



[2015]

FAIR LABOR ASSOCIATION INDEPENDENT EXTERNAL MONITORING AGRICULTURAL REPORT

COMPANY: Olam
COUNTRY: Ivory Coast
PROVINCE: Indenié Djuablin
COMMUNITIES: Padiegnan, Brindoukro, Appouesso
MONITORS: Societal Compliance Initiative
AUDIT DATE: 16-22 December 2015
PRODUCTS: Cocoa
NUMBER OF GROWERS/WORKERS: 60/93
NUMBER OF GROWERS/WORKERS INTERVIEWED: 60/39
NUMBER OF FARMS VISITED: 60
TOTAL AREA COVERED IN AUDIT: 310 HA
PROCESSES: harvesting and weeding



FLA Member/Affiliate Update

of ended its membership as an FLA Participating Company in January 2026. The company's reports can still be found at Fairlabor.org

To view more about the FLA's work with Olam, please visit the FLA website [here](#).

Non-compliances Overview and Table of Content

1. Code Awareness		Page
GEN 1	Establish and articulate clear, written workplace standards. Formally convey those standards to Company Growers as well as to supply chain Organizers.	
GEN 2	Ensure that all Company growers as well as supply chain Organizers inform their workers about the workplace standards orally and through the posting of standards in a prominent place (in the local languages spoken by workers) and undertake other efforts to educate workers about the standards on a regular basis.	
GEN 3	Develop a secure communications channel, in a manner appropriate to the culture and situation, to enable Company employees, Supervisors and employees of supply chain organizers to report to the Company on noncompliance with the workplace standards, with security that they shall not be punished or prejudiced for doing so.	
	Other (Company Internal Grievance Policy and Procedures)	
2. Forced Labor		
F.1	General Compliance Forced Labor	
F.2	Freedom in Employment	
F.3	Employment Terms/Voluntary Agreement	
F.4	Employment Terms/Prohibitions	
F.5	Debt/Bonded Labor	
F.6	Wage Advances	
F.7	Free Disposal of Wages/Cash and In-Kind Compensation	
F.8	Recruitment through Referrals	
F.9	Freedom of Movement	
F.10	Grower-Controlled Living Quarters	
F.11	Worker Ability to Terminate-Freedom of Movement	
F.12	Individual Contracts (Verbal / Written)	
F.13	Personal Worker Identification and Other Documents	
F.14	Bonded Labor	
	Others	

3. Child Labor			
CL.1	General Compliance Child Labor	Noncompliance	<u>6</u>
CL.2	Child Labor		
CL.3	Proof of Age Documentation		
CL.4	Other Means of Age Verification		
CL.5	Government Permits and Parental Consent Documentation		
CL.6	Employment of Young Workers		
CL.7	Hazardous Work for Young Workers		
CL.8	Education of Young Workers		
CL.9	Children on Premises		
CL.10	Removal and Rehabilitation of Child Laborers		
	Others		
4. Harassment or Abuse			
H&A.1	General Compliance Harassment and Abuse		
H&A.2	Discipline/Fair and Non-discriminatory Application		
H&A.3	Discipline/Worker Awareness		
H&A.4	Discipline/Training		
H&A.5	Discipline/Monetary Fines and Penalties		
H&A.6	Discipline/Access to Facilities		
H&A.7	Discipline/Physical Abuse		
H&A.8	Discipline/ Verbal Abuse		
H&A.9	Violence/Harassment/Abuse		
H&A.10	Sexual Harassment		
H&A.11	Punishment of Abusive Workers/Others		
H&A.12	Grievance Procedure		
	Others		

5. Non-Discrimination			
D.1	General Compliance Non-Discrimination		
D.2	Employment Decisions		
D.3	Sex-Based Wage Discrimination		
D.4	Marital Status or Pregnancy		
D.5	Protection and Accommodation of Pregnant Workers and New Mothers		
D.6	Health Status		
D.7	Discriminatory Violence/Harassment/Abuse		
	Others		
6. Health and Safety			
H&S.1	General Compliance Health and Safety		
H&S.2	Document Maintenance/Worker Accessibility and Awareness	Noncompliance	<u>7</u>
H&S.3	Written Health and Safety Policy		
H&S.4	Health and Safety Management System		
H&S.5	Communication to Workers		
H&S.6	Access to Safety Equipment and First Aid	Noncompliance	<u>8</u>
H&S.7	Personal Protective Equipment	Noncompliance	<u>9</u>
H&S.8	Chemical Management and Training	Noncompliance	<u>10</u>
H&S.9	Chemical Management for Pregnant Women, Young Workers and Family Members residing in the farm		
H&S.10	Protection Reproductive Health		
H&S.11	Machinery Maintenance and Worker Training	Noncompliance	<u>11</u>
H&S.12	Medical Facilities		
H&S.13	Drinking Water	Noncompliance	<u>12</u>
H&S.14	Rest Areas		
H&S.15	Living Quarters		
	Others		

7. Freedom of Association and Collective Bargaining			
FOA.1	General Compliance Freedom of Association		
FOA.2	Right to Freely Associate		
FOA.3	Grower Interference and Control		
FOA.4	Anti-Union Violence/Harassment/Abuse		
FOA.5	Right to Collective Bargaining/Unorganized Workers		
	Others		
8. Hours of Work			
HOW.1	General Compliance Hours of Work		
HOW.2	Rest Day		
HOW.3	Meal and Rest Breaks		
HOW.4	Overtime		
HOW.5	Over Time/Positive Incentives		
HOW.6	Public Holidays		
	Others		
9. Wages, Benefits and Overtime Compensation			
WBOT.1	General Compliance Wages, Benefits and Overtime Compensation		
WBOT.2	Minimum Wage		
WBOT.3	Timely Payment of Wages		
WBOT.4	In-kind Compensation		
WBOT.5	Advance Payments		
WBOT.6	Worker Wage Awareness		
WBOT.7	Record Maintenance	Noncompliance	13
WBOT.8	Employer Provided Services		
WBOT.9	Additional Benefits		
	Others		

Child Labor: General Compliance Child Labor

CL.1 Growers shall comply with all local laws, regulations, and procedures concerning the prohibition of child labor.

Noncompliance

Explanation: During the visit in the community of Padiengan, monitors observed two children, 10 and 12 years old, who participated in cocoa pod opening using machetes. These children do not go to school and do not have birth certificates. They are neither family members of the producer nor employees. They came to the farm with other community members to help the producer in the scope of the community helping scheme (producers and family members from the same community helping each other during peak activity times). Even if those children are not directly related to the interviewed producer, he uses their services. The monitors therefore concluded that this violates the requirements of Olam and the FLA COC and secondly, that the producer is responsible for this violation resulting from the involvement of children in dangerous activities like pod opening.

Source: Observations; Interviews with producers and with concerned children

Plan Of Action: To ensure good management of the child labor issue, Olam has installed a Child Labor Monitoring and Remediation Committee (CLMRC) at all the suppliers in its supply chain. To improve performance of these committees, Olam has trained the staff to understand the child labor laws and data collection methodology. The CLMRC staff follow up and send the data to Olam who then processes the collected data. Olam also provides support and facilitates solutions for the cases of child labor identified by the CLMRC.

The CLMRC of the cooperative was trained on April 14 and 15, 2016 on the issues of child labor and hazardous tasks. Their role is to raise awareness among producers and workers of the cooperative not to involve children under 18 in any dangerous work. The CLMRC will conduct unannounced farm inspection visits in order to identify children younger than 18 carrying out harmful and illegal farming activities. The CLMRC will also help to profile all the children in the producers and workers household and identify school age children. The profile will identify those children who effectively attend school, the type of the farming activities the children are involved in, and what rehabilitation actions could be planned for them.

The CLMRC will intensify training and awareness of child labor in all the sections of the cooperative through farmer field schools (June – December 2016). The training will also call farmers' attention to all the community service providers involved in their farms to ensure they are over 18 years old. Farmers should always verify the age of community laborers.

Deadline Date: December 2016

Health and Safety: Document Maintenance/Worker Accessibility and Awareness

H&S.2 All documents required to be available to workers and growers by applicable laws (such as health and safety policies, MSDS, etc.) shall be made available in the prescribed manner and in the local language or language(s) spoken by the workers if different from the local language. If the workers are illiterate, the company shall make an effort to provide pictorials that the workers can easily understand.

Noncompliance

Explanation: Olam has published an illustrated Code of Conduct (COC) containing pictures and provisions on Health and Safety. This COC also exists in poster and leaflet format and is meant to strengthen producers' and workers' access to information on the matter. However, throughout their visits, monitors did not see any posters displayed in the visited communities. Twenty-four percent of the producers interviewed reported that they never received the Olam COC. Moreover, the cooperative has a list of banned and approved chemicals to be used for cocoa production. The list is displayed at the headquarters of the cooperative but is not available to producers and workers in the communities.

Source: Observations; Interviews with producers and IMS staff

Plan Of Action: Olam will proceed to a large distribution of leaflets containing its revised COC and make sure that both farmers and workers have received a copy in order to actively promote, all the provisions regarding health and safety, pesticides, environment and the other workplace standards. The COC posters will be displayed in all the sections and subsections of each supplier (May – December 2016).

Through all sections of the farmer field schools, the supplier cooperative internal monitoring system will also communicate to producers and workers all the policies implemented at the cooperative level regarding health, safety and environment, the emergency evacuation procedure, the communication channel and the grievance procedure, as well as the lists of approved and prohibited chemicals by the Conseil du Café Cacao. These lists will be also posted at the cooperative level and in the sub-sections (May – August 2016).

Deadline Date: December 2016

Health and Safety: Access to Safety Equipment and First Aid

H&S.6 Company should ensure that growers and workers have access to safety equipment and first aid.

Noncompliance

Explanation: In Brindoukro, despite the lack of health center in the community, no first aid kit is available to help producers or workers manage emergencies before transferring injured people to the nearest health center located 4km away.

Source: Observations; Interviews with producers and IMS staff

Plan Of Action: Ref: H&S.2
After the IEM, the supplier provided the Brindoukro section with a first aid kit. The farmer leader (delegate) of the section was trained to be the first aid manager in the community and this was communicated to all the producers of the section through the farmer field school (January 2016). All the other sections of the cooperative were also provided with first aid kits ensuring necessary care in emergency cases. Based on the issues identified through the IEM, Olam will improve the training given to all the cooperatives of the supply chain to ensure all the respective sections are equipped with first aid kits and can provide emergency care.

Deadline Date: January 2016

Health and Safety: Personal Protective Equipment

H&S.7 All necessary personal protective equipment (PPE), such as gloves, eye protection, respiratory protection, etc., should be made available to relevant workers to prevent unsafe exposure (such as inhalation or contact with solvent vapors, dust, etc.) to health and safety hazards.

Noncompliance

Explanation: Regarding personal protective equipment (PPE): for applicators who are assigned by the cooperative to chemical application of the producers' farms, the risks are properly identified and they wear the appropriate PPE. For male producers, the main PPE they use are boots and trousers to protect them from snakebites, thorns, and wounds. In that regard, monitors consider that all the risks they face are not taken into account in their protection efforts. Even if monitors recognize the complexity of the situation in the Ivorian context due to the weight of tradition and the households' standard of living, they nevertheless noticed that producers and workers do not protect their eyes at the time of picking cocoa pods although they could get debris in their eyes. Female producers or members of producers' family, by tradition, usually wear sandals when going to farms. Finally, in the cocoa beans collection stores, staff rarely protect their nose and mouth when handling beans, despite the significant amount of dust that the beans create. These risks are not adequately taken into account in the companies' effort to raise awareness of producers and workers on health and safety risks.

Source: Observations; Interviews with IMS staff, producers, workers and women

Plan Of Action: With the support of Olam, the supplier will train producers and workers on the use of protective glasses against dust and debris when harvesting cocoa pods through the farmer field schools (May – December 2016).

The supplier with the support of Olam will also intensify awareness training through the farmer field schools regarding the wearing of boots for Female producers and other members of the producers' family (May – December 2016).

At the supplier's cocoa beans store, the supplier will make the wearing of face masks compulsory. The cooperative will also provide the masks to all bag handling staff (May – December 2016).

Olam will proceed to a large distribution of leaflets containing its revised COC to both farmers and workers to demonstrate how one must protect his or herself when working on the farm (May – December 2016).

Olam through their regional representatives will intensify awareness training on the appropriate security measures to be adopted at work in all the cooperatives of the supply chain (December 2016).

Deadline Date: December 2016

Health and Safety: Chemical Management and Training

H&S.8 All chemicals and hazardous substances, farm produce, and raw materials should be properly labeled and stored. The grower shall not use any banned (either by national or international laws) pesticides fertilizers, or any other agro chemicals in the farm. The grower shall ensure safe disposal of waste chemicals or empty containers of chemicals or packing materials. The grower/organizer/company will provide the necessary training to the worker with regard to handling of agro chemicals (pesticides, fertilizers, and other hazardous substances), their application and the use of personal protective equipment.

Noncompliance

Explanation: In its Code of Conduct, Olam has developed various health and safety provisions and made an effort to popularize good practices. The cooperative, in addition to training and awareness raising sessions provided on the issue, has also trained and equipped ten (10) applicators responsible for chemical application in the producers' farms. A storage room has also been built for the storage of chemical products. Despite these efforts, during their visits to the community of Padiegnan, monitors observed empty chemical containers in the living and working area of two producers.

Source: Observations; Interviews with producers and IMS staff

Plan Of Action: The supplier's internal monitoring system will organize awareness training until December 2016 through all the farmer field schools, on the correct and safe management and storage of working tools as well as empty chemical containers, sprayers and phytosanitary products both on and off the farm. The supplier will ensure that the awareness training involves all producers and workers; those attending the farmer field school and those not currently participating. Through the training, producers and workers will be informed of the adverse effects of chemicals on human health, the need to always wear effective protective clothing, and to ensure secure storage facilities (April – December 2016).

Deadline Date: December 2016

Health and Safety: Machinery Maintenance and Worker Training

H&S.11 All production machinery, equipment, and tools shall be regularly maintained and properly guarded. Workers shall receive training in the proper use and safe operation of machinery, equipment, and tools they use.

Noncompliance

Explanation: During their visits to the community of Brindoukro, monitors observed the presence of two chemical sprayers disposed within the reach of children in the houses of two producers.

Source: Observations

Plan Of Action: Ref: H&S. 8

Deadline Date: December 2016

Health and Safety: Drinking Water

H&S.13 Company should make efforts to create awareness among growers and workers about clean drinking water. Growers shall not place any undue restrictions on drinking water in terms of time and frequency.

Noncompliance

Explanation: The community of Appoisso (with about 10,000 inhabitants) has no access to drinking water. Producers, workers and community members fetch water from wells. They are neither trained nor informed of water treatment techniques before consumption in order to minimize sanitary risk.

Source: Observations; Interviews with producers and workers

Plan Of Action: SODECI, the national water distribution company, has made an analysis of the water source from the section of Appoisso. Meanwhile, the action undertaken includes: training Appoisso community members on the water treatment methods recommended by the water analyzer agent, and their application. The training is provided by the group administrator who was trained on the water treatment methods by the SODECI agent. This year, in several areas Olam Cocoa has started the covering and the treatment of wells frequently used in villages with a budget of USD5,000.

The supplier has included access to drinking water at Appoisso in this season's social program which is funded by 30% of the net cooperative premium.

Deadline Date: December 2016

Wages, Benefits and Overtime Compensation: Record Maintenance

WBOT.7 Company shall make efforts to educate and assist the growers in maintaining records of wages provided to the worker in cash or in-kind or both, and such records shall be acknowledge by the worker.

Noncompliance

Explanation: Even if the producers recognize having received their certification premium, there is no formal evidence attesting the payment because the cooperative does not deliver receipt for payment to producers. Furthermore, payments made by the producers to the workers are not documented either.

Source: Observations; Interviews with producers, workers and IMS staff

Plan Of Action: Since last year, Olam and the suppliers have been training farmers on the importance of recording payroll of their workers.

In order to provide proof regarding the certification premium payment, Olam has requested that suppliers provide the signed lists of all farmers who have received the premium at the cooperative level. Olam will verify the information on these lists at farmers' level.

The supplier will assist farmers in purchasing payment registers and correctly recording the monthly payments of all workers' salaries (December 2016).

Deadline Date: December 2016