access to medical treatment.</i></p>	Risk of Noncompliance in two farms
Findings/Noncompliance Explanation:	<p>Workers are free to access local health facilities for minor ailments but if they need to go to a hospital in the town, they have to rely on their employers' availability as some of them do not have vehicles to go that far. Also, some of them have their documents, like identity proof etc., held by their employers; and traveling into the town without a legal document puts them at the risk of arrest.</p> <p><u>Source:</u> Interviews, Observation</p>
Company Action Plan:	Syngenta will improve farmer awareness. The speakers from LLC and their alliances will clarify this concern with the seed organizers, farmers and workers during the special training session during the season. Syngenta will invite the special speaker from the local health care center to provide the guideline of the migrant workers to

	access the local health care organization and the hospital. The number of support health care organizations such as emergency & deliver organization will be provided in those training and posted in the worker living area that is easy to access by the workers. The training session will be arranged for the pilot group of farmer and worker at least two times in dry season 2018/19.
Deadline Date:	Start training in dry season 2018/19 for the pilot farmers and workers in 2 villages and it will cover 100% of villages by 2020.

2019 IEV Findings

The trainings have been conducted. The participants were mainly workers rather than farmers. A health worker from a sub-district hospital was invited to discuss about local health care service and health and safety. More information about the trainings is in the Section “Recruitment and Hiring.”

Verification with workers who participated the trainings was not possible as assessors did not find a worker harvesting who has participated to one of those trainings.

Communication materials with emergency hotlines have been developed but only attached in a few places considered to be venues for workers gathering. Whilst these venues are village head’s where villagers would often visit, it is not clear whether these are places that the workers frequently visit or not. Translation is not accurate as Syngenta relied on “google translate” to translate into Burmese.

Overall Conclusion	There is progress but still need sustainable improvement The action plan has been followed although workers were targeted rather than farmers as stated in the action plan. Communication materials were not qualified in terms of translation quality.
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Follow-up Action Plan (to be filled by the company):	<p>Syngenta field production team will continue raising awareness among the grower and workers on HSE. More focus shall be given to increase the number of trainings and targeting all the growers and workers phase wise. The growers and permanent workers shall be covered on this subject during field safety training and temporary workers can be covered in phase wise during farm level sessions.</p> <p>A list of emergency services and its phone numbers will be prepared and displayed in key places where it can easily visible to workers, try to incorporate this in farmer manual also.</p> <p>As discussed in above CAPs, all the communication tools shall be translated into workers language with the support of language expert.</p>
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Deadline Date (to be filled by the company)	<p>Raise awareness on field safety including OHS for grower and permanent worker - Every season</p> <p>Farm level session for temporary workers on phase wise – By March 2025</p> <p>Translate communication tools in local language – By Dec 2020</p>
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Progress Benchmarks Evaluation

Safety Equipment and First Aid (2017)

Benchmarks:

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.

HSE.6.2: Sufficient number of workers shall be trained in first aid and fire safety.

Not Initiated

<i>HSE.16.3: An appropriate stock of medical first aid supplies shall be maintained at all times with valid expiration dates.</i>	
Progress Benchmarks Evaluation:	First aid kit was nowhere to be seen during farm interviews. Some workers mentioned going to a nearby health facility for first aid.
Progress Benchmarks Action Plan:	The first aid kit is initiated by Syngenta since 2016. Syngenta will continue this project and expand the coverage to the current planting area. The field production team will emphasize that the farmer should keep the kit available when the workers are working in the farm. They need to provide the supplement materials and maintain this kit for the permanent workers.
Possible Timeline:	Review the medicine and first aid materials on dry season 2018 and will distribute to the field during the planting season. Expected to cover 100% of the farmer and permanent worker who living nearby the farm within 2020.
2019 evaluation of the progress benchmarks implementation	
Syngenta continues to distribute first aid kits, 200 kits per province. Yet the verification team did not see any in none of the 10 visited farms.	
Overall Conclusion	There is progress made but still need sustainable improvement
Follow-up Action Plan (to be filled by the company):	<p>On pilot basis, Syngenta will procure and distribute the first aid kits, and to be placed at key places where group of farms or workers available, it must be accessible to them easily.</p> <p>It is the responsibility of the farmers to provide first aid kits to their workers. During field safety and OHS training, the farmers shall be motivated to buy and place it in their farms.</p> <p>Field production team will support the workers on how to use the materials available in the first aid boxes.</p>
Deadline Date (to be filled by the company)	<p>Raise awareness on field safety including OHS for grower and permanent worker - Every season</p> <p>Farm level session for temporary workers on phase wise – By March 2025</p> <p>Supply of First Aid Kits by Syngenta on pilot basis – Every season</p>
Personal Protective Equipment (2017)	
<i>Benchmarks:</i>	
<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>	
In Progress	
Progress Benchmarks Evaluation:	Long-termed workers tend to get the PPE for free either through the employer or through company staff. Daily wage workers however have to buy their own PPEs.
Progress Benchmarks Action Plan:	Syngenta started distributing the PPEs as a pilot project. The objective was to increase worker awareness on their health and safety. However, the real responsible person would be the farmer. Therefore, the special training event will be set on fair labor topics including labor right and regulations. The guidelines for the local farmers and workers to follow those law will be discussed with the invited speaker from LLC and labor protection department, Ministry of Labor. The IMS process will be used to check the farmer practice and improvement during the dry season 2018/19 and so on.
Possible Timeline:	Starting monitor PPEs provided by farmer in the pilot selected group of farmer and workers in dry season 2018/19 and so on.
2019 evaluation of the progress benchmarks implementation	

No specific training has been organized for farmers as planned in the 2017 action plan. Syngenta continues to distribute PPEs. Interviewed farmers received them and pass them to their regular workers. Daily workers are responsible for bringing their own PPE, not the farmers. [Some did not wear any PPE during harvesting.](#)

Overall Conclusion	PPE distribution continues but the overall issue still need sustainable improvement
Follow-up Action Plan (to be filled by the company):	<p>During field safety and safe chemical management training with the growers and permanent workers will be trained on usage of PPE by demonstration. In addition to this, field production team will train the temporary and permanent workers also during their field visit.</p> <p>Syngenta will encourage the growers to provide suitable PPEs to the workers and it is the responsibility of him.</p> <p>Field production team will monitor the workers during their field visit.</p>
Deadline Date (to be filled by the company)	<p>Raise awareness on field safety including OHS for grower and permanent worker - Every season</p> <p>Farm level session for temporary workers on phase wise – By March 2025</p> <p>Monitoring – Every season</p>

Hours of Work

2017 Assessment Findings

General Compliance (2017)

Benchmarks:

HOW.1.1: Employers shall comply with all national laws, regulations and procedures concerning hours of work, public holidays and leave.

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.

**Noncompliance
in all farms**

**Findings/Noncompliance
Explanation:**

Workers do not work longer than 12 hours a day, but in some weeks their working hours may exceed 60 hours as they do not necessarily have a weekly day off.

Source: Interviews with farmers and workers

Company Action Plan:

The special training event will be set for fair labor topics including labor rights, laws, hours of work, occupational health and safety etc. and provide guidelines including the question/answer session for the local farmers and workers. Syngenta will invite a special speaker from LLC and the labor department in order to train the farmers and workers. Syngenta will improve the system of the GDK that will be provided to all farmers before the season starts. Fair Labor manager and dedicated field staff will extend the training on the topic of how a documentation kit has to be maintained at the farm level. This documentation kit will contain workers' information such as name, age, wage, working hours etc. for internal audit by field production staff. In addition, Syngenta will communicate on the importance of record maintenance, in the regular farmer meeting.

Deadline Date:

Improve GDK system from wet season 2018 (April 2018) for pilot selected group of farmer and workers. The internal monitoring will cover 100% of the pilot group in dry season 2018/19 and will cover all farms by 2020.

2019 IEV Findings

As for farmers, Syngenta provides usual production trainings discussed in the finding for the "Employment and Relationship." Farmers are primarily informed about child labor and PPE and to some extent documentation of workers. Nothing more has been done in order to raise awareness of farmers about labor rights and hours of work issues specifically. There were training on workers' rights and workers' documentation, yet the target audience was workers, rather than farmers. None of the farmers interviewed knew about GDK distributed by Syngenta. Some of them use their own accounting notebooks which does not keep profiles of workers.

Overall Conclusion

Some actions have been done but still need sustainable improvement

Follow-up Action Plan (to be filled by the company):

Syngenta field production team will continue by having more number trainings and awareness session to reach all the growers and workers in the production activity. Every grower and permanent workers shall be reached three times in a crop cycle during pre-planting, de-tasseling and harvesting. During first session with them explain about the FLA commitment and its benchmarks, which will also include the topics on documentation.

The GDK or farm workers record template shall be revised and make it useful to record the workers details, attendance, working hours and wage payment. This will be made available to all the farmers before start of next season. It is the responsibility

	of the growers to maintain it properly with complete details of the workers.
Deadline Date (to be filled by the company)	<ul style="list-style-type: none"> • Raising awareness or training to growers and permanent workers – Every season • Raising awareness or training to temporary / migrant workers – 100% - By 2025 • Revise GDK /farm workers record template and distribute to all the farmers – from Dec 2020
Rest Day (2017)	
<p>Benchmarks:</p> <p><i>HOW.2: Pursuant to any permanent or temporary contract, workers shall be entitled to at least 24 consecutive hours of rest in every seven-day period. If workers must work on a rest day, an alternative consecutive 24 hour must be provided within that same seven-day period or immediately following. For short-term seasonal work during peak activities (2-3 weeks), workers have the option to work more than seven days without a day off if they voluntarily agree with it, unless local law prohibits it. When the peak activity period exceeds 3 weeks, and the employer has control over the workers' schedule, the rest day provision must apply.</i></p>	Noncompliance in all farms
Findings/Noncompliance Explanation:	<p>There are no fixed rest days on a weekly or monthly basis. Farmers claimed that workers can take leave at their own will. However, in reality, workers with monthly payments are treated like daily wage workers. Workers who take leave are not granted any pay for the said day.</p> <p><u>Source:</u> Interviews with farmers and workers</p>
Company Action Plan:	<p>The special training event will be set for fair labor topics including labor rights, laws, hours of work, occupational health and safety etc. and provide guidelines including the question/answer session for the local farmers and workers. Syngenta will invite a special speaker from LLC and the labor department in order to train the farmers and workers. Syngenta will improve the system of the GDK that will be provided to all farmers before the season starts. Fair Labor manager and dedicated field staff will extend the training on the topic of how a documentation kit has to be maintained at the farm level. This documentation kit will contain worker's information such as name, age, wage, working hours etc. for internal audit by field production staff. In addition, Syngenta will communicate on the importance of record maintenance in the regular farmer meetings.</p>
Deadline Date:	<p>Improve the GDK system from wet season 2018 (April 2018) for pilot selected group of farmer and workers. The internal monitoring will cover 100% of the pilot group in dry season 2018/19 and will cover all farms by 2020.</p>
2019 IEV Findings	
<p>As for farmers, Syngenta provides usual production trainings discussed in the finding for the "Employment and Relationship." Farmers are primarily informed about child labor and PPE and to some extent documentation of workers. Nothing more has been done in order to raise awareness of farmers about labor rights and hours of work issues specifically. There were training on workers' rights and workers' documentation, yet the target audience was workers, rather than farmers. None of the farmers interviewed knew about GDK distributed by Syngenta. Some of them use their own accounting notebooks which does not keep profiles of workers.</p>	
Overall Conclusion	Some actions have been done but still need sustainable improvement
Follow-up Action Plan (to be filled by the company):	<p>Syngenta field production conducts awareness session or training to the growers during pre-planting period of before start of the crop activity. All the growers will be raised awareness on FLA CoC, commitment and its benchmarks. During this session with the growers, explained about the GDK or farm workers record template and using it to record all the details of their workers. The workers are also informed to</p>

cross verify their details recorded in the template and it is the responsibility to provide the acknowledgement for the payment details.

Existing GDK or farm workers record template shall be revised and make it useful to record the workers details, attendance, working hours and wage payment. This will be made available to all the farmers before start of next season. It is the responsibility of the growers to maintain it properly with complete details of the workers.

- Deadline Date (to be filled by the company)**
- Raising awareness or training to growers and permanent workers – Every season
 - Raising awareness or training to temporary / migrant workers – 100% - By 2025
 - Revise GDK /farm workers record template and distribute to all the farmers – from Dec 2020

Public Holidays and Leave (2017)

Benchmarks:
HOW.9: Where permanent or long-term workforce is hired, employers shall provide workers with paid annual leave as required under national laws, regulations and procedures. For farms with informal labor structures hiring annual workers, arrangements can be made between producer and workers as long as it ensures a fair remuneration for the amount of work performed during the year.
HOW.14: Employers shall provide workers with sick leave as required under national laws, local provisions, regulations and procedures.

Noncompliance in all farms

Findings/Noncompliance Explanation:

Holidays and leaves are arranged informally. Farmers set terms and conditions of work, including holidays and leaves. Most workers can take a day off without getting paid or they have unpaid day-off when there is no work provided in the farm. Long-term workers who work at least for two crops equivalent to 10 months are not entitled to paid annual leaves but they are allowed to take long leave without pay.

Source: Interviews with workers and farmers.

Company Action Plan:

The law allows an annual leave for the worker but, in practice, it is agreed between farmer and worker. In general, the farmer allows the worker to have their selected holiday (for a longer duration) in the important festivals such as New Year, Songkran or other religious holidays etc. without payment. Syngenta shall create a plan to invite key speakers from both authorities and local CSOs to train the farmers on this issue. The special training will be arranged before the start of the season.

Deadline Date:

Starting from wet season 2018 (April 2018) and will cover 100% of farmers by 2020.

2019 IEV Findings

As for farmers, Syngenta provides usual production trainings discussed in the finding for the “Employment and Relationship.” Farmers are primarily informed about child labor and PPE and to some extent documentation of workers. Nothing more has been done in order to raise awareness of farmers about labor rights. There were training on workers’ rights and workers’ documentation, yet the target audience was workers, rather than farmers.

Based on interview with LLC, they have only trained some workers, not farmers.

Overall Conclusion

Some actions have been done but still need sustainable improvement

Follow-up Action Plan (to be filled by the company):

Agriculture is livelihood of small and marginal farmers, those who have small land holdings and practically it is not treated as industry unlike developed countries. Unpaid weekly off, rest days or holiday are the common issue agriculture sector. It is not affordable to farmers to fulfill this requirement. Still Syngenta field production

	<p>team will raise awareness on this to growers.</p> <p>Syngenta will bring this issue to multi stakeholders and CSOs to give attention find the proper solution or seek the suggestion improve the situation.</p> <p>Farmers will be trained on maintaining the GDK or farm workers record during preplant meeting with them and not for the workers. This will be utilized to record the rest days, weekly offs, holidays, etc.</p>
Deadline Date (to be filled by the company)	<ul style="list-style-type: none"> • Raising awareness or training to growers – Every season • Revise GDK /farm workers record template and distribute to all the farmers – from Dec 2020 • Consultation with CSOs and external stakeholders – Dec 2022

Progress Benchmarks Evaluation

Protected Workers (2017)	
<p><i>Benchmarks:</i> 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.</p>	Not Initiated
Progress Benchmarks Evaluation:	There is no system where farms would maintain separate written list of vulnerable workers like young workers, pregnant/nursing women workers.
Progress Benchmarks Action Plan:	Syngenta will start the program of data collection of migrant workers who have been living longtime with the farmer, in the beginning of WS18 start (March). The information will be analyzed to develop the program from current situation on the ID card of the seasonal workers. In dry season (starting from September) Syngenta will choose the selected group of farmers and the local Syngenta field staff who shall help create profile of each farmer (their family members, the farms under them, the number of workers recruited under them). The selected group of farmers and workers in the village will be selected for further activity. Dedicated Syngenta staff is also working with those international migrant workers, who do not have any ID. Syngenta will facilitate with the local authority to help the workers to create a valid ID so that it could be maintained with the farmer. The temporary workers would pose challenge and therefore the focus shall be given on the long term workers. The training on topic of Thai Labor Law and regulations will be arranged by Syngenta staff by collaboration with LLC and their alliances.
Possible Timeline:	<p>Training for farmer will refresh in April 2018 to all farmers and the initiate worker's training will be start in wet season planting (April – September).</p> <p>Initiate special training for worker's right, regulations and child labor in dry season 2018/19 (September 2018– March 2019).</p>

2019 evaluation of the progress benchmarks implementation

Nothing has been done yet.

Syngenta only has a plan to do profiling of long-termed/ regular workers in the next crop season, and to provide support for the farmers to register these workers legally or semi-legally. It is not clear how this support will be. The purpose of this profiling is to have a data of farmers with registered workers for Syngenta to choose from when screening farmers to work with the company.

There are no staff dedicated to do this work. All staff have to do production work whilst doing FLA-related work.

Overall Conclusion	Nothing has been done yet. Syngenta will start doing the profiling in April 2020
Follow-up Action Plan (to be filled by the company):	It is a big and challenging issue of migrant workers with no legal registered or identification. Syngenta alone cannot address this issue, it requires multi stakeholders support to ensure full compliance. Though Syngenta decided to have profiling of every farmers, those hired permanent and migrant workers, which helps the company to have business with farmers who have legal workers. Syngenta field production supervisors will do this profiling. It helps to decide by company and support can be extended to the workers to get registered legally. Seek the external support to address this and fulfill the requirements.
Deadline Date (to be filled by the company)	Profiling of workers : Before start of season Launch campaign to legal registration of workers – By Dec 2020 to Dec 2025

Overtime (2017)

Benchmarks:

HOW.6.3: Regular working hours and overtime is duly recorded in whatever means that are locally available and validated by the workers. For farms with informal labor structures, basic recording system shall be introduced to record workers' name, working days and payment and progressively work toward more detailed hours of work recording system.

Not Initiated

Progress Benchmarks Evaluation:	None of the farms maintained any written records which could determine the actual working hours, wages, age or further details of the employed workers.
Progress Benchmarks Action Plan:	Syngenta had developed the GDK since 2017 and continues to distribute the kit to all farms in the beginning of the planting season. However, Syngenta will extend the training on the topic on record maintenance and this documentation kit will contain worker's information such as name, age, wage, working hours etc. for internal audit by field production staff. Syngenta will insist the farmers to maintain the photocopies of the Thai government authorized age verification document in this documentation kit. The field production staff will be supported in reinforcing with the farmers and workers, during the field visit, to prohibit the child to enter the production field.
Possible Timeline:	Starting from Wet season 2018 (April, 2018) and will cover 100% of farmer in 2020

2019 evaluation of the progress benchmarks implementation

According to Syngenta staff, they still continue to distribute GDKs to farmers to document advances and pays. But no groups of farmers and workers have been selected to strengthen the system. In 2017, there was only one farm who used the distributed GDKs but turned out the records were fraud as they did not reflect their actual pay. In this verification, there is none of the farmers who are aware of, let alone receiving the GDK from Syngenta. One farmer initiated distribution of accounting notebook for all of her workers. All of them have to bring their personal notebook to receive their pay and sign it every time, and they keep the book to themselves. There are another two farmers who keep their accounting notebook to themselves and the workers have to sign in this book for every pay. For the rest of the farmers, there was no system of keeping this record. However, there was no complain from the interviewed workers about their pay apart from one worker whose husband, a regular worker, agreed with his employer to get collective pay all at once after the crop is sold. This means that he has not

received any pay since the start of the crop season.

<p>Overall Conclusion</p>	<p>Still need sustainable improvement</p> <p>Although Syngenta reported to continue distributing GDKs, none of the farmers interviewed knew about the GDK. Some of them use their own accounting notebooks which does not keep profiles of workers.</p>
<p>Follow-up Action Plan (to be filled by the company):</p>	<p>Existing GDK or farm workers record template shall be revised and make it useful to record the workers details, attendance, working hours and wage payment. This will be made available to all the farmers before start of next season. It is the responsibility of the growers to maintain it properly with complete details of the workers.</p> <p>New template requires, every worker has to provide acknowledgement after agreeing and put signature on proper column of respective workers. It ensures that the workers are communicated with their wage payment, attendance details and agreed for all the details mentioned on the document.</p>
<p>Deadline Date (to be filled by the company)</p>	<p>Revise the GDK or farm workers record template – By Dec 2020</p> <p>Maintaining the GDK by the farmers – Upcoming season onwards</p>

Compensation

2017 Assessment Findings

General Compliance / Wage Payment and Calculation (2017)

Benchmarks:

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.

C.2.2: Employers shall provide all legally required benefits to all workers.

C.6: All wages, including payment for overtime, shall be paid within legally defined time limits. Where no time limits are defined by law, compensation shall be paid at least once a month or upon completion of a seasonal task which takes less than a month.

When workers are hired through contractors, brokers or external agencies, employers shall make sure that workers are paid according to the benchmark requirements.

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.

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.

C.7.1: All payments to workers, including hourly wages, piecework, fringe benefits and other incentives shall be calculated, recorded, and paid in a manner that is convenient to workers (e.g., in cash, by bank transfer or check).

C.8.1: Employers shall compensate workers for all hours worked.

**Noncompliance
in all farms**

**Findings/Noncompliance
Explanation:**

There is no legal minimum wage enforced for the seasonal agricultural sector in Thailand. However, the law sets out paid sick leave, as well as holiday and overtime pay for workers. None of the farms provide these benefits. In one farm, paid sick leave was provided but only for the head worker.

There was no payment system wherein workers would be paid on a regular basis. One worker expressed the need to have monthly wage but the farmer would pay once every 10 months or pay petty advances for daily expenses and deduct it from the one-time payment. Thus, the system is not one of informed consent. The absence of records raises the risk of further exploitation.

Source: Interview with Labor Inspector, farmers, IMS staff and workers

Company Action Plan:

The compensation is agreed on negotiation between farmers and workers/groups of workers. Syngenta is committed to engaging farmer understanding of transparency and traceable wage payments by checking with the daily workers. Syngenta will distribute GDKs and inform the farmers to include the wages and hours of work for the further internal and external audit process. The requirement of providing leave and wage payments required by the law will be emphasized during the farmer meeting. IMS process to monitor the issue during the planting season at least two times per season.

Deadline Date:

In the first phase, the distributed GDK covers all 100% of selected farmers in the two demonstrated villages and we expected that 50% of this group of farmers can show the progress of the record. IMS monitoring the issue of leaves and wage payment will be implemented during dry season 2018/19 and so on.

2019 IEV Findings

According to Syngenta, they still continue to distribute GDKs for farmers to document advances and pays. But no groups of farmers and workers have been selected to strengthen the system. In 2017, there was only one farm who used the distributed GDKs but turned out the records were fraud as they did not reflect their actual pay. In this verification, there is none of the farmers who are aware of, let alone receiving the GDK from Syngenta. One farmer initiated distribution of accounting notebook for all of her workers. All of them have to bring their personal notebook to receive their pay and sign it every time, and they keep the book to themselves. There are another two farmers who keep their accounting notebook to themselves and the workers have to sign in this book for every pay. For the rest of the farmers, there was no system of keeping this record. However, there was no complain from the interviewed workers about their pay apart from one worker whose husband, a regular worker, agreed with his employer to get collective pay all at once after the crop is sold. This means that he has not received any pay since the start of the crop season.

Assessors went to the particular farm identified as troublesome in the 2017 findings about wage advances and worker involvement although there was no harvesting activity there. Assessors interviewed the workers met in 2017 and found that their wages of many months are withheld as the employer did not have the capacity to pay on time. They informed Syngenta who confirmed that this farmer is still contracted with Syngenta but they insisted that Syngenta has paid the farmer properly every crop. This is therefore a problem between the farmer and the workers.

Overall Conclusion	Still need sustainable improvement Although Syngenta claimed to continue distributing GDKs, none of the farmers interviewed knew about the GDK. Some of them use their own accounting notebooks which does not keep profiles of workers.
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New findings:	Assessors went to the particular farm identified as troublesome in the 2017 findings about wage advances and worker involvement although there was no harvesting activity there. Assessors interviewed the workers met in 2017 and found that their wages of many months are withheld as the employer did not have the capacity to pay on time.
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Follow-up Action Plan (to be filled by the company):	As mentioned above CAP, existing GDK or farm workers record template shall be revised and make it useful to record the workers details, attendance, working hours and wage payment. This will be made available to all the farmers before start of next season. It is the responsibility of the growers to maintain it properly with complete details of the workers. New template requires, every worker must acknowledge and put signature on proper column of respective workers. It ensures that the workers are communicated with their wage payment, attendance details and agreed for all the details mentioned on the document. Related new finding, Syngenta field production team did an investigation and had multiple dialogue both the parties – growers and workers. After successful intervention, grower could able to reimburse balance wages to the workers. The issue has been resolved already.
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Deadline Date (to be filled by the company)	Revise the GDK or farm workers record template – By Dec 2020 Maintaining the GDK by the farmers – Upcoming season onwards
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Fringe Benefits (2017)

Benchmarks: C.12.3: Employers must provide goods and services at fair and reasonable prices, comparable to local market prices. C.12.5: Employers must be able to demonstrate the accuracy or reasonableness of these charges.	Noncompliance in two farms
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Findings/Noncompliance Explanation	There are instances where the farmers arbitrarily determined certain utility fees without workers' knowledge and accurate record keeping. For example, one farmer
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	<p>would charge the worker THB 100 a month for a rice cooker and THB 300 for three appliances. Another farmer bought a motorbike on behalf of a worker but registered the bike in his own name. The farmer contributed THB 10,000 while the worker paid three times more. The employer's help in buying a motorbike for the worker's use is at risk of worker vulnerability as the employer has legal ownership of the motorbike although he paid much less than the worker.</p> <p><u>Source:</u> Interview with the workers</p>
Company Action Plans:	<p>Syngenta will collaborate with local organizations such as LLC, as well as the department of labor protection and welfare to emphasize on the terms, conditions, and penalty mentioned under Thai labor law to the farmers and permanent workers. Syngenta expects that the practical guidelines from these local organizations will help to improve this issue. Syngenta will further inform the farmers that the arbitrary charge should be fair and keep a record for internal audit processes. Dedicated field production staff will make an internal audit during the planting season at least two times per season.</p>
Deadline Date:	<p>Training on law and condition for farmer and worker in two pilot villages start in dry season 2018/19 and will cover 100% of farms by 2020</p>
2019 IEV Findings	
<p>Apart from Syngenta's usual trainings for farmers for every crop cycle, nothing more has been done. In every crop cycle, Syngenta provides three trainings for farmers to discuss about production aspects. Syngenta local staff reported that they devote time at the end of every training to emphasize about FLA code of conduct. However, from the interviews, farmers are only aware of child labor and HSE.</p> <p>Based on interview with LLC, they have only trained workers, not farmers.</p>	
Overall Conclusion	Still need sustainable improvement
Follow-up Action Plan (to be filled by the company):	<p>Syngenta discontinued its operation above explained area and no further action can be done on this. Even though, keeping this incidence in mind Syngenta field production team sensitize the growers and workers during awareness session or trainings. The growers shall be encouraged to maintain the ethical financial practices with his workers.</p> <p>Syngenta expects external experts' guidelines to address these kinds of issues.</p>
Deadline Date (to be filled by the company)	<ul style="list-style-type: none"> • Raising awareness or training to growers – Every season • Experts consultations – Need based