



[2015]

FAIR LABOR ASSOCIATION
INDEPENDENT EXTERNAL MONITORING
AGRICULTURAL REPORT

COMPANY: Olam

COUNTRY: Ivory Coast

PROVINCE: Guémon

COMMUNITIES: Kéitadougou, Bleufor, Kranzadougou (or
KRINJADOUGOU, official title)

MONITOR: Societal Compliance Initiative

AUDIT DATE: 09-15 October 2015

PRODUCTS: Cocoa

NUMBER OF GROWERS/WORKERS: 60/122

NUMBER OF GROWERS/WORKERS INTERVIEWED: 60/37

NUMBER OF FARMS VISITED: 60

TOTAL AREA COVERED IN AUDIT: 222 HA

PROCESSES: Harvesting

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.	Noncompliance	<u>6</u>
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.	Noncompliance	<u>7</u>
	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>8</u>
CL.2	Child Labor		
CL.3	Proof of Age Documentation	Noncompliance	<u>10</u>
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	Noncompliance	<u>11</u>
CL.8	Education of Young Workers		
CL.9	Children on Premises	Noncompliance	<u>12</u>
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	Noncompliance	<u>13</u>
	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	14
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	15
H&S.7	Personal Protective Equipment	Noncompliance	16
H&S.8	Chemical Management and Training	Noncompliance	17
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		
H&S.12	Medical Facilities		
H&S.13	Drinking Water	Noncompliance	18
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	<u>19</u>
WBOT.8	Employer Provided Services		
WBOT.9	Additional Benefits		
	Others		

Code Awareness:

GEN 2 Ensure that all Company growers as well as Seed 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.

Noncompliance

Explanation: Olam has developed a Code of Conduct (COC), which contains labor standards provisions. The poster and leaflet formats of this COC contain pictures to facilitate access to information for illiterate people. In general, these standards are communicated to producers and their workers during Farmer Field School sessions and through distribution of the leaflets and posters in the communities. However, monitors observed that only the Kranzadougou community (of the three visited communities) has a functional Farmer Field School. In the two other communities, producers and workers do not receive training or information on labor standards. The leaflets are not distributed in any of the three visited communities and no poster was observed by the monitors except for the one posted at the cooperative headquarter in Duékoué.

Source: Interviews with producers, workers and IMS staff; Record review; Observation

Plan Of Action: After the FLA's IEM, the supplier has increased the number of its Farmer Field Schools from four to 22 to enable all farmers and workers to benefit from the training. Both the communities of Bleufort and Kéitadougou now have a functional Farmer Field School. Training in the new schools started in March and each school has two training sessions a month.

Olam will proceed with a large distribution of leaflets containing the revised COC and make sure that all the farmers and workers receive a copy in order to actively promote the provisions regarding health and safety, pesticides, environment and the other workplace standards. The COC posters will be displayed in all the section and sub-sections of every supplier (May – December 2016). Each supplier with the support of the Olam's regional representative will invite the farmers in each section to a meeting where the COC will be distributed and explained. The signed lists of the farmers who receive the COC will be communicated to Olam. Farmers will confirm receipt of two leaflets and sign a commitment to give the second copy to a worker.

Deadline Date: December 2016

Code Awareness:

GEN 3 Develop a secure communications channel, in a manner appropriate to the culture and situation, to enable Company employees, supervisors and employees of seed 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.

Noncompliance

Explanation: According to the Internal Monitoring System (IMS) staff, Olam has appointed a responsible person based in Duékoué to whom producers can directly report any case of abuse and non-compliance without fear of retaliation. However, according to the monitors' assessment, the grievance procedure is not communicated to producers (farmers) and workers of the visited communities. Producers and workers interviewed were not informed of the possibility to report non-compliance to the responsible person. Moreover, they have no means to do so since they do not have the phone number of this person.

Source: Interviews with producers, workers and IMS staff; Record review

Plan Of Action: With the support of Olam, the supplier will duplicate training that will cover the other policies implemented at the cooperative level namely the communication channel and grievance procedure. (March – December 2016).

In order to support the suppliers' grievance policies, Olam has highlighted on the revised leaflet and posters a grievance contact number which anyone can call to easily and safely express their grievance and report non-compliance. Olam's regional representative in Duekoué and the supplier will also ensure their contact number is displayed at the cooperative level and also communicated to all the farmers and workers through the farmer field schools (March – December 2016). Olam has developed a non-retaliation policy to encourage farmers and workers on the use of the grievance channel which is also communicated on the COC leaflet.

As per GEN 2; Each supplier with the support of the Olam's regional representative will invite the farmers in each section to a meeting where the COC will be distributed and explained. The signed lists of the farmers who receive the COC will be communicated to Olam. Farmers will confirm receipt of two leaflets and sign a commitment to give the second copy to their worker. A program for farmer field schools designed for the workers will be agreed by the cooperative management and farmers and communicated to all the workers.

Deadline Date: December 2016

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 farm visits, monitors have observed many cases of children not being enrolled in school or who have dropped out of school. For example in Kéitadougou, two children aged 12 and 14 years who do not attend school were identified. At Bleufor, a 9-year-old child was removed from school by his father and an 11-year-old left school at the beginning of primary school. At Kranzadougou, a 15-year-old teenager has never been to school and another 15 year old was removed from school by his father. According to interviews conducted, these children are actively involved in production activities on their parent's farms including those belonging to Olam cocoa supply chain. According to the new country regulations, parents have an obligation to educate their children until the age of 16 years and no child shall be employed before the age of 16 years or become an apprentice before the age of 14.

Source: Observations during visits to farms and in the camps; Interviews with producers and workers

Plan Of Action: After the FLA's visit, the producers and their children were visited by Olam, Nestlé and the International Cocoa Initiative (ICI) in order to get more information regarding the situation of the identified children and their parents for the appropriate corrective action plan:

- At Kranzadougou: the 15-year-old child, withdrawn from school and identified by the FLA monitors, has returned to school with the support of the local school management committee. The supplier (the cooperative) has paid the child registration fee and the final exam fee. Olam provided the school kit and the child was able to resume classes on Monday, November 16, 2015. The two children, aged 9 and 11 from Bleufor who were removed from school, have also returned to school and are being supported by ICI as part of Nestlé's Child Labor Monitoring and Remediation System (CLMRS).
- The supplier, with the support of Olam and ICI, will follow up on the children's school attendance. For the 15-year-old child from Kranzadougou and the two others, aged 12 and 14 from Kéitadougou, ICI will look into providing literacy classes since they are older. In Côte d'Ivoire, the minimum age to attend primary school is 6 years old and the primary school lasts 6 years. So at 12 years old, these two children should be ending primary school or starting junior secondary school. Regarding their ages: these two children will feel shy to go to school. With the literacy classes, these children will learn writing and reading and then start with vocational courses
- All the cases of the children identified without birth certificates have been taken on by ICI to establish their birth certificates.
- To prevent similar situations, the supplier has organized three sensitization campaigns on child labor and children rights: December 10, 2015, January 2016, and February 16, 2016. These sensitization campaigns will help to inform all the producers and their workers. The Child Labor Monitoring and Remediation system (CLMRS) of the ICI will intensify their efforts for all of Olam's cooperatives involved in the Nestlé/ICI SS RTE project like the assessed cooperative. Olam has also established and trained a Child Labor Monitoring and Remediation Committee (CLMRC) for all the other cooperatives in its supply chain which are not part of the SS RTE project (October – April 2016). The Nestlé/ICI SS RTE project is a child labor monitoring

system which focuses on farmer profiling, education, and the development of farmers' communities. The Olam CLMRC is composed of community operation agents (AOC). Each AOC supervises 40 farmers. The role of the CLMRC is to raise awareness among producers and workers of the cooperative on the non-use of children under 18 in all work that could be dangerous. The CLMRC will conduct unannounced inspection of the farms in order to identify children under 18 years involved in farming activities. This CLMRC will also help to profile all the children in the producer's and worker's household. This profiling is to identify school age children, those who effectively attend school, the type of the farming activities children are involved in, and what rehabilitation action could be planned.

- The assessed cooperative along with all the others in the supply chain, with the support of Olam, keep a focus on the CLMRC activities of profiling, household and farm visits in order to ascertain the number of school age children and their school attendance. The CLMRC activities will help to control the type of the activities conducted by children under 18 years old.
- The sensitization training on child labor and worst forms of child labor monitored by the cooperative's Group Administrator will be provided again to all farmer field schools of the supplier and throughout Olam's supplier network. A special emphasis will be placed on ensuring workers have valid identity papers and birth certificates and that the correct assignment of tasks is likewise contracted.

**Deadline
Date:**

December 2016

Child Labor: Proof of Age Documentation

CL.3 Company will assist the grower in maintaining proof of age documentation for all young workers in the farm and it is recommended to maintain proof of age documentation for all workers in the farm, including long term and casual workers.

Noncompliance

Explanation: A mechanism is implemented in the cooperative within the scope of the Child Labor Monitoring and Remediation System (CLMRS) to assist producers in establishing identification documents for their children, regardless of whether or not they participate in production activities. However, monitors observed about twenty cases of children who do not have identification documents. If in one case the producer recognized that it was recorded by the system in place, nothing is done for the others. Producers do not follow the practice of checking the age of young workers they hire in order to assign the right tasks to them (e.g. non hazardous tasks before the age of 18) and the duration of their working time.

Source: Interviews with children, producers and IMS staff; Record review

**Plan Of
Action:**

Ref: CL.1

The sensitization training on child labor and worst forms of child labor will be provided again in all the farmer field schools of the supplier by the Group Administrator and throughout Olam's supplier network by Olam. A special emphasis will be placed on the study of the root causes of this issue including a consultation with local stakeholders involved in delivering identification documents and on ensuring that all workers have valid identity papers, their children obtain birth certificates, and that the correct assignment of tasks is subsequently contracted.

**Deadline
Date:**

December 2016

Child Labor: Hazardous Work for Young Workers

CL.7 No person under the age of 18 shall undertake hazardous work, i.e., work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of persons under the age of 18. Young workers between the ages of 15 to 18 years will not be involved in strenuous and hazardous work. Such work includes the application of agro chemicals, pesticides, and fertilizers, use of farm equipment tools and machinery, lifting or moving of heavy materials or goods, or carrying out hazardous tasks such as underground or underwater or at dangerous heights, or any other activity which may cause harm or would affect the well being of the young worker.

Noncompliance

Explanation: In the visited communities, especially in Bleufor and Kranzadougou, monitors observed five young workers who were actively involved in production activities in their parents' farms. Though those occupations are within the boundaries of local laws, they are not within the codes set by either Olam or the FLA. Those young workers are involved in various production activities which are potentially hazardous including weeding, harvesting and transporting heavy loads. At the time of the visit in Bleufor, one young worker was observed carrying a heavy load of fresh cocoa beans after pod opening. Three others in Kranzadougou were involved in weeding using machetes. They did not have any identification documents that could serve as proof of age verification for the monitors.

Source: Interviews with young workers and producers; Observations

Plan Of Action: Ref: CL.1 &3.
The sensitization will also focus on types of hazardous tasks for young workers. Through this, farmers and workers will be sensitized to the type and the category of tasks in order to prevent young workers from performing hazardous works.

Deadline Date: December 2016

Child Labor: Children on Premises

CL.9 The grower will ensure that children (all children, including those residing in the farm) will not have access to areas such as machines / electric operation, application of pesticide and fertilizers, storage areas, and others where there are activities that can cause harm to the child.

Noncompliance

Explanation: During visits in the communities of Kéitadougou and Kranzadougou, monitors observed two children of about 6 years old in the camps located within the cocoa farms. These children were handling machetes, in the presence of their parents, that were not adequately stored. These tools constitute a hazard for them.

Source: Observations

Plan Of Action:

The supplier's internal monitoring system will provide awareness training again on safe management & storage of working tools, empty chemical containers, sprayers, and the farm treatment process through the farmer field schools (March – December 2016).

With the support of Olam, the supplier will ensure that the awareness training involves all the producers and workers: those attending the farmer field schools as well as those not currently participating through household visits. Through the awareness training, producers and workers will be informed on the adverse effects of chemicals on human health and the importance of wearing effective protective equipment

In order to better protect children from child labor, the CLMRC at each cooperative level will ensure regular farm visits to discourage farmers from involving children in work.

Ref: CL.1

Deadline Date:

December 2016

Harassment or Abuse: Grievance Procedure

H&A.12 Company shall have in place grievance procedures that allow first an attempt to settle grievances directly between the worker and the grower but, where this is inappropriate or has failed, it is possible for the worker to have the grievance considered at one or more steps, depending on the nature of the grievance and the structure and size of the enterprise. Company shall ensure that workers know the grievance procedures and applicable rules.

Noncompliance

Explanation: The cooperative has got an internal grievance procedure to allow producers and workers to report their complaints or grievances. However, this procedure is unknown to them in the three visited communities.

Source: Record review; Interviews with producers, workers and IMS staff

Plan Of Action: The supplier's internal monitoring system will communicate to producers and workers all the policies implemented at the cooperative level regarding health, safety and environment, the communication channel, and the grievance procedure.

In order to support the suppliers' grievance policies, Olam has highlighted on the revised leaflet and posters a grievance contact number which anyone can call to more easily and safely express their grievance and report non-compliance (May – December 2016). Olam has developed a non-retaliation policy to encourage farmers and workers on the use of the grievance channel which is also publicized on the COC leaflet. All the calls will be recorded. Issues will be categorized and analyzed to provide the most appropriate solutions.

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: During their visits, monitors did not see any posters displayed in the communities. All producers interviewed reported they had never received any COCs from Olam or Nestlé. Moreover, the cooperative has a list of banned and approved chemicals to be used for cocoa production. Even when this list is displayed at the cooperative headquarter, it is not available to producers and workers in the communities, while they buy chemicals directly on the local market.

Source: Interviews with producers, workers and IMS staff; Observation; Record Review

Plan Of Action: The supplier's internal monitoring system will also communicate to producers and workers all the policies implemented at the cooperative level regarding health, safety and environment, the communication channel, and the grievance procedure (May – December 2016).

The lists of approved and banned pesticides by the Conseil du Café Cacao will be shown to all the workers and producers and posted at the cooperative level and in the sections and sub-sections (until December 2016).

Olam will proceed with a large distribution of leaflets containing the revised COC and make sure that all farmers and workers receive a copy in order to actively promote all the provisions regarding health and safety, pesticides, environment and the other workplace standards. The COC poster will be displayed in all the sections and sub-sections of each supplier (May – December 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: Olam, in partnership with the cooperative, has equipped the cooperative's sections with first aid kits and has developed a health and safety management policy for its members. First aid officers have been identified, trained, and equipped to implement this policy. However, according to the monitors' assessment in Bleufor and Kéitadougou, producers and workers do not know this policy nor are the kits available. A first aid kit is available in Kranzadougou where the person responsible for first aid lives. Kranzadougou is located seven and 11 km away from the two communities and it is also where the nearest health center is. Therefore, it is difficult for producers and workers in Bleufor and Kéitadougou to benefit from these kits which are supposed to aid in emergencies until they can reach a health center.

Source: Interviews with IMS staff, producers and workers

Plan Of Action: With the support of Olam, the supplier will provide Bleufor and Kéitadougou with first aid kits by December 2016. A farmer leader in both communities will be selected and trained to be in charge of the first aid. This provision will be communicated to the two communities' members through farmer field schools as soon as possible. Based on the issues identified through the IEM, Olam will improve the training given to cooperatives and request that each cooperative supplier adopts similar measures in appointing first aid managers and equipping each section with first aid kits.

Deadline Date: December 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: Producers in Kéitadougou and Bleufor communities reported to monitors that due to the insufficient number of trained chemical applicators in their section, they conduct chemical application in their farms by themselves. However, they do not have equipment to protect themselves properly and they are not trained on health and safety measures to conduct this activity. Furthermore, producers and their workers as well as staff in the bean buying stores are not always properly equipped to minimize health and safety risks. For example, in the farms, producers and male workers wear boots to protect their feet. But women rarely do so and wear sandals. Also when picking the pods, producers and workers do not protect their eyes while they are exposed to all kinds of risks. Staff responsible for handling the beans in buying stores do not protect their nose and mouth despite the significant amount of dust created by beans.

Source: Interviews with producers and workers; Observations

Plan Of Action:

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

The supplier will also intensify awareness training through farmer field schools regarding the importance of wearing of boots for female farmers and their family members.

At the cocoa purchasing store, the supplier will make the wearing of face masks compulsory and will provide face masks to all the bag handling staff (March – December 2016).

Olam will proceed with a large distribution of leaflets containing the revised COC which also demonstrates how one must protect his or herself when working on the farm (March – December 2016).

For the communities of Kéitadougou and Bleufor, the supplier has decided to train and equip two crop sprayers by December 2016 which will reduce the health risks for producers treating their farms themselves. At Kéitadougou and Bleufor farmer field schools, the supplier will intensify the awareness training on the dangers related to handling pesticides and publicize the lists of approved and prohibited chemicals by the Conseil du Café Cacao by December 2016.

Through the regional representatives, Olam will intensify awareness training on safety at work in all the cooperatives and check that each cooperative has sufficient protective equipment for their farmers. Olam is actively working with two input providers who also provide protective equipment (December 2017).

Deadline Date:

December 2017

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: Monitors observed empty chemical containers on the ground of the farms of four producers in Kéitadougou, two in Bleufor, and two in Kranzadougou. Another producer in Kéitadougou stored a chemical sprayer in his kitchen, accessible to anyone. Producers and workers, particularly those of Kéitadougou and Bleufor, are not trained on the safe management and disposal of chemicals.

Source: Observations; Interviews with producers and workers

Plan Of Action: Through the farmer field schools, the supplier's internal monitoring system will communicate to producers and workers all the policies implemented at the cooperative level regarding health, safety and environment, as well as the management of empty chemical containers, the sprayers, and the farm treatment process (March – December 2016).

The lists of approved and banned pesticides by the Conseil du Café Cacao will be shown to all the workers and producers and posted at the cooperative level and in the sections and sub-sections (until December 2016).

The revised Olam supplier COC to be distributed shortly reiterates the need for protective equipment and the safe management and disposal of chemical containers.

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 Kéitadougou has no access to drinking water. Producers and workers of these communities use wells and backwaters to fetch water. Water collected from these sources is not always potable and they are neither trained nor informed on water treatment methods prior to consumption.

Source: Observations; Interviews with producers and workers

Plan Of Action: Olam has advised the supplier to address Kéitadougou's need for potable drinking water in this season's social project, which is funded by 30% of the net cooperative premium, to either build some new and protected wells in the community or rehabilitate the existing well followed by a water treatment program.

The supplier will contact a water treatment agent from SODECI, the national water distribution company, for training on water well treatment techniques. This training will be given again to all the producers and workers of Kéitadougou (December 2016). This year Olam Cocoa, as an example of good practice and partnership, has started the covering and the treatment of frequently used wells in a number of supplier cooperatives' communities.

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 acknowledged by the worker.

Noncompliance

Explanation: During their visit in the communities, monitors observed that the purchase of producers' beans is well documented by the cooperative. However, payment of workers' wages in the farms is not documented by the producers, while the cooperative has representatives (Delegates, Producers Relays, etc.) that cover each of the communities who could assist producers and workers in documenting or establishing a control mechanism (e.g. with witnesses) for payments to workers.

Source: Interviews with producers, workers, IMS staff; Records review

Plan Of Action: Since last year Olam and the supplier have trained farmers on the importance of recording payroll for their workers. The cooperative will assist farmers in purchasing payment registers, and also assist them in recording the monthly payments of all workers' salaries (December 16).

Deadline Date: December 2016