



# FAIR LABOR ASSOCIATION<sup>®</sup>

VERIFICATION / SOCIAL IMPACT EVALUATION IN  
HAZELNUT PRODUCTION

EVALUATION RESULTS for BALSU SOCIAL PROGRAM

*October 2018*

# Table of Content

## OBJECTIVES & METHODOLOGY

## FINDINGS

*General Akçakoca Context*

*General Profile of Workers in 2018*

*Intervention Evaluation – Safe Space*

*Intervention Evaluation – Labor  
Contractor Training*

*Intervention Evaluation – Strong Women  
Strong Agriculture Project*

*Intervention Evaluation – Renovations*

## CONCLUSION & RECOMMENDATIONS

**ANNEX - Evaluation of Main IEM Assessment Areas  
in 2018**



A world map in a light gray color is centered on the page. The map shows the outlines of continents and is overlaid with a grid of latitude and longitude lines. At the top of the page, there is a solid red horizontal bar. The text 'OBJECTIVES & METHODOLOGY' is centered over the map in a bold, dark blue font.

# **OBJECTIVES & METHODOLOGY**

## Objective of the Social Impact Evaluation (SIE)/Verification Study



- The Fair Labor Association (FLA) verifies the internal monitoring programs of Nestlé, Olam, and Balsu's hazelnut production.
- From 2015 to 2018, the three companies participated in the USDOL project that led to an in-depth assessment of the companies' internal management programs and workplace conditions. Conducting yet another round of IEMs in 2018 hence would have had limited value addition.
- In 2018, FLA and the three affiliated companies decided to pilot an enhanced data collection method that focuses on impact (Social Impact Evaluation - SIE) and moves beyond legal compliance-based audits.
- **The pilot was designed to delve deeper into the assessment of the interventions and determine if the actions that Nestlé, Olam, and Balsu have undertaken in their supply chain has led to an improvement in conditions for workers.**

## The SIE/Verification Study – Key Steps & Timeline

1

June –  
July 2018

**Intervention Mapping:** *The company team was asked to fill out an Excel table capturing information on the date, location, budget, activity description and expected output, outcome and impact and related indicators (in other words, key results chain) for all key project areas.*

2

July 2018

**Meetings with the Company Team:** *The FLA team convened with the Balsu team several times to agree on the interventions to be evaluated, refine key results chain tables and determine main evaluation questions.*

3

July 2018

**Development of Methodology & Sampling:** *The FLA presented the proposed methodology to collect data needed for the study. Ideas were exchanged with the Balsu team on sampling, fieldwork dates, and locations.*

4

July –  
August 2018

**Development of Target Group-Based Tools:** *Tailor-made data collection tools were developed based on the agreed methodology.*

5

6th–10th of  
August 2018

**Fieldwork/Data Collection:** *Fieldwork took place during the harvesting season, around the estimated peak activity dates. The research team visited evaluation locations (Beyören and Balatlı villages), interviewed target group members, and visited hazelnut gardens.*

6

September –  
October 2018

**Analysis & Report:** *Both statistical and qualitative analysis was conducted based on the collected data and a report was prepared.*

## Methodology & Sample – *In Detail*

A set of different qualitative and quantitative research methods were used within the scope of this study

### Qualitative Methods

Desk review (*2013-2017 IEM Reports, data shared by GHV & Balsu*)

In-Depth Interviews (*with farmers, labor contractors, safe space teachers and staff, company staff, traders/'manavs,' village headmen and local authorities*)

Focus group meetings (*total of 3 groups with workers & 3 groups with safe space students*)

### Quantitative Methods - Randomized Controlled Experiments

Questionnaire – Survey (*administered to 90 workers at the intervention points*)

Observation at the safe space/summer school in Beyören  
(*2 x half day sessions*)

## Methodology & Sample – Garden Visits / Quantitative Data Collection

*Whenever circumstances allowed, the evaluation team targeted for interviews workers who were beneficiaries of more than one intervention. The purpose was to reach interviewees who would be able to provide insight on more than one evaluation area and the interconnectedness of the selected interventions.*

# of Garden Visits	Villages	Interviewed Target Groups	Number of Female Workers Whose Data Collected	Number of Male Workers Whose Data Collected	Total Number of Interviewed Workers
7	Beyören & Balatlı	Workers, supervisors, and garden owners interviewed during each garden visit.	45	45	90

- A total of 90 workers were interviewed during working hours for garden visit interviews.
- Accommodation areas provided by the garden owners were visited after work hours to conduct focus group interviews with the workers. Since some workers were interviewed at the gardens (90 workers) and afterward at their houses, a total of 110 workers were reached within the framework of this study. (See details within qualitative interviews)
- The garden owners were mostly interviewed during the garden visits, while labor contractors were interviewed individually at their proposed meeting points. The other interviews were held in the offices of the respective parties.

## Methodology & Sample – *Qualitative Interviews*

IDI/FGD #	Profile	Beneficiary Status
1 IDI	Deputy Governor of Düzce	-
1 IDI	Akçakoca Provincial National Education Governor	-
1 IDI	Akçakoca Employment Agency (İŞKUR) Representative	-
1 IDI	District Director of Youth and Sport Representative	-
1 IDI	District Director of Health Representative	-
2 IDIs	Village headmen (Beyören & Balatlı villages)	-
1 FGDs	Balsu Corporate Social Responsibility staff	-
1 FGDs	Genç Hayat Foundation (GHF) Safe Space Staff (including GHF Child labor Prevention Program Manager)	-
2 IDIs	Safe Space Teacher	-
2 IDIs	Female garden owners	Participant of ' <b>Strong Woman, Strong Agriculture</b> ' Project
2 IDIs	Male farmers (one of them is a Trader/Manav)	Owners of <b>Renovated Houses</b>
2 IDIs	Labor contractor	Participated in GHF Mardin <b>Labor Contractor Workshop</b>

- A total of 15 people were interviewed through in-depth interviews (IDI); 9 participants were key informants and 6 of them were project beneficiaries. A total of 8 individuals from Balsu and its implementing partner GHF participated in Focus Group Discussions (FGD).



## Methodology & Sample – *Qualitative Interviews*

FGD #	Profile	Beneficiary Status	Number of Interviewed Females	Number of Interviewed Males	Total Number of Interviewed Workers
3 FGDs	1 Workers FGD – Family Group	Children attend <b>Safe Space</b> They received <b>Balsu’s Training</b> Family stays at <b>Renovated House</b> Their <b>labor contractor</b> received training in 2018	6	3	29
	1 Workers FGD – Young Workers Group	They received <b>Balsu’s Training</b> Group stays at a <b>renovated house</b> Their <b>labor contractor</b> received training in 2018	3	8	
	1 Workers FGD - Young Workers Group	They received <b>Balsu’s Training</b> Group stays at a <b>renovated house</b> Their <b>labor contractor</b> received training in 2018	7	2	

FGD #	Profile	Beneficiary Status	Number of Interviewed Females	Number of Interviewed Males	Total Number of Interviewed Children
3 FGDs	1 FGD with Safe Space Students aged 10-12 (at school)	Children attend a <b>safe space</b>	1	3	12
	1 FGD with Safe Space Students aged 13-15 (at school)	Children attend a <b>safe space</b>	2	3	
	1 FGD with Safe Space Students aged 8-15 (at their home)	Their <b>labor contractor</b> received training in 2018 Family stays at a <b>renovated house</b>	2	1	

## Methodology – *Limitations & Challenges*



- **Short Time Frame of Interventions:** Most of the interventions took place within the last year of the project, which is too short of a time period to create substantial social change. Evaluation results should be considered keeping this point in mind since targets currently seem 'unachieved' in these areas. The safe space/summer school is the sole intervention area which has been active for a longer period of time (more than 3 years) and accordingly, it is in 'targets achieved' status.
- **Absence of a Control Group:** The original methodology required identifying a counterfactual location in the region (one or two villages where no social program was active) with the help of the company so that a control group would be formed. During the fieldwork visit to the proposed counterfactual point, it was seen that local workers were employed in the area. Thus, the evaluation team was unable to collect substantial data in the region to make a comparison with the intervention points.
- **Data Not Accessible or Poor Quality:** The evaluation team originally planned to use data collected by the company, its implementing partner and local authorities in the region in the last 5 years to capture the change via quantitative data and to present a comprehensive picture. Even though most of the actors operating in the field were open and cooperative, it was seen that they have different data collection priorities and varying capacities limiting the depth and quality of the analysis. It should be also noted that some local authority actors were openly unwilling to cooperate in this matter.

## Methodology – *Limitations & Challenges*

- **High Targets:** The expected outputs, outcomes and impacts of the company interventions and their indicators were jointly identified in a short period of time before the data collection phase by Balsu and the FLA teams. The evaluation findings proved that some of the impact targets set (especially regarding working rights issues) heavily depend on local and central authorities decisions and actions. The company has very limited room for creating change in these areas.
- **Tension in the Local Communities & Access to Target Groups:** Recent fieldwork experiences demonstrated that fluctuations in the hazelnut prices have increased tensions in the field. Members of the local community tended to distrust, even act hostile towards ‘outsiders’ who inquired about the subjects of child labor and working conditions. Therefore, the company had to act as a gatekeeper during the fieldwork to guarantee access to all target groups, referring potential and willing interviewees to the FLA team.
- **Cooperation & Transparency Issues:** It was observed that some of the interviewees were distrustful of the evaluation’s intentions and as a result, only cooperative and transparent to a certain degree. It is the team’s observation that despite efforts to explain the aim of the study and give data confidentiality guarantee, the tendency was ‘to act safe’ and not to share information that would ‘spoil their own interest’ or the interest of a business associate. Also, assessment fatigue is an important factor that fueled their non-cooperation tendency. There is a race against time once the harvest starts in the region yet multiple groups (client groups, auditors, researchers) pay visits to the gardens in these villages and make inquiries during this short time period, unintentionally slowing down the work. It is observed that this high traffic unsettles garden owners and workers.
- **Fieldwork & Harvest Timing:** Even though the scheduled fieldwork dates were expected to be harvest peak days, a limited number of gardens were active during the fieldwork time. The FLA team had to rely on Balsu to pinpoint active gardens and to conduct visits in these limited number of gardens. The team originally aimed to conduct a minimum of 7 garden visits, but one of the associate evaluators had to return to the villages in the week of 13<sup>th</sup> of August to conduct 2 garden visits to reach this minimum number.

A world map in light gray tones is centered on the page. A solid dark red horizontal bar is positioned at the top. The text is overlaid on the map.

## **EVALUATION of FINDINGS**

*General Akçakoca Context*

## Akçakoca has a key place in hazelnut production in Turkey

### POPULATION

	Female Population	Male Population	Total Population
City	122.067	122.001	244.068
Village	66.688	66.854	133.542
<b>TOTAL</b>	<b>188.755</b>	<b>188.855</b>	<b>377.610</b>

According to the 2017 census of Düzce province, 64.64 % of the population resides in the city center and 35.36% live in the villages.

### HAZELNUT PRODUCTION

Hazelnut is the most prominent agricultural product in the province, districts, and villages. An agricultural area of 153.000 decare is being used for hazelnut production in the region and yearly production varies between 17.000 to 36.000 tons.

Hazelnut production started 50 years ago in Akçakoca district and, according to Fiskobirlik data, from 1983 to 2015 hazelnut production areas increased by 124%.

	Area (%)	Turkey Rank	Production (%)	Turkey Rank	Agricultural Yield (kg/da)
<b>TURKEY</b>	100		100		96
<b>Düzce</b>	8,9	6	11	5	118
<b>Akçakoca</b>	3,1	6	4	5	118

## A considerable part of its population grows hazelnut

2017			
District	Number of Businesses	Support Area (da)	Support Amount (TL)
Merkez	3.923	54.396,066	9.247.331,22
Akçakoca	7.622	146.403,974	24.888.675,58
Cumayeri	2.377	43.441,743	7.385.096,31
Çilimli	841	11.985,252	2.037.492,84
Gölyaka	1.577	24.085,043	4.094.457,31
Gümüşova	1.520	22.818,988	3.879.227,96
Kaynaşlı	1.357	16.057,648	2.729.800,16
Yığılca	5.443	83.329,516	14.166.017,72
<b>TOTAL</b>	<b>24.660</b>	<b>402.518,230</b>	<b>68.438.099,10</b>

### FARMERS IN AKÇAKOCA & AREA-BASED SUPPORT RECEIVED

There are 7.702 farmers in Akçakoca registered in the Farmer Registration System and these farmers cultivate a total of 150.924 decare of land.

7622 farmers were provided area-based support in 2017 and the total amount of support was 24.888.675 TL

Sources:

<http://koop.gtb.gov.tr/data/5ad06bb9ddee7dd8b423eb23/2017%20F%C4%B1nd%C4%B1k%20Raporu.pdf>

[https://duzce.tarimorman.gov.tr/Belgeler/PLANVERAPOR/duzce\\_faaliyet\\_raporu-2017.pdf](https://duzce.tarimorman.gov.tr/Belgeler/PLANVERAPOR/duzce_faaliyet_raporu-2017.pdf)

## The region hosts a large group of seasonal agricultural workers each year for the hazelnut harvest

### NUMBER OF WORKERS & CHILDREN WHO TRAVELED TO REGION IN 2017

Female	Male	Below 16 Years Old	16 Years Old and Above
2.581	2.145	1.154	3.572
<b>TOTAL: 4.726</b>		<b>TOTAL: 4.726</b>	

According to 2017 records of the Düzce Gendarmerie, 4726 individuals traveled to Akçakoca for the hazelnut harvest. 24% were children.

Balatlı and Beyören hosted a total of 387 individuals in 2017 of which 122 were children. This means that 31,5% were children.

### NUMBER OF WORKERS & CHILDREN WHO TRAVELLED TO REGION IN 2018

Female	Male	Below 16 Years Old	16 Years Old and Above
1.985	2.175	765	3.395
<b>TOTAL: 4.160</b>		<b>TOTAL: 4.160</b>	

According to '2018 Report on Social Support Action Plan for Seasonal Agricultural Workers', 4.160 individuals traveled to Akçakoca for the hazelnut harvest. 18% were children.

Balatlı and Beyören hosted a total of 471 individuals in 2018 of which 101 were children. This means that 21% were children.

## Hazelnut production is a sensitive and top priority issue for the local authorities

The FLA team interviewed representatives of local authorities in Akçakoca to have a better understanding about the general context in which Balsu social program is being shaped. All interviewed representatives emphasized that they are aware of the importance of hazelnut production for the region, therefore they are very invested in all efforts that would support it in any way.

*The local authorities claimed to be sensitive and motivated about the social compliance issues in hazelnut production but they add that they are limited by certain challenges.*

Local governors have changed frequently in recent years, often replaced by alternate directors. In other words, the local authorities have been operating in a state of transition for a long time challenging both the accumulation of know-how and institutions' capacity for action in the field.

Local authorities may remain passive in certain subjects because of grey areas of responsibility. Taking initiative is not popular while the public sector is going through a harsh transition period.

They may have limited resources to take action even if their role and responsibility is clear and requires them to act. Receiving METIP support is not an option either since there is limited public land in the villages of the Western Black Sea Region and METIP investments only take place in public lands. METIP is the government's scheme to improve seasonal migrant workers living conditions.

Fluctuations in hazelnut price are perceived to be a factor that partly hinders their efforts. They believe that it is very challenging for all the actors in the field to work against the backdrop of tensions associated with price fluctuations.



# Balsu is perceived to be a mobilizing force that contributes to change by the local authorities

Although it should be accentuated that their views are mostly based on perception rather than hard data, representatives of local authorities appreciate Balsu's efforts in the field, claiming that Balsu's Program contributes to improvement in certain key areas and accelerated the pace of change. The fruits of the program are especially visible in Balatlı and Beyören villages in which the efforts concentrate.

## 3 Main Areas of Change that Balsu's Social Program Particularly Contributes to

### **Increasing Awareness of Child Labor**

*This has been a priority area for the local authorities in recent years (2018 was declared 'the year of the battle against child labor' by Turkey) and they believe that they are doing their best with their limited resources. Balsu has contributed especially through its support to safe spaces in the region. The safe space has become a model in the region.*

### **Facilitating Workers' Access to Public Services**

*Balsu's team collaborates closely with the local authorities and acts as their eyes in the fields, partly compensating for their limited resources in a sense. They establish the link between the workers and public authorities through their active field presence.*

### **Securing Farmer Support in Social Compliance Issues**

*It is believed that Balsu's Farmer Programs (Good Agriculture Program) serve as an incentive for the farmers' compliance in social issues. Their support to farmers is vital especially considering the possible negative effects of fluctuating hazelnut price over the compliance issues.*

A world map in light gray with a grid of latitude and longitude lines. A solid red horizontal bar is at the top of the page. The text is centered over the map.

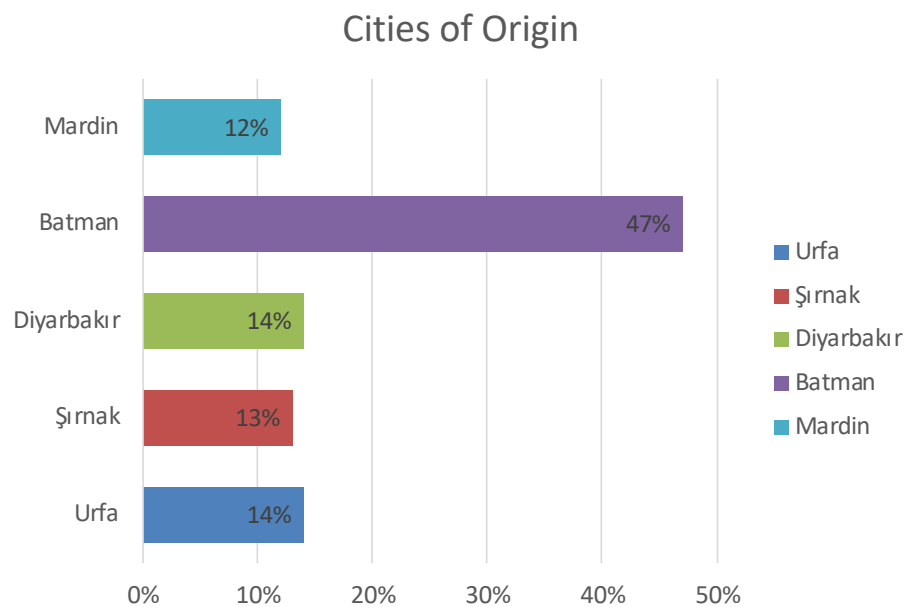
# **EVALUATION of FINDINGS**

## ***General Profile of Workers in 2018***

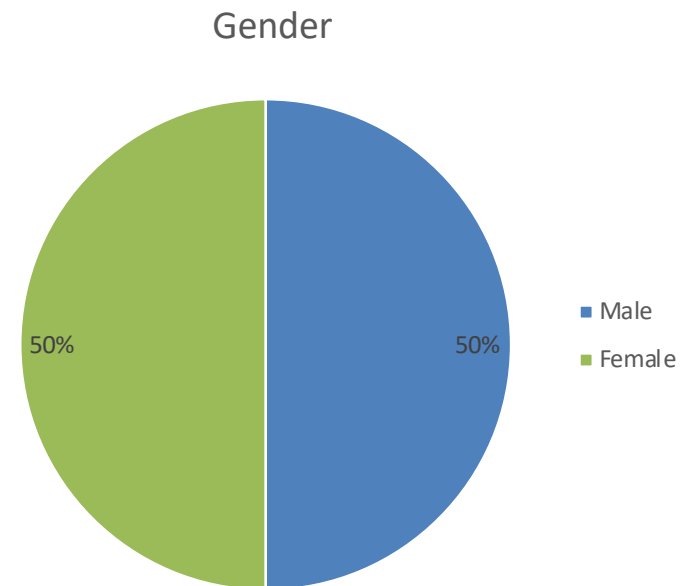
*(Based on the data collected during garden visits)*

## General Worker Profile – *City of Origin & Gender*

Data collected from 90 workers in 7 gardens in Beyören and Balatlı villages show that workers are coming from an array of different cities in South Eastern Turkey and nearly half of them are from Batman.



Although distribution rates vary from city to city, overall the number of males and females are balanced. Gender distribution is evenly split in the overall sample.



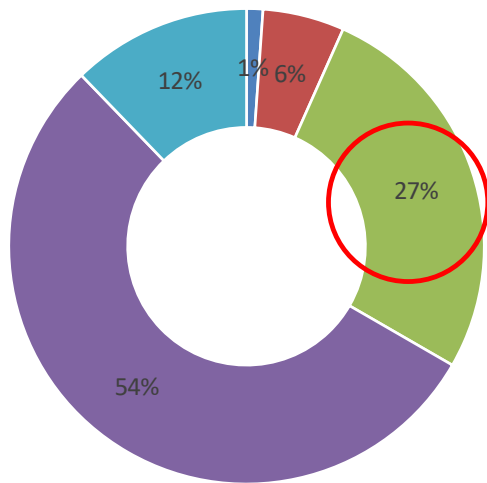
2018 Balsu Internal Audit Data shows that females constitute 52%, and males constitute 48% of the overall visitor groups in two villages (n=471). It should be noted that Balsu data is collected from all group members at household level, who travelled to the villages, a part of them do not necessarily work in the gardens.

## General Worker Profile – Age Breakdown

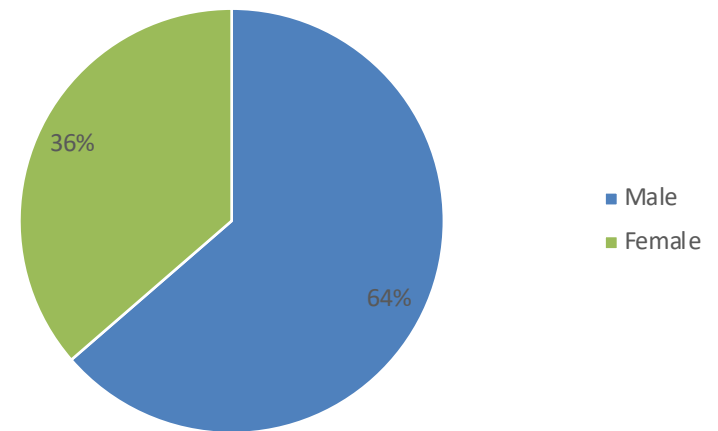
A young population works in the hazelnut harvest, as 88% of the workers are below 30 years of age. Young workers (workers who are 16 and 17 years old) constitute the second largest age group with 27% in 2018. This rate matches with Balsu Internal Audit findings which suggest that members of this age group travel to the region for work. Additionally, it has been observed that a considerable part of young workers traveled to the harvest zone in peer groups rather than as family units.

Age Breakdown

■ 8-12 y.o. ■ 13-15 y.o. ■ 16-17 y.o. ■ 18-30 y.o. ■ 31 & above



Gender Breakdown of Young Workers



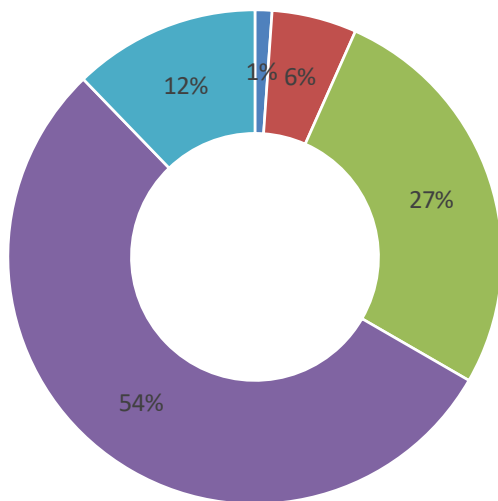
*Gender breakdowns are balanced in all age groups, except young workers. Males outnumber females nearly in 2 to 1 in this group.*

# Number of Young Workers Over Time

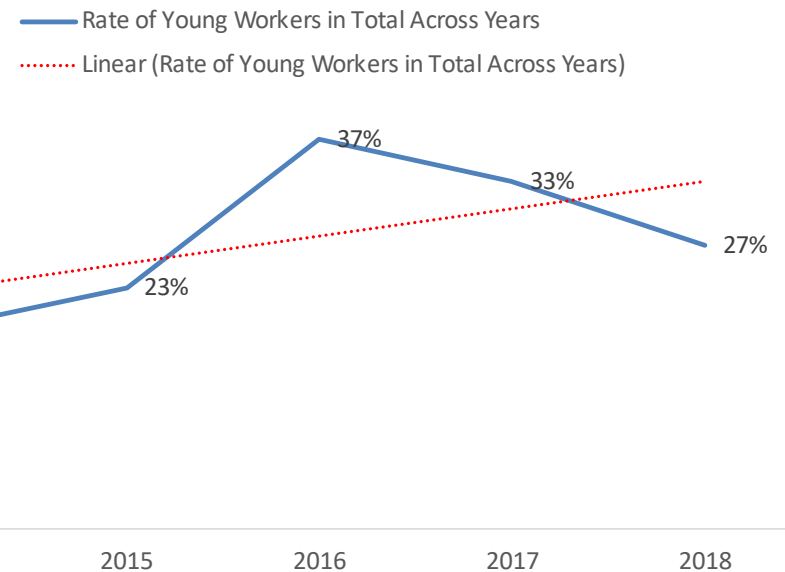
Young workers have made up at least 20% of the labor force in the last 5 years according to 2014-2017 IEM data and 2018 FLA Verification/Evaluation Study. An upward trend is particularly visible between 2014-2016, with 2016 being the peak year. According to 2016 FLA field observations, this peak was caused by the restart of armed conflict in the cities of origin and families' instinct to send the young population away from conflict zones. The region has become relatively less conflictive since 2016 though the rate of young workers did not fall below 25%.

### Age Breakdown

■ 8-12 y.o. ■ 13-15 y.o. ■ 16-17 y.o. ■ 18-30 y.o. ■ 31 & above



### Rate of Young Workers in Total Over Time \*



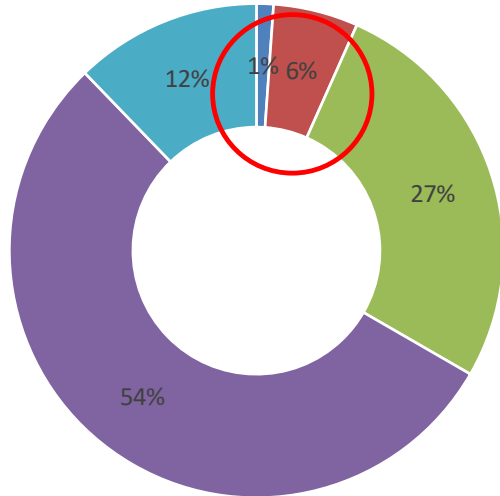
\*Data collected from Beyören or/and Balatlı villages during IEMs were taken into account to ensure an even comparison. Records start from the year 2014 as no individual data was collected for two villages during the 2013 IEM.

# Children Engaged in Child labor in the Gardens

2018 Balsu Internal Audit Data shows that children below 16 years old constituted 21% of the total migrant workers in two villages. According to the findings of this study, 7% of the total interviewed individuals in the gardens (total of 6 children) expressed to be 15 years old and below, thus engaged in child labor. Workers under 16 years of age were identified at 4 of the 7 gardens visited. All working children stated that they were working voluntarily to contribute to the family income and make money for their school expenses.

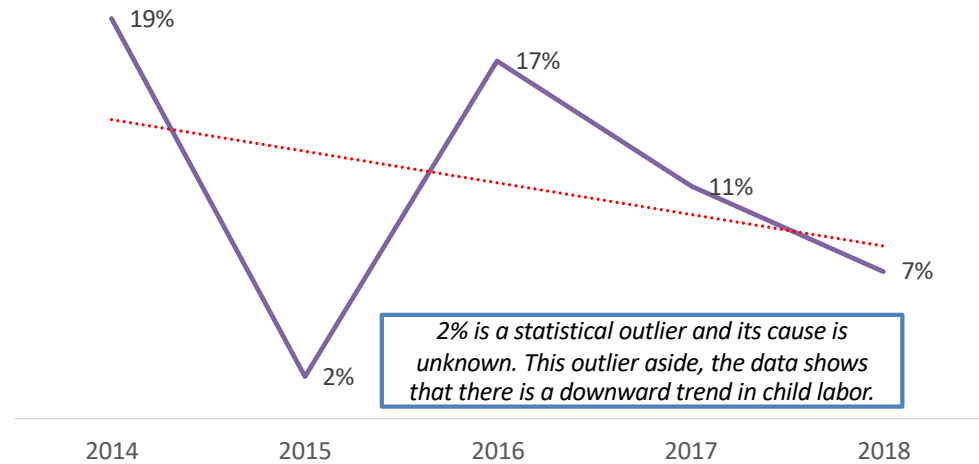
Age Breakdown

■ 8-12 y.o. ■ 13-15 y.o. ■ 16-17 y.o. ■ 18-30 y.o. ■ 31 & above



Rate of Children in Total Over Time\*

— Rate of Children in Total Across Years  
 ..... Linear (Rate of Children in Total Across Years)

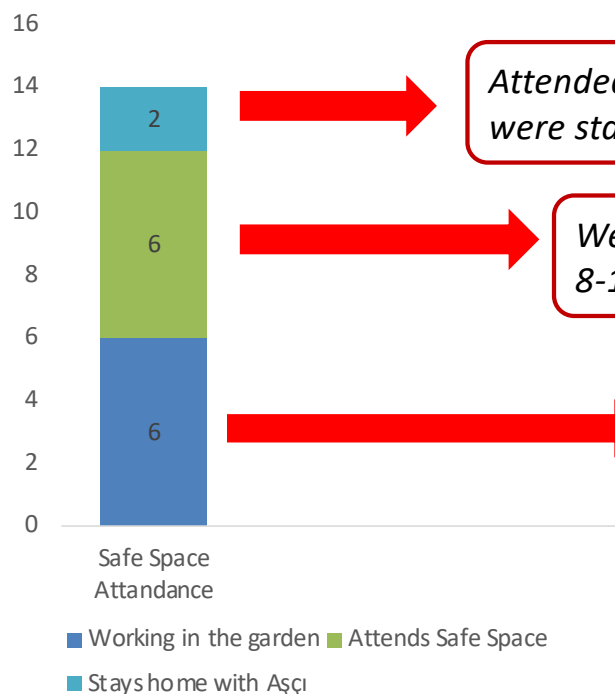


2% is a statistical outlier and its cause is unknown. This outlier aside, the data shows that there is a downward trend in child labor.

\*Data solely collected from Beyören or/and Balatlı villages during IEMs were taken into account to ensure an even comparison. Relevant records start from the year 2014 as no separate data was collected for two villages during 2013 IEM

## Options for Children in the Region

In 7 worker groups, it was found out that a total of 14 children (15 years old and below) traveled to harvest zones with their families. All are aware of safe space activities and almost all of them have experiences with safe spaces. Half of those who did not attend a safe space in 2018 are drop-out cases. These indicators are a sign of a well performed safe space/summer school program in terms of accessing family and children.



*Attended the school for a while but they could get along with other children. They were staying at home with 'Aşçı' (cook) at the time of evaluation.*

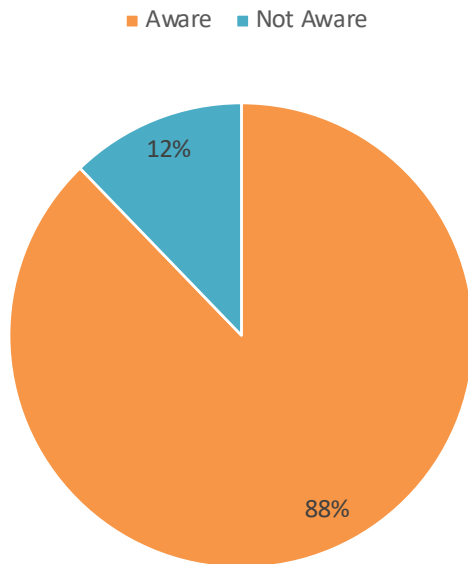
*Were attending safe space during the time of evaluation. 5 of these children are 8-10 years old; the remaining child is 15 years old.*

*6 children were working in the garden during the time of evaluation. It was observed that 2 of them formerly attended safe spaces:*  
*-A 15-year-old attended the safe space for a couple of days in 2018 but got into a fight with other children. He did not want to go back in the aftermath of this fight despite the efforts of persuasion.*  
*-Another 15-year-old attended the school regularly for the previous 4 years but preferred to work and earn money in the garden this year.*

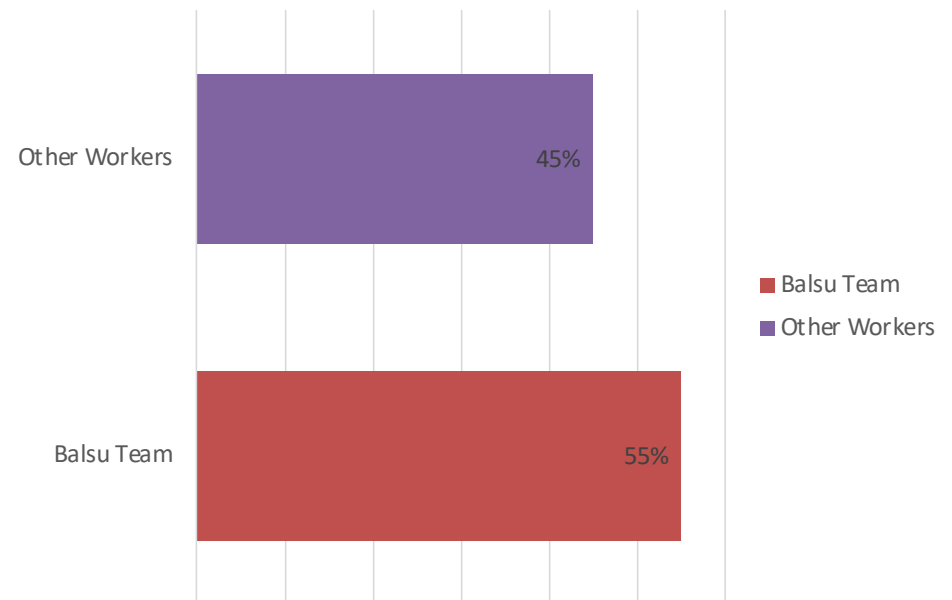
## Safe Space Effect – Awareness Rate

88% of workers interviewed in the gardens expressed that they are aware of the safe spaces and there is one nearby. High awareness rate in 2018 is of key importance considering the comments in previous years' IEM reports about Balsu and GHF's limited access to children and families. Interviews conducted in the field in 2018 signal that Balsu's expanded field team, their close ties with the garden owners and GHF's close connection with labor contractors significantly contributed this high level of awareness. These findings suggest that safe space project took roots in these villages and it is successfully integrated into the other components of Balsu's program.

Safe Space Awareness



Source of Information

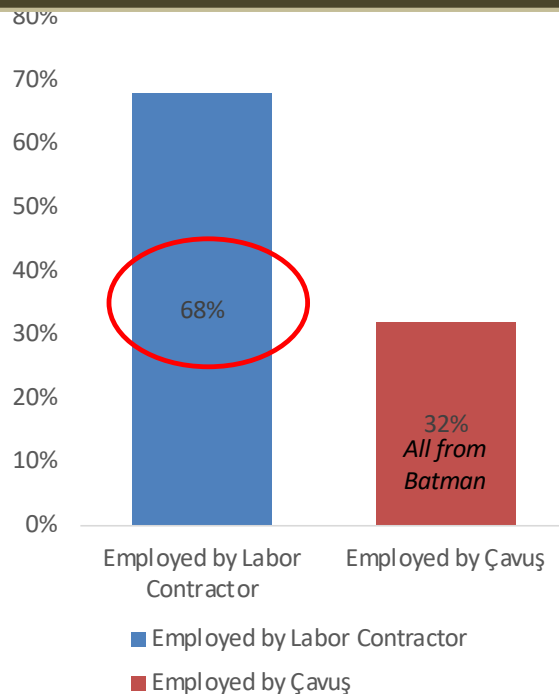




# On Access to Employment

All workers interviewed within the framework of this project were employed through an intermediary. Participants' accounts indicate that the intermediaries continue to be their employer point of contact during the harvest, and it is almost unthinkable for workers to establish a direct connection with the garden owners.

It was observed that the classic labor contractor model is being challenged by a sub-group called supervisors ('Çavuş'). These supervisors establish their own business connections with employers without being bound to any labor contractor. They work with small groups; the worker number per group usually varies between 10 and 20.



Intermediaries are the guides and guarantors during the harvest and their service comes with a price.

- For more than half of the workers, the intermediary is their perceived employer. They receive all the necessary information about their work from him/her and s/he takes care of their needs during the harvest. They receive their wages from the intermediary as well.
- Accordingly, intermediaries are the main contacts to go to for feedback and complaints about all matters. Only 14% of the workers recall that they were informed about the company grievance hotline, adding that they would first prefer talking to their intermediary in any case.
- These contractor services have a price - while labor contractors deduct 10% from workers' daily wages, supervisors take their money from the garden owner. It was stated that a supervisor takes only a single wage if he only supervises the workers and double wage if he additionally works with them.
- **All workers stated that usually intermediaries (labor contractor or supervisor) take care of their transportation and food costs and they often get indebted to them before leaving their city of origin. They do not see the proof of payment for the expenditures (in other words, the exact amount they are indebted) and intermediaries deduce these costs from the lump sum wage payment made at the end of the harvest.**

A world map in light gray with a grid of latitude and longitude lines. A solid red horizontal bar is at the top of the page. The text is centered over the map.

## **EVALUATION of FINDINGS**

*In-depth Evaluation of Prioritized Areas  
of Interventions*

***SAFE SPACE***

## SAFE SPACE in Beyören– Key Result Chain Targets

	Outcomes	Outcomes indicators	Impact	Impact Indicator			
Target	<p>(1) Informing children's families about activities and summer school</p> <p>(2) Facilitating access to education and safe areas for children during harvest</p> <p>(3) Facilitating access to education and safe areas for children through referrals to public institutions</p>	<p>Indicator 1. A minimum of 80% of the children attended curricula/activities</p> <p>Indicator 2. Number of children found during internal monitoring who were referred to the summer school</p> <p>Indicator 3. # of children provided with nutritious lunch</p> <p>Indicator 4. # of children who showed improved behavior in terms of hygiene.</p>	<p>(1) To contribute to reducing child labor by providing a safe space.</p>	<p>Indicator 1: # of children found in the hazelnut gardens</p>			
Evaluation	<p>Indicator 1. A minimum of 80% of the children regularly attended curricula/activities – <b>35 children (42% of total) had an attendance rate of 80% and above.</b></p> <p>Indicator 2. The number of children found during internal monitoring who were referred to the summer school - <b>This number was 51 in 2018. 51% of children found during internal monitoring were registered in the safe space in 2018.</b></p> <p>Indicator 3. # of children provided with a nutritious lunch – <b>All attending children are provided with an overall nutritious lunch</b></p> <p>Indicator 4. # of children improved behavior in terms of hygiene - <b>The team was unable to evaluate 'improved behavior in terms of hygiene' indicator due to lack of data.</b></p> <p>There are also other positive signs indicating outcome level targets are achieved or about to be achieved:</p> <p>(1) Informing children's families about activities and summer school – <b>Information on child labor and safe spaces were communicated to all workers accessed in 2018 via training sessions.</b></p> <p>(2) Access to education and safe areas for children during harvest facilitated – <b>88% of workers interviewed in the gardens and all of their children were aware of the safe space and its activities.</b></p> <p>(3) Access to education and safe areas for children through referrals to public institutions facilitated – <b>72 children were referred to public services in 2018.</b></p>		<p>(1) To contribute to reducing child labor by providing a safe space – <b>The child labor rate is in a downward trend across the years according to the findings of garden visits. All interviewed parties credited the safe space in this regard.</b></p> <p>Please also see slide 68 – Evaluation According to the FLA Benchmarks.</p> <div style="text-align: center;"> <table border="1"> <tr> <td style="background-color: #008000; color: white; padding: 5px;">Targets Achieved</td> </tr> <tr> <td style="background-color: #FFD700; color: black; padding: 5px;">In Progress</td> </tr> <tr> <td style="background-color: #800000; color: white; padding: 5px;">Targets Unachieved</td> </tr> </table> </div>		Targets Achieved	In Progress	Targets Unachieved
Targets Achieved							
In Progress							
Targets Unachieved							

## SAFE SPACE in Beyören

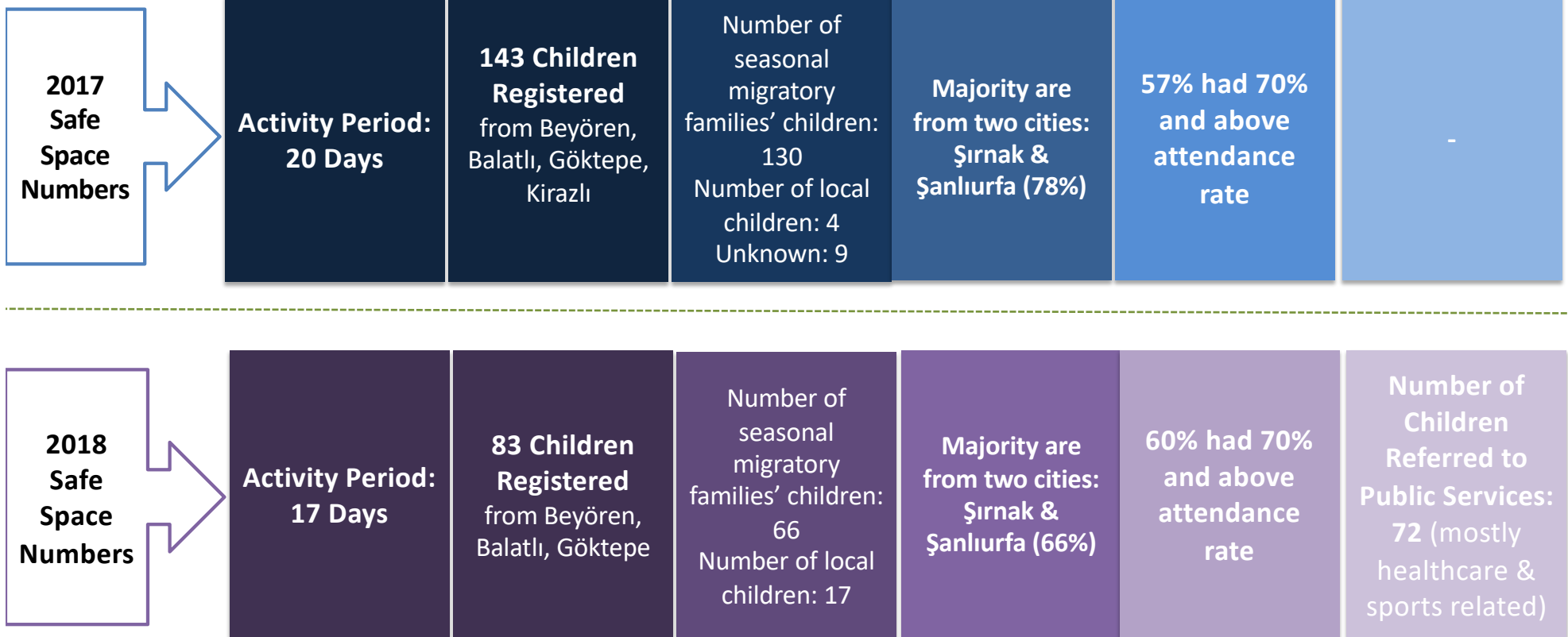
*Combined analysis of data collected from the gardens since 2014 and findings of interviews conducted with children attending the safe space, their families, garden owners, and safe space staff demonstrates that **safe space contributed to the reduction of child labor in the region.** Unfortunately, quantitative data for 2014-2018 are either limited or unavailable\* and thus, do not allow determining the exact effect of safe space on child labor.*

*Interviewees' accounts suggest that **efforts have been intensified and the project matured particularly in the last 2 years (2017-2018).** Expansion of Balsu's social team in the field and GHF's deepening relationship with the labor contractors from Mardin and Şanlıurfa allowed for **increased access to the families.** Once they gain access to the families and children, Balsu and GHF staff have usually a good chance to convince them to register children in a safe space. **However, securing attendance remains an issue, especially for older children (12 years old and above).***

*\*Data collected by the safe space staff cannot be filtered in a way that only give Beyören School's results in 2014 and 2016. The safe space in Beyören was not operational in 2015 and children in the region were transported to Cumhuriyet school. Village based data collected by the Governorship is only available for 2017, Balsu Internal Audit data had to be used to assess the research universe in 2018.*



## 2017 & 2018 Beyören Safe Space Numbers at a Glance



## Number of Children Registered

**2017 Safe  
Space  
Numbers**

**130 Children from  
Seasonal Agricultural  
Worker Families  
(SMWF) Registered**  
*(Includes the students coming  
from 4 villages – Beyören, Balatlı,  
Göktepe, Kirazlı)*

**Number  
of  
Children  
in the  
Region in  
2017**

**210 Children from  
SMWF Detected in  
the Region by the  
Gendarmerie Records**  
*(Includes the students coming  
from 4 villages – Beyören, Balatlı,  
Göktepe, Kirazlı)*

The safe space registered **68%** of children in the region in 2017

**2018 Safe  
Space  
Numbers**

**51 Children from  
Seasonal Agricultural  
Worker Families  
Registered** *(Numbers  
filtered for Beyören & Balatlı)*

**Number  
of  
Children  
in the  
Region in  
2018**

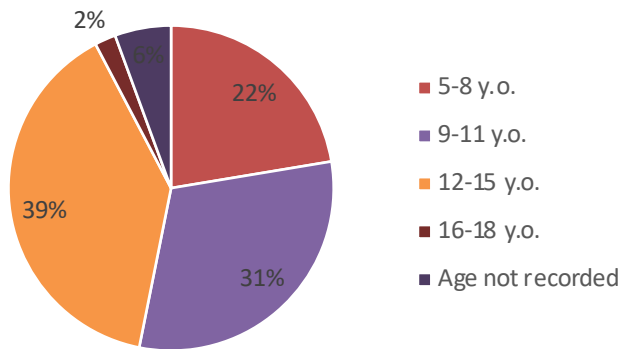
**101 Children  
Detected by Balsu  
Team**  
*(Numbers filtered for Beyören &  
Balatlı)*

The safe space registered **51%** of children in the region in 2018.  
**The regional coverage rate** of the target group is **42%** according to '2018 Report on Social Support Action Plan for Seasonal Agricultural Workers'

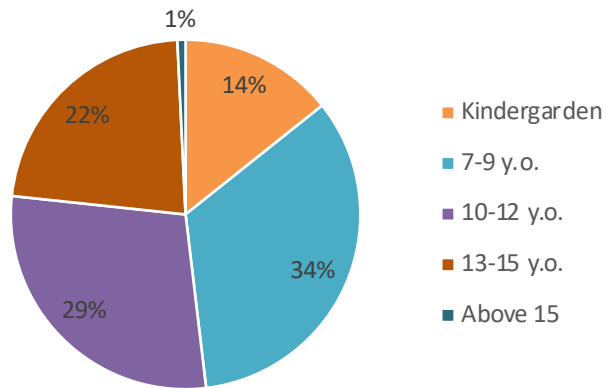
*It should be noted that data in 2017 includes the students from Göktepe and Kirazlı too. Beyören-Balatlı specific breakdown could not be accessed due to data confidentiality reasons as the Ministry of labor and Social Security was the main partner of the project in 2017.*

# 2017-2018 Records – Age & Gender Breakdown

Age Breakdown 2017



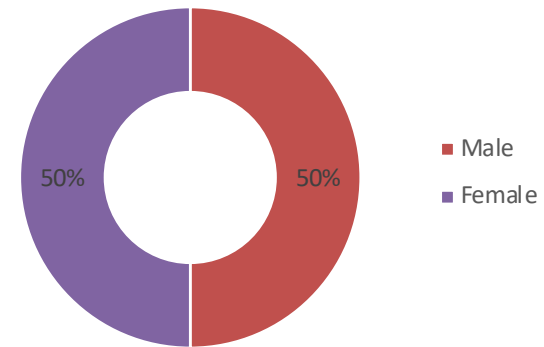
Age Breakdown 2018



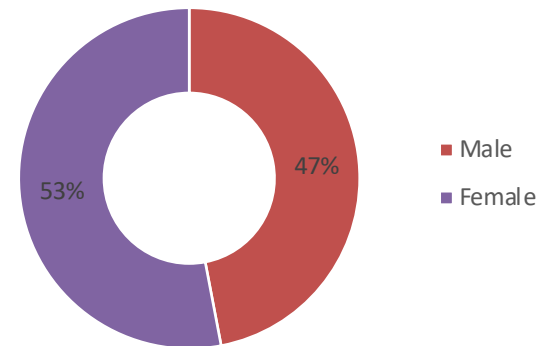
*Age breakdowns show that the safe space performs well in accessing older children.*

*While 39% of registered children were 12-15 years old in 2017, 22% were 13-15 years old in 2018. It should be also considered that 12-year-olds were counted in a separate group in 2018.*

Gender Breakdown 2017



Gender Breakdown 2018

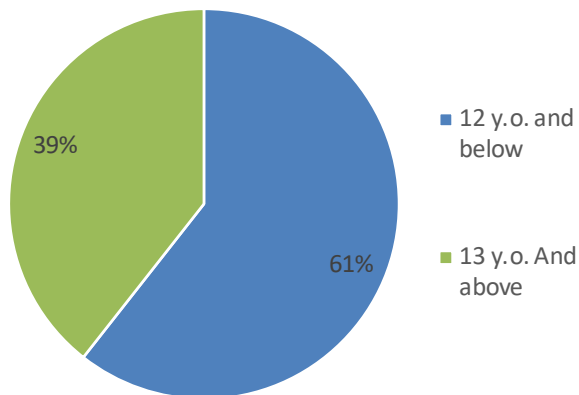


*It can be seen that gender breakdown is balanced both in 2017 and in 2018*

## Sign of a Maturing Project - Attendance Across the Years

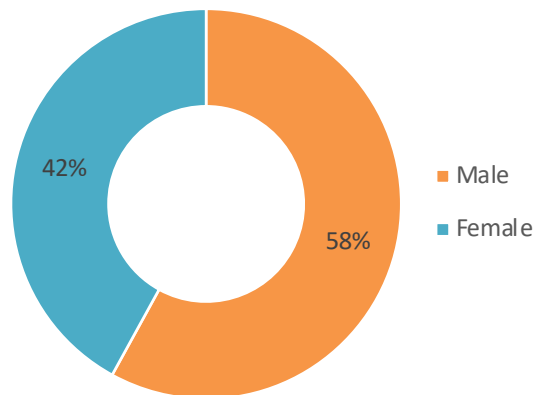
According to 2018 records, 33 out of 83 children (40%) attended the safe space in Beyören consecutively in 2017 and 2018. During the interviews with students and safe space staff, different parties emphasized that there are children who have been attending the summer schools in the region for the last 4 years consecutively and progress has been made with these children and their families. Unfortunately, records only allow tracing of the numbers back to 2 years ago.

Age Breakdown



Majority of those attending the school for the last 2 years are 12 years old and under.

Gender Breakdown



Males outnumber females but the gap is not wide.

*'We had to start from scratch the first year; we had to teach them how to behave in class. They would not even sit in class and they would not listen to us. With time and experience, we got used to each other. We only started to teach proper classes last year. You can easily spot the difference between a newcomer and old student now.'*

Safe Space Teacher

*'For example, we see that former students remember last years' learnings and wash their hands when they get to school. New students learn from their example too.'*

Safe Space Staff



## In Depth Evaluation Areas – Access & Securing Attendance

Access to children and securing their attendance are key tasks of safe space staff. In the Beyören case, it has been observed that GHF has better access to families in recent years, through continuous attendance of older children requires close follow up.

**Access to Children & Families:** GHF's close collaboration with labor contractors since 2017 considerably boosts the efforts in this area. Labor contractors acted as gate openers in the field since the 2017 Şanlıurfa interventions (GHF expanded its web of collaboration and reached out to the labor contractors from Mardin in 2018, too) and continued to facilitate access to families since the 2017 harvest. They regularly give information to the safe space staff about new arrivals so that they can visit the families. Also, they encourage families to send their children to the safe spaces.

**Attendance Rates:** The attendance rate is relatively high for children 12 years old and under. Findings of interviews show that for families, sending small children who are unable to work full days in the gardens to school is practical. On the other hand, it is observed that age 12 is a significant threshold for the families and beyond this age, children are perceived to be able to work like adults. Safe space staff state that it is especially difficult to ensure this group's attendance and even those registered are very likely to cease attending once the harvest fully starts. It is seen that there is a follow-up system in place to pull these children back to school. Follow-up starts with a phone call to the family and they are visited at their house if the child does not return to school. However, GHF and Balsu have almost no leverage if the family and child refuse to return. It is observed that scholarships offered by GHF (in exchange for regular safe space attendance and school attendance during the term) may prove to be an attractive carrot in some cases.

*'I would definitely be working in the garden if it was not for the school'*

M. is 13 years old; he traveled to Beyören from Mardin-Dargeçit with his mother, younger sister, elder brothers and cousins for the 2018 harvest.

The family has been making the journey to the region for the last couple of years for work. Last year, M. started to work with his family in the gardens too but one day his path crossed with GHF team visiting their house. His mother and eldest brother decided to send him to school when they heard that he would get a scholarship.

M. loves attending the summer school and he especially enjoys art and crafts workshops in the afternoons. He insisted that he attend the school this year too and his family did not object since he would receive his scholarship. He says that he would have to work in the garden from 7 a.m. to 7 p.m. under the heat, if it was not for the school and he would do anything in his power to attend the school next year as well.

## In Depth Evaluation Areas – *Education Content & Cultural Diversity*

The safe space performs well in two key evaluation areas education content and cultural diversity. It is especially noteworthy that feedback from all involved parties is collected and taken into account to improve the existing system and practices in both fields.

**Education Content:** The school day is divided into two parts. Following the targets of the Ministry of National Education (MoNE) for each age group, children take more academic courses such as Turkish and Math by the MoNE teachers in the mornings. Reading (for 7-9 year olds), punctuation, the formation of texts and algorithm are some of the topics in these courses. Both teachers and safe space staff emphasize that even though the content is academic, they make an effort to make these topics more fun and easy to follow. Past years' experiences show that playing games, storytelling like teaching and lab experiments during the courses are more likely to increase children's level of engagement. Making the summer school 'a fun place' is particularly important for attracting children above 12 years old. It should be noted that all these activities require a rich source of material and GHF materials are somehow lacking compared to last years according to teachers. It is added that materials are left at the school at the end of summer and it is used by the local students during the term.

There are arts and crafts workshops run by volunteers after lunch; workshops are the favorite part of the day for most the children. Two factors render the workshops popular: 1- They can show their creative sides and take home the final products as memories, 2-Workshops are run by volunteers who are young and fun to be around. 'Coolness' factor of volunteers considerably increases the attractiveness of the school for older children.

**Cultural Diversity:** Children, teachers and safe space staff believe that the safe space performs well in terms of cultural diversity. GHF staff and teachers have prior experience with the target group and there are Kurdish speakers among them. Team of volunteers who are constantly in communication with the children all day long receive orientation training before they start their work and they are supported by the school counselors during the term. On the other hand, there is a quota for local children and due to the effect of the 'Strong Woman. Strong Agriculture Program,' more families look favorably on sending their children to the safe space. This makes cultural diversity an even more hot topic. Equal treatment is defined as the main principle by the staff and teachers and two main native languages (Turkish and Kurdish) are both used in the classroom and the playground. Music, dance and food of different regions are also used to create a multi-cultural environment. All these factors facilitate warming up and cohesion of children coming from different cultural backgrounds. Nonetheless, despite the best efforts language can be a source of tension, especially while teaching. Students in a class may not be proficient in a common language and alternately repeating the topic in all native languages may considerably slow down the pace (especially if there are Arabic speakers too). Feedbacks from children, teachers, and volunteers are evaluated to come up with the best solution in each case.

## In Depth Evaluation Areas – *Physical Environment, Food Provided & Hygiene Education*

Evaluations on 'Physical Environment' and 'Hygiene Education' show that safe space perform fairly well in these issues; though experts' support can be taken to identify more concrete standards and indicators to determine children's needs and follow up their progress.

**Physical Environment:** According to the Social Impact Evaluation (SIE) team's observation and findings of the interviews conducted with relevant target groups, it can be concluded that the physical environment created for the children is satisfactory. No complaints were made about the general physical capacity of the space nor the main components such as classes, playground, kitchen and toilets (except the fact that there are accessibility problems for potential disabled students). This is partly due to the fact that Beyören is an active and fully functional school during the school term.

Additionally, during the interviews with teachers and safe space staff, it was mentioned that GHF and Balsu help with the most pressing physical needs of the school as their budget allows. Overall, the families and the members of the local community perceive the school as a physically safe space that prevents children from 'wandering in an unsupervised manner' in the village and to the potential areas of danger.

### **Hygiene Education:**

It is targeted to support the establishment of certain habits such as washing the hands before the meals and face in the mornings. Also, occasional lice and general health scans take place once the school reach the maximum number of children and hygiene kits are distributed to children.

Per the accounts of parents, the information provided on hygiene stays with the children (particularly if the children have been attending the school for 2 or more years) and they make an effort to pass this information to other family members but there is no data available that would support these claims and prove behavioural change. It is observed that no indicators have been identified to follow children's behavioral change in this subject and the safe space staff solely collect observation notes. It is expressed that short operation time of summer school is a challenge in terms of creating behavioral change during one summer school term.

## In Depth Evaluation Areas – *Food Provided*

Evaluations on ‘Nutritious Quality of Food Provided’ show that overall the safe space performs well in this area. However, consultation with a professional nutritionist would be helpful to ensure that nutritious food is served at every meal. Also working with a certified catering firm is recommended to prevent any potential conflict with local authorities.

Currently, the World Health Organization (WHO) does not provide any dietary recommendation of global application for children and adolescents. Yet individuals are advised to:

- **Increase the consumption of fruit and vegetables, as well as legumes, whole grains and nuts;**
- **Limit the energy intake from total fats and shift fat consumption away from saturated fats to unsaturated fats;**
- **Limit the intake of sugars.**

**Nutritious Quality of Food Provided:** GHF takes the menu of Akçakoca Teacherage as an example and its catering partner puts together a daily menu following it. However, the local authorities pointed out that catering firms who have the relevant certification for this task are very few in Akçakoca and GHF was not working with one of them during the time of the fieldwork.

As a daily routine, breakfast, lunch and two snacks are offered to all attending children. It is stated that attention is paid to include carbohydrates, protein, and fat at the main meals to form a healthy menu. Also, the importance of offering different types of food each day to expand children’s taste palate is recognized. Snacks should be energizing and somehow act as a treat; therefore one portion of fruit and one portion of packed snack (chocolate wafers, cakes or bars) constitute mid-day snacks. It can be said that a packed snack portion is the only menu item that requires re-evaluation when WHO advice is considered.

A world map is shown in a light gray tone, serving as a background for the text. A solid red horizontal bar is positioned at the top of the page. The text is centered and uses a mix of bold, italicized, and standard fonts.

## **EVALUATION of FINDINGS**

*In-depth Evaluation of Prioritized Areas  
of Interventions*

***LABOR CONTRACTOR TRAINING***

# LABOR CONTRACTOR TRAINING – Key Result Chain Targets

Outcomes		Outcomes Indicators	Impact	Impact Indicator
Target	(1) Labor contractors' learning about their rights, occupational safety, child labor and complaint mechanisms at the end of the training will meet GHF targets.	<p>Indicator 1: The cumulative score of learning from the training quiz is at least 30 out of 40 (40 is the max score)</p> <p>FLA also recommended:                      Indicator 2: number of Labor Contractor registered with İŞKUR                      Indicator 3: number of worker under contractual agreement</p>	Labor Contractors' awareness improved on their rights, occupational safety, child labor and complaint mechanisms, contracts/working conditions .	<p>Indicator 1: Number of children they bring to harvest area for employment / # of Children found in the hazelnut garden.</p> <p>Indicator 2: # of worker working 8 hours</p> <p>Indicator 3. # of worker receive minimum wage without deduction.</p>
Evaluation	<p>Indicator 1: The cumulative score of learning from the training quiz is at least 30 out of 40 – <b>Achieved according to GHF records.</b></p> <p>Indicator 2: number of Labor Contractor registered with İŞKUR – <b>No labor contractor registered with İŞKUR yet according to GHF records.</b></p> <p>Indicator 3: number of worker under the contractual agreement – <b>Only 1 case is recorded but the contract is not be approved by İŞKUR since the labor contractor is not certified. From this point on in this report, contract status will be 'no contract made.'</b></p>	<p>Indicator 1: # of Children found in the hazelnut garden – <b>Rate of children is 7% in 2018 and all parties state that labor contractors are more sensitive about the issue. Interviewed labor contractors brought a total of 650 workers to Akçakoca in 2018 and claimed that they are providing for most of the labor need in two villages.</b></p> <p>Indicator 2: # of worker working 8 hours - <b>No change in working hours in 2018</b>                      Please see slide 80– Evaluation According to the FLA Benchmarks.</p> <p>Indicator 3. # of worker receive minimum wage without deduction – <b>No change in terms of deductions in 2018</b>                      Please see slide 84– Evaluation According to the FLA Benchmarks.</p>		

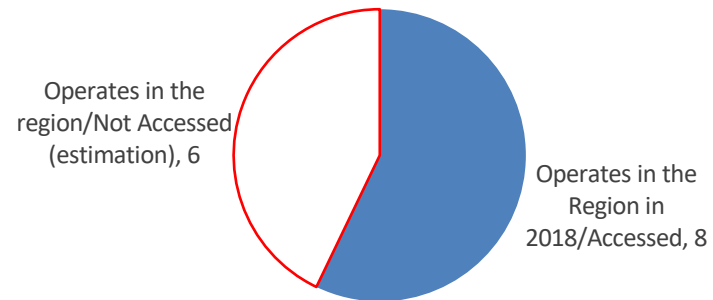
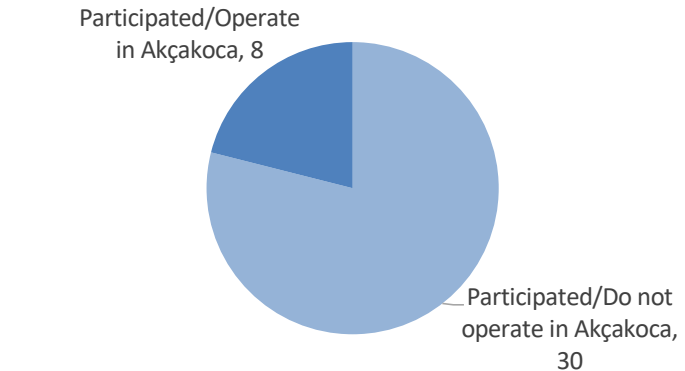
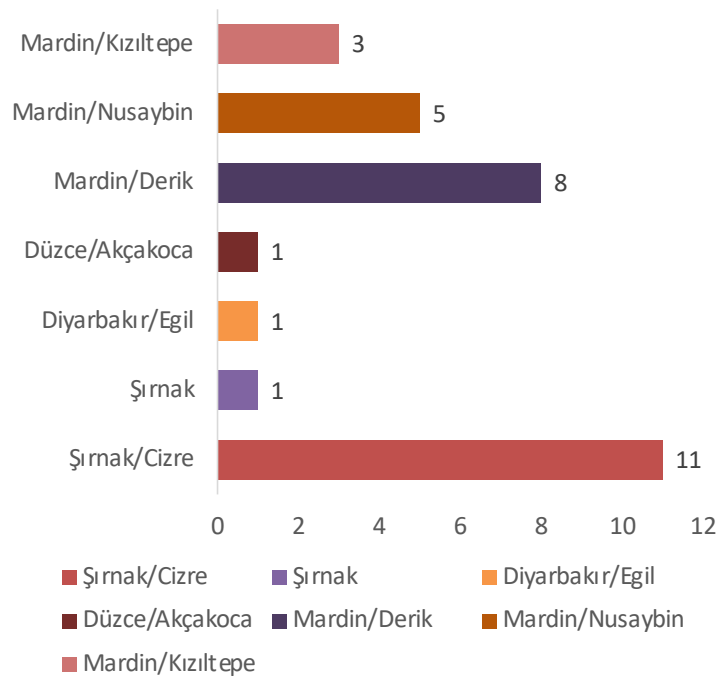
*It is observed that labor contractors are more likely to take steps forward in relatively easy subjects for themselves such as child labor. Their accounts indicate that more likely the stick of law enforcement authorities would motivate them to take concrete action on issues such as working hours, deductions and working under contractual agreement. On the other hand, it should be noted that GHF and Balsu conducted this training in Mardin only in March 2018. They worked with labor contractors from Şanlıurfa in 2017 and the FLA Demographic Profiling Study show that this group largely travels to the Eastern Black Sea Region for work.*

Targets Achieved
In Progress
Targets Unachieved

# LABOR CONTRACTOR TRAINING

GHF organized an awareness raising training for labor intermediaries in Mardin in March 2018.

A total of 30 intermediaries from Mardin and neighboring cities participated in 2 days of intensive training. According to estimates, GHF training sessions accessed 57% of the labor intermediaries operating in Akçakoca-Balsu supply chain in 2018.



*Balsu closed the gap in this graph by collaborating with Akçakoca Governorship to deliver a training for 13 labor contractors operating in Akçakoca just before the Harvest.*

# LABOR CONTRACTOR TRAINING - *In-depth Evaluation*

Interviewed labor contractors describe the event as 'a meeting in which labor contractors discussed common problems' and they claim that they did not learn anything completely new.

Child labor and discussions about working hours were the most recalled subjects.

## Awareness Raising Training Topics

Access to Rights for labor Intermediaries

Introduction to Service Provider Institutions

Access to Rights for Seasonal Agricultural Workers

Child labor & Children Working in Seasonal Agricultural Work

Occupational Health & Safety in Agriculture

The Importance of Contract

Grievance Mechanism

*'I will speak for my own group, the number of children is decreasing each year. It does not mean that child labor is eliminated all together but these things take time. Nonetheless, it is apparent that there is change compared to previous years.'*

**Change in Awareness:** Participants claim that they did not learn anything completely new though training served to refresh their memories on certain subjects such as child labor. It has been observed that there are mental blocks limiting the impact of the training; some subjects (deductions is a good example) directly threaten their interests and they do not believe that a different solution is possible since it is thought that garden owners would not cooperate anyway. Additionally, some topics were perceived to be too complex to grasp conceptually with 2 days of training (e.g., grievance mechanisms).

**Change in Behaviour:** Despite the mental blocks, it is observed that change in behavior is possible when certain elements come together. The best example is child labor; this is a consensus issue in the villages at the moment and it is in their interest to comply with the requirements; therefore they feel more motivated to take action if they are not limited by major road blocks such as persistence of the family.

It should be added that close contact with GHF and Balsu teams has been a considerably motivating factor to take steps, proving that in the absence of follow up one shot training sessions have limited effect. Sense of cooperation and closeness developed over the months transformed the parties into partners.



A world map in light gray with a grid of latitude and longitude lines. A solid red horizontal banner is at the top of the page. The text is centered over the map.

## **EVALUATION of FINDINGS**

*In-depth Evaluation of Prioritized Areas of Interventions*

***STRONG WOMAN, STRONG AGRICULTURE  
PROGRAM***

## STRONG WOMEN, STRONG AGRICULTURE – *Key Result Chain Targets*

	Outcomes	Outcomes Indicators	Impact	Impact Indicator
Target	(1) Women will be able to participate in various steps of production with more consciousness and will contribute to the sector with better practices.	Indicator 1: # of workers working under contractual agreement	(1) To contribute to reducing child labor (2) To contribute improving working conditions (3) To contribute livelihood sources of the women	Indicator 1: # of Children found in the hazelnut garden Indicator 2: # of worker working 8 hours Indicator 3. # of worker receive minimum wage without deduction.
Evaluation	Indicator 1: # of worker work under the contractual agreement – <b>No contract was made</b>		Indicator 1: # of Children found in the hazelnut garden – <b>The rate of children is the lowest in recent years according to garden visits and interviews with the participants indicate that they are sensitive about child labor. However, it was not possible to assess whether there were children in all participants' work groups or not. Therefore, it was not possible to reveal the effect of the project on child labor.</b> Indicator 2: # of worker working 8 hours - <b>No change in working hours in 2018</b> Indicator 3. # of worker receive minimum wage without deduction. - <b>No change in terms of deductions in 2018</b>	

*Overall, the project idea (which is based on the gap pinpointed during 2017 IEM results discussions – working with the women in local communities) is clearly relevant and attractive for the target group. Those who did not participate in the first round are insisting for a repeat and Balsu is planning to expand the project to Hendek region. Women's empowerment and contributions to the livelihood sources seem to be the core of this very new program at the moment.*

*This study's findings reveal that it is too soon to evaluate the effects of the project since traditionally women are not the main decision-makers in these areas and there is no sign of immediate change regarding their positions. Nonetheless, accounts suggest that the project has been helpful so far in familiarizing the other components of Balsu Social Program with the target group and bridging the gap with the local community.*

Targets Achieved

In Progress

Targets Unachieved

# STRONG WOMEN, STRONG AGRICULTURE

## According to GHF 2018 Proposal Prepared for the FLA-USDOL Project:

‘Overall, the beneficiary of this project is the women garden owners or women members of garden owner families in Nestle’s hazelnut supply chain based in Akçakoca district of Düzce. However, since the overall objective of the project is empowering women garden owners or wives of garden owners in the hazelnut supply chain in order to contribute to sustainable hazelnut production through the families of participants, companies in the hazelnut supply chain, seasonal migrant families (including children) and local stakeholders are related beneficiaries of the implementation.’

As mentioned, women farmers are significant actors in the hazelnut supply chain. Their duties include but are not limited to:

- using chemical materials for fertilization,
- cutting branches to increase the productivity of hazelnut trees,
- driving tractors,
- carrying bags full of hazelnut,
- loading the bags on the trucks,
- picking,-
- monitoring and communicating with the workers,
- listening to the workers’ problems with hygiene, workload, working hours, health, etc.

(...)This project aims to reach these women farmers in Nestle’s hazelnut supply chain to empower, build capacity and support the visualization of their active and thriving participation to agricultural production for the benefit of other actors in the production process.

## Project Facts & Numbers

**Villages:** Akçakoca, Beyören, Balatlı & Altunçay

**Training Method:** Regular group discussions with experts and trainers for a duration of 1,5 month

**Number of Participants:** 53 Female Farmers

### Training Sessions:

Good agricultural practices,  
Occupational health and safety,  
Child rights/labor rights related issues,  
Technological literacy,  
Financial literacy,  
Communication skills,  
Leadership,  
Conflict resolution,  
Entrepreneurship

# In-depth Evaluation – STRONG WOMEN, STRONG AGRICULTURE

While awareness levels on key subjects are improved, it can be concluded that women are more likely to take action in areas which directly affect the well-being of their families and their own lives such as good agricultural practices and issues related to their own empowerment.

More Motivated to Take Action

**Good Agricultural Practices:** This is the only topic that created **tangible change in behavior** since it touches upon a sensitive subject, livelihood of the whole family. Accordingly, learnings are shared with other family members immediately and mistakes made while taking care of the garden in the past years are not repeated this year. Interviewed participants claim that they started to see the positive results of their actions but the evaluation team is unable to confirm these statements.

**Women's Empowerment:** Training topics such as 'Conflict Resolution' and 'Communication Skills' hit close to home. Participants expressed that their lessons learned in these subjects would be useful while dealing with other family members though they were unable to fully apply them in their daily lives.

Entrepreneurship was another inspirational topic which gave them new ideas and motivated them to earn their own money. They have plans that would like to actualize but concrete results were yet to be seen at the time of the interviews.

Less Motivated to Take Action

**Child labor & labor Rights Related Issues:** It has been observed that training sessions in child labor created a considerable level of awareness though some information is still up in the air (such as the age limits) and their learnings did not fully translate into action in 2018. Nonetheless, it is noteworthy that women are better informed about and look more favorably upon the safe spaces now. They verbally encourage children in the working groups to attend the school though they do not insist if the family or the children prefer not to.

Awareness is lower in terms of labor rights-related issues but it should be emphasized that these issues are almost completely outside of their sphere of influence and action. Therefore, they could not even recall if they received training in this subject or not.

A world map in light gray with a grid of latitude and longitude lines. A solid red horizontal bar is at the top of the page. The text is overlaid on the map.

## **EVALUATION of FINDINGS**

*In-depth Evaluation of Prioritized Areas of Interventions*

***WORKER TRAININGS***

## WORKER TRAININGS – Key Result Chain Targets

	Outcomes	Outcomes Indicators	Impact	Impact Indicator
Target	(1) Improving awareness on good social practices, working conditions and OHS	Indicator 1. # workers who have increased awareness about their rights	(1) Improve workers' awareness on working and living conditions and Child Labor and protect worker health	Indicator 1. # of workers who are aware of Balsu's Grievance Channel Indicator 2 # of workplace related accidents-incidents reduced  The FLA recommended to make the indicator below an impact indicator: Indicator 3. # of workers who made contracts with farmers
Evaluation	Indicator 1. # workers who have increased awareness about their rights – Reached 915 workers in Akçakoca region in 2018 It is not possible to measure the increase in their awareness. All of the workers interviewed during the garden visits confirmed that they pay attention to OHS issues after the trainings. Also, they recalled that working hours, wages and child labor related issues mentioned. On the other hand, they could not recall anything about the contract and grievance channel issues.		Indicator 1. # of workers who are aware of Balsu's Grievance Channel – <b>Only 14% recalls it after the trainings</b> Indicator 2 # of workplace related accidents-incidents reduced – <b>Quantitative data unavailable for the evaluation, though it is said that they appreciated OHS training and try to act by their learnings.</b> Indicator 3. # of workers who made contracts with farmers – <b>No contract made</b>	

*It is seen that this area is not totally fit for evaluation within the framework of impact evaluation study since the training sessions were kicked off at the end of July 2018 and were still being carried out during this study's fieldwork. In fact, most of the interviewed workers claimed to receive training sessions in the last couple of days before the interviews. Main findings show that workers' awareness has mostly improved on OHS issues and some working conditions related subjects (outcome level targets) but impact level results are yet to be seen.*

Targets Achieved

In Progress

Targets Unachieved

## WORKER TRAININGS - *In-depth Evaluation*

Findings of the interviews conducted with the workers suggest that occupational health and safety is at the center of Balsu training sessions. Interview findings suggest that challenges of conducting training during the harvest would have a limiting effect on achieving targets set for this intervention. In this sense, delivering worker rights training sessions in Mardin in 2018 was a logical move.

- The usual challenges of conducting training sessions during the harvest apply in this case too. Per workers' accounts, compact 15 minutes training sessions focusing on selected issues such as health and safety hazards were carried out during 2018 Harvest. Nonetheless, workers express that they feel tired in the evenings and thus, unable to focus during the training sessions.
- OHS is the most recalled subject from the training sessions conducted in 2018 (it is recalled with all its sub-topics) and distribution of personal protective equipment (PPE) is a supporting element. All workers expressed that they were using distributed equipment and they were happy with the content of the kit. Balsu team also distributed first aid kits to supervisors in the gardens ('çavuş').
- It is stated that the Balsu team gives information about working hours (7 a.m. -7 p.m., workers should insist on having breaks), the estimated wage amount in 2018 and safe spaces as well.

### For Akçakoca Region:

Number of Workers Reached via Training Sessions in 2017 (*high yield year*)  
**= 1219**

Number of Workers Reached via Training Sessions in 2018 (*low yield year*)  
**= 915**



### TRAINING TOPICS

#### 1. Occupational Health & Safety;

- Emergency Numbers
- Heavy Lifting
- Injuries
- Insect, Scorpion, Snake Bite
- Safe Transportation
- Protective Personal Equipment

#### 2. Good Social Practices

- Working Hours
- Wages
- Contract
- Child Labor
- Feedback & Grievance Channel

A world map in light gray with a grid of latitude and longitude lines. A solid red horizontal bar is at the top of the page. The text is centered over the map.

# **EVALUATION of FINDINGS**

*Brief Evaluation of Renovation Projects*



# Brief Evaluation of RENOVATIONS

	Outcomes	Outcomes Indicators	Impact	Impact Indicator
Target	(1) The living standards of workers improved.	Indicator 1. # of worker satisfied with the shelter facilities provided.	(1) Decent living standards for seasonal migrant agriculture workers, labor contractors, and children are provided. (2) Safe space areas for seasonal migrant worker families' children created.	Indicator 1. # of workers, children who have access to clean water, electricity, proper toilets and bathroom;  Indicator 2. # of children who stay at home and do not go to garden due to provided shelter facilities.
Evaluation	<p><i>Renovations were not a priority evaluation area within the framework of this study. Therefore, findings in this section are mainly based on the accounts of a limited number of workers and cannot be quantified.</i></p> <p><i>Workers staying at the renovated houses mostly state that they are satisfied with the shelter facilities provided and they have access to most basic needs such as clean water, electricity, proper toilets, and bathroom. Their accounts signal to the improvement in the standard of living adequate for the health and well-being of the family, especially the children.</i></p>			

Targets Achieved

In Progress

Targets Unachieved

# Brief Evaluation of RENOVATIONS

Renovations are quick impact projects that boost the motivation of several harvest actors. It is observed that renovation works motivated other garden owners to improve the living standards for their own workers (though this was not translated into action by the time of the interviews) and also created an atmosphere of goodwill between the owners of renovated houses and their workers.

**General Level of Satisfaction:**  
High  
*(lower for younger workers)*

Workers are satisfied with the general conditions of renovated houses and facilities. Especially those who know the former condition of the renovated houses and older workers who 'had to endure much worse conditions in the past' are more content with the renovations and appreciate the garden owners' efforts. There are certain common complaints such as lack of washing machines and water shortages at the house. However, it is learned that water shortage is a common problem in the villages and they occur due to population growth experienced during the harvest. In general, village headmen attempt to regulate water supplies by cutting water off in the evenings.

**Effect on Their Daily Life: Positive**

Renovated houses are perceived to be more secure places and offer a standard of living adequate for the health and well-being of the family.

**Effect on Reduction of Child Labor: Positive**

Most importantly for the families, renovated houses are perceived to be safer spaces for their children. Their past experiences in the region were so negative that they claim 'it was downright unhealthy and dangerous for the children to stay at home.' It is also added that once the children go to gardens with their parents, sooner or later they start to work with the rest of the family.

**Effect on Their Work Performance: Positive**

Both garden owners and workers claim that renovated houses have a positive effect on workers' performance since 'working more diligently' is perceived to be a way of showing appreciation by the workers.

## Brief Evaluation of RENOVATIONS

### RENOVATION & WASH EFFORTS IN NUMBERS\*

Number of Houses Renovated	Village	Number of Beneficiaries
3	Beyören	47
5	Balatlı	77
5	Altunçay	72
1	Demiraçma	20
3	Melenağzı	50
1	Göktepe	20
2	Yeşilköy	27
<b>Total: 20</b>		<b>Total: 313</b>

Number of Washing Machines	Village	Number of Beneficiaries
2	Beyören	37
1	Balatlı	16
1	Göktepe	20
<b>Total: 4</b>		<b>Total: 73</b>

Fountain - Villages	Number of Beneficiaries
Beyören	1
Balatlı	2
Altunçay	1
	<b>Total: 4</b>

Number of Mobile WC	Village	Number of Beneficiaries
1	Beyören	15
2	Balatlı	35
1	Demiraçma	15
<b>Total: 4</b>		<b>Total: 65</b>

\*Tables show 2017 numbers taken from Balsu presentation.

A world map in a light gray color is centered on the page. The map shows the outlines of continents and is overlaid with a grid of latitude and longitude lines. At the top of the page, there is a solid red horizontal bar. The text 'CONCLUSION & RECOMMENDATIONS' is centered over the map in a bold, dark blue font.

# **CONCLUSION & RECOMMENDATIONS**

## Conclusion

This pilot study sought to delve deeper into the assessment of the interventions and to determine if the actions that Nestlé and Balsu have undertaken in their supply chain have led to an improvement in conditions for workers.

**Based on the study's findings, it can be concluded that especially the efforts on child labor proved to be fruitful and the safe space is one of the two intervention areas in which the impact target was achieved.** Child labor has become a hot topic in the intervention points as a result of the concentrated efforts of the companies. Government-level support in recent years opened the way further even if it mostly lacks muscle due to long-standing transition period pains in the public sector. It is observed that currently, child labor is a consensus issue for action by the majority of harvest actors in Balatlı and Beyören villages. However, mainly more structural elements such as cultural norms or poverty that have the potential to hinder the efforts.

It should be also noted that these **structural elements particularly block the improvement in young workers' conditions, a** group that constitutes a considerable part of the labor force. **Balsu has targeted to reach out to this target group** and started to work closely with them in Mardin in 2018 but at the moment, it is not known if more training rounds will follow or not.

## Conclusion

Safe spaces are currently at the center of child labor-related efforts in the villages. Findings of this study show that:

- **Safe spaces fill an essential gap for child labor-related efforts** – Currently, there is no other alternative in the villages that can guarantee a large number of children with access to a safe environment and provide them basic needs while their family members work in the gardens. Even though renovation projects target to transform accommodation points into safe living spaces, full supervision of children remains to be a problem in this setting, according to the local community members. In this sense, the safe spaces keep all parties content.
- **It is an impactful project that has achieved its main target** – Nestlé’s and Balsu’s actions have contributed to positive change in villages where child labor-related efforts concentrate and safe spaces play a key role in it. An overall comparison of the past years’ results signal a downward trend of child labor in the region. The safe spaces’ access rate to children in the region in the last 2 years confirmed by accounts of the interviewed parties indicates that the safe space is the force behind the downward trend. The project has been active in the region for more than 4 years, which is just enough time for it to take root in the region, getting acquainted with all harvest actors and pooling experience to improve the efficiency of the system. All these factors facilitate achieving impact level targets.
- **It is successfully feeding on other intervention areas** - Other components of Balsu’s Social Program, especially interventions targeting labor contractors and female community members, facilitate and feed the safe space activities. It is observed that network and connections with the harvest actors are vital to communicate the safe spaces’ actions and to increase coverage of the target group. It should be emphasized that having one implementing partner carry out all the mentioned interventions contributes to the interconnectedness of the activities.
- **There is still room for improvement** – Despite the fact that the safe space system is improving each year, according to stakeholder feedback, it is still a work in progress especially on issues such as follow up and attendance system, provision of nutritious food, and hygiene education. Although it is understood that budgetary limitations affect the pace of progress, close collaboration with Balsu to establish common standards and sub-targets is needed as well.

## Conclusion

**Renovation** is the second **intervention area in which impact target has been achieved**, though it should be noted that this was not a priority evaluation area in this study and conclusions are mostly observation and anecdote-based. It is observed that this is a quick impact project which answers to a common and very dire need of workers for safe and sanitary housing. Especially older workers, who 'have seen the worst conditions in the past years' appreciate more the work undertaken to provide a standard of living adequate for the health and well-being of the family, especially the children. Certainly, the improvement of accommodation conditions is another issue that most harvest actors agree upon as it touches upon a very basic human need.

Another area of consensus that carries the potential for quick impact is **occupational health and safety (OHS)**-related activities. This was an issue evaluated within the scope of '**Worker Training Sessions.**' Although, activities related to this intervention were very fresh (hence it was too soon to evaluate their impact) and took place during the very busy harvest season, it was seen that mostly **OHS component of the training left a strong impression** on workers as their learnings were vital and put to use during their daily work. Distribution of personal protective equipment strengthened the effect of this component too. Garden owners were especially content with this training subject too since its delivery is perceived to be a weight off their shoulders and it was conducted free of any cost to them.

In contrast, certain remaining training topics such as **wages, working hours, working under contracts** cannot be taken off or solved by a sole actor that easily. It is seen that these are topics on which all harvest actors should be in line and take common actions yet **all parties perceive it to be a zero-sum game, especially considering the fluctuations in the hazelnut price.** In the absence of government-level will and action that would break this stalemate, the companies seem not to prioritize pressing for improvement in these areas.

## Conclusion

Findings on **2018 Labor Contractor Training Sessions** confirm that the pace of change is particularly slow with respect to structural problems. Even though this is a new intervention area, it is seen that labor contractors were **more likely to take steps forward in overlapping interest areas such as child labor, rather than on issues like wages, deductions or contract making**. This does not mean that all actions taken have been in vain and the company efforts have been wasted. On the contrary, it is observed that labor contractor training and its follow up has started to transform a part of the labor contractors into partners walking on the same path.

It can be concluded that **'Strong Women, Strong Agriculture'** has a unique place among the evaluated intervention areas. Although social compliance topics were integrated into the training modules, **it is perceived that this project primarily concerns the well being of the local community and appreciated for this**. As this perception suggests, the well being of the local community and worker groups are not considered to be correlated. Assessment fatigue coupled with the price uncertainties seems to considerably heighten the tension in Balatlı and Beyören villages in recent years. In this sense, **'Strong Women, Strong Agriculture'** has been welcomed and become very popular in the region as a project specifically targeting women's empowerment. It is seen that time is needed to fully learn and internalize certain social compliance issues and impact targets seem to depend on multiple factors, some of which are outside of women's zone of influence. Thus the project targets are currently in unachieved status. However, it should be also emphasized that the project had short term benefits as the **local community familiarised itself with Balsu's efforts on other fronts and started to look more favorably on them**.



## Recommendations

The evaluation team's recommendations to the companies concerning their efforts in the selected evaluation areas are as below:

1. Continuing to be 'the eyes and ears' of the local authorities in the field to bring attention to noncompliance issues and needs;
2. Continuing to work for mobilization of local authorities and public resources in collaboration with the implementing partners;
3. Working with all harvest actors (workers, labor contractors and garden owners) to transform them into partners in the same boat. It is seen that continuous and consistent work as opposed to one-short interventions, bring fruits to all parties;
4. Continuing to work in the cities or origin of the migrant workers is needed as the harvest is a very short and a busy period to work with the target groups, especially workers. Harvest period activities can be used to refresh learnings and complement what was already done;
5. Concentrating the efforts primarily on consensus areas may be a good strategy to pull all actors in and motivate them to change their behavior, though a balance should be struck and awareness raising work should continue for the other topics;
6. Working closely with the implementing partner to refine the safe space system, as the study findings show that the project has matured and it has momentum. Therefore the next step should be taken to improve the system by:
  - Increasing the coverage in the region and consolidating the existing follow up system to ensure attendance by children who have been reached

## Recommendations

- Putting more effort into monitoring and evaluation – Continuous monitoring and evaluation efforts are key to assess and improve performance and achieve targets. As the program successfully took root in the region, now it is especially time to assess and record the improvements;
- Agreeing on annual targets, sub-targets and specific key performance indicators with the implementing partner – It is seen that certain elements of safe space -- such as the provision of nutritious food and hygiene education -- stand out for Balsu's team. It is recommended to identify common targets and indicators on these subjects to follow the progress.
- Determining transparent criteria for beneficiary selection – It is apparent that as the project takes further root and access to families increases, there will be a need for limiting the number of children admitted to school considering the limitation in resources. Determination and communication of selection criteria would guarantee transparency and prevent the formation of negative feelings among those who are not admitted.
  - ❖ It should be noted that the determination of beneficiary criteria is a key subject for all intervention areas. It is observed that potential beneficiaries have a tendency to approach the issue of distribution of limited resources with suspicion.

The image features a world map in a light gray tone, overlaid with a grid of latitude and longitude lines. A solid dark red horizontal bar is positioned at the top of the page. The text is centered on the map.

# **ANNEX**

## **EVALUATION of MAIN IEM ASSESSMENT AREAS in 2018**

## Summary of IEM Results – 1. Code Awareness (2014 & 2015)

		2014	2015
Code Awareness	<b>GEN 1:</b> Establish and articulate clear, written workplace standards. Formally convey those standards to Company Growers as well as to supply chain Organizers.	Noncompliance	
	<b>GEN 2:</b> 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	
	<b>GEN 3:</b> 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 a security that they shall not be punished or prejudiced for doing so.	Noncompliance	Noncompliance

# Summary of IEM Results – 1. Employment Relationship (2016 & 2017)

		2016	2017
<i>Human Resource Management System</i>	ER.1.1	In compliance	Noncompliance
	ER.2.1 (Progress Benchmark)	Not initiated	In compliance
	ER.2.1.1(PR)	Not initiated	In compliance
<i>Recruitment and Hiring</i>	ER.3.1	Noncompliance	Noncompliance
	ER.3.1.1	Noncompliance	Noncompliance
	ER.3.1.2	Noncompliance	Noncompliance
	ER.4	Noncompliance	Noncompliance
	ER.5.1	Noncompliance	Noncompliance
	ER.5.2	Noncompliance	Noncompliance
	ER.5.3	In compliance	In compliance
	ER.6 (PR)	In progress	In compliance
	ER.7.1	In compliance	In compliance
	ER.7.2	In compliance	In compliance
	ER.7.3	In compliance	In compliance
	ER.7.4	In compliance	In compliance
	ER.7.5	In compliance	In compliance
	ER.7.6	Noncompliance	Noncompliance
	ER.7.7	In compliance	In compliance
ER.7.8	In compliance	In compliance	

		2016	2017	
<i>Terms and Conditions</i>	ER.9.1	Noncompliance	Noncompliance	
	ER.9.2	Noncompliance	Noncompliance	
	ER.9.2.1	Noncompliance	Noncompliance	
	ER.9.2.2	Noncompliance	N/A	
	ER.9.2.3	Noncompliance	Noncompliance	
	ER.9.3	In compliance	In compliance	
	ER.9.3.1	In compliance	In compliance	
	ER.9.3.2	In compliance	In compliance	
	ER.9.3.3	In compliance	In compliance	
	ER.10	In compliance	N/A	
	ER.11	Noncompliance	Noncompliance	
	ER.12.1	Noncompliance	Noncompliance	
	ER.12.1.1	Noncompliance	In compliance	
	ER.12.2	In compliance	N/A	
	ER.13.1	Noncompliance	Noncompliance	
	ER.13.2 (PR)	Not initiated	In progress	
	ER.13.3 (PR)	In progress	In progress	
<i>Administration</i>	ER.15.1	In compliance	In compliance	
	ER.15.2	In compliance	In compliance	
	ER.15.2.1	In compliance	Noncompliance	
	ER.16.1	In compliance	Risk of noncompliance	
	ER.16.2	In compliance	In compliance	
	ER.17.2 (PR)	In progress	In progress	
	ER.17.3 (PR)	In compliance	In compliance	
	ER.17.4 (PR)	Not initiated	In compliance	
	<i>Worker Involvement</i>	ER.18.1	In compliance	In compliance
		ER.18.2 (PR)	Not initiated	In progress
<i>Right to Organize and Bargain</i>	ER.19	In compliance	In compliance	

		2016	2017
<i>Work Rules and Discipline</i>	ER.20.1	Noncompliance	Noncompliance
	ER.20.2	Noncompliance	Noncompliance
	ER.20.3 (PR)	Not Initiated	In progress
	ER.20.4	Noncompliance	Noncompliance
	ER.20.6	Noncompliance	Noncompliance
	ER.20.7	Noncompliance	Noncompliance
	ER.20.8	Noncompliance	Noncompliance
	ER.20.9 (PR)	Not Initiated	Not Initiated
	ER.20.11	Noncompliance	Noncompliance
<i>Access to Training for Family Members</i>	ER.21	Noncompliance	Risk of noncompliance
<i>HSE Management System</i>	ER.24.1.	In compliance	Noncompliance
	ER.24.2 (PR)	In progress	In compliance
	ER.24.3	In compliance	In compliance
	ER.24.4 (PR)	In progress	In compliance
	ER.24.4.1 (PR)	In progress	In compliance
	ER.24.4.2 (PR)	Not Initiated	In compliance
	ER.24.4.3 (PR)	Not Initiated	In compliance
	ER.24.4.4 (PR)	Not Initiated	In compliance
	ER.24.4.5 (PR)	Not Initiated	In compliance
ER.24.4.6 (PR)	Not Initiated	In compliance	
ER.24.5 (PR)	Not Initiated	In compliance	
<i>Grievance Procedures</i>	ER.25.1 (PR)	In progress	In compliance
	ER.25.2 (PR)	In progress	In progress
	ER.25.3	In compliance	In compliance
	ER.25.4	In compliance	In compliance

# Common Non Compliance Areas Through the Years

## FLA BENCHMARKS 'NON-COMPLIANCE' AREAS (2014 - 2017)

	<b>Human Resource Management System - Benchmarks</b>
ER.1.1	Employer shall have written terms and conditions of employment, job descriptions, rules of compensation, and working hours for all positions. In the case of workplaces with informal labor structures, employers should be able to describe verbally all of the above terms and conditions and clearly communicate them to workers.
	<b>Proof of Age Documentation</b>
ER.3.1	Employers shall verify proof of age documentation for all young workers on the farm at the time of their employment and work towards collecting and maintaining all documentation necessary to confirm and verify the date of birth of all workers, including long term and casual workers.
ER.3.1.1	Employers shall take reasonable measures to ensure such documentation is complete and accurate.
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.
	<b>Employment Agency / Labor Contractors</b>
ER.4	Employers shall not use employment agencies/labor contractors that rely on any practice that is linked to using false information to recruit workers; restricting workers' freedom of movement; requiring workers to pay recruitment and/or employment fees; withholding from workers a copy of their employment contract in their native language that sets forth the general terms and conditions of engagement and employment; retaining possession or control of workers identification and other documents like passports, identity papers, work permits, and other personal legal documents; punishing workers for terminating employment.
ER.5.1	No worker hired by an employment agency or a labor contractor shall be compensated below the legal minimum wage. The same rights as provided for directly hired contract workers apply for workers hired via an employment agency or labor intermediary.
ER.5.2	Fees associated with the employment of workers shall be the sole responsibility of employers. No worker hired via an employment agency or a labor contractor shall pay a fee or get a reduction by applying a fee over his salary.
	<b>Use of Contract, Temporary, Casual, Daily, Seasonal or Migrant Workers</b>
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;
	<b>Employment Terms</b>
ER.9.1	Workers should be made aware of the employment terms under which they are engaged.
ER.9.2	Employment terms shall be those to which the worker has voluntarily agreed, provided those terms do not fall below:
ER.9.2.1	provisions of national laws;
ER.9.2.2	freely negotiated and valid collective bargaining agreements; or
ER.9.2.3	the FLA Workplace Code.

## Common Non Compliance Areas Through the Years

### FLA BENCHMARKS 'NON-COMPLIANCE' AREAS (2014 - 2017)

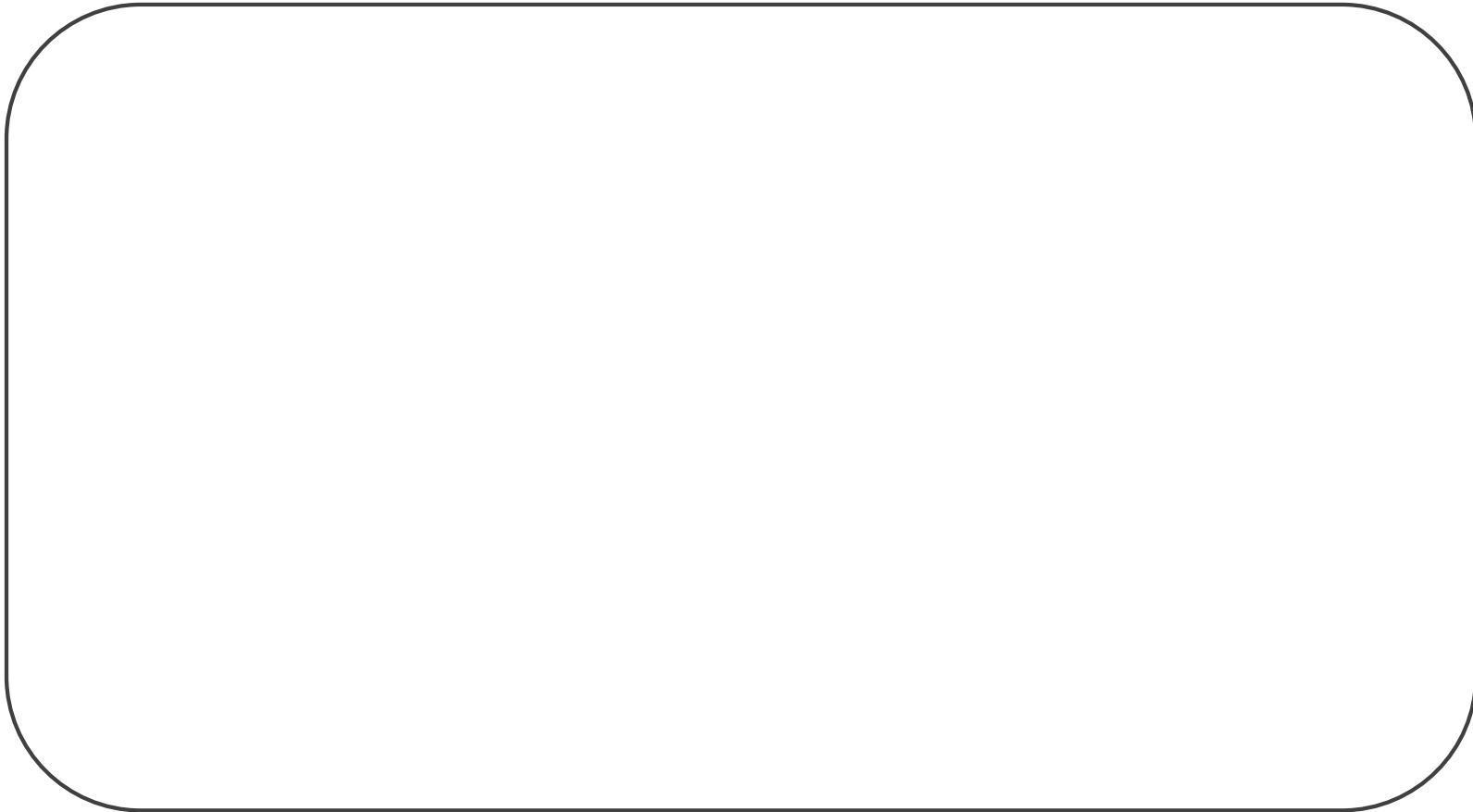
	<b>Special Categories of Workers</b>
ER.11	Employers shall ensure that all legally mandated requirements for the protection or management of special categories of workers, including migrant, juvenile, contract/contingent/temporary, casual, daily, home workers, pregnant or disabled workers are implemented.
	<b>Communication</b>
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 posting 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.
ER.12.1.1	Employers shall inform workers that any form of harassment or abuse in the workplace shall be subject to disciplinary measures.
	<b>Supervisor Training</b>
ER.13.1	Farmer, labor contractor or any kind of supervisor who is leading workers shall have knowledge of the local labor laws and the FLA Code.
	<b>Wage Advances</b>
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).
	<b>HSE Management System - Benchmarks</b>
ER.24.1.	Health, safety and environmental rules shall be communicated to all workers in the local language or language spoken by workers if different from the local language.

## General Picture in 2018 – Employment Relationships

- Balsu's efforts are especially visible with respect to **'Communication'** and **'Worker Involvement'** issues. Most workers received training sessions during which they were informed about working hours, wages and OHS measures (*please see 'Workers Training Evaluation' section for more information*). Balsu also separately delivered training sessions for female farmers and farmer wives too (*please see 'Strong Women, Strong Agriculture Evaluation' section for more information*).
- Meanwhile, it is noted that some of the key non-compliance issues of 2014-2017 FLA IEMs (especially issues related to **'Human Resource Management System'**, **'Employment Agency/labor Contractors'** and **'Employment Terms'**) remain to be problem areas:
  - None of the workers received information about terms and conditions of their work before leaving their city of origin; they have been informed about these subjects upon their arrival either by their labor supervisor or the Balsu team.
  - None was working under contractual agreement in the worker groups visited. Verbal agreements were made between the garden owners and labor contractors before the beginning of the season and labor contractors made verbal agreements with workers covering tasks and accommodation details. The interviewed workers did not know the exact money they would be paid in 2018 since it was not announced by the local commission at the time of the interviews. It should be noted that most workers have Harvest experience from past years and they state that they are already familiar with locally accepted working hours and wage calculation method.
  - 68% of workers (those working for labor contractors) interviewed in the gardens pay 10% from their wages to the intermediaries.
- An issue particularly worth mentioning under this heading is **'Grievance Procedures'**, which is an area that came to the forefront especially in last 2 years. Even though a free company hotline is operational and communicated to the workers during the trainings, workers primarily contact intermediaries to handle grievances. Accordingly, the recall rate of **'Grievance Procedures'** as a training topic is very low (14% recalls it).



*Balsu CAP – Employment Relationships*



## Summary of IEM Results – 2. Forced labor

	2014	2015
<i>F.1 General Compliance Forced Labor</i>		
<i>F.2 Freedom in Employment</i>		
<i>F.3 Employment Terms/Voluntary Agreement</i>		
<i>F.4 Employment Terms/Prohibitions</i>	Noncompliance	
<i>F.5 Debt/Bonded Labor</i>		
<i>F.6 Wage Advances</i>		
<i>F.7 Free Disposal of Wages/Cash and In-Kind Compensation</i>		
<i>F.8 Recruitment through Referrals</i>		
<i>F.9 Freedom of Movement</i>		
<i>F.10 Grower-Controlled Living Quarters</i>		
<i>F.11 Worker Ability to Terminate-Freedom of Movement</i>		
<i>F.12 Individual Contracts (Verbal / Written)</i>		
<i>F.13 Personal Worker Identification and Other Documents</i>		
<i>F.14 Bonded Labor</i>		

		2016	2017
<i>General Compliance</i>	F.1	In compliance	In compliance
<i>Freedom in employment and movement</i>	F.2	In compliance	Risk of noncompliance
	F.3	In compliance	In compliance
	F.4.1	In compliance	N/A
	F.4.2	In compliance	In compliance
	F.5.3	In compliance	In compliance
	F.7.1	In compliance	In compliance
	F.7.2	In compliance	In compliance
	F.7.3	In compliance	In compliance
	F.7.4	In compliance	In compliance
	F.7.5	In compliance	In compliance
	F.7.6	In compliance	In compliance
	F.7.7	In compliance	In compliance
	F.8	In compliance	Noncompliance
<i>Work of Family Members</i>	F.6.1	In compliance	In compliance
	F.6.2	In compliance	In compliance
	F.6.3	Noncompliance	Noncompliance
	F.6.4	In compliance	In compliance
<i>Personal Workers Identification and Other Documents</i>	F.9	In compliance	In compliance

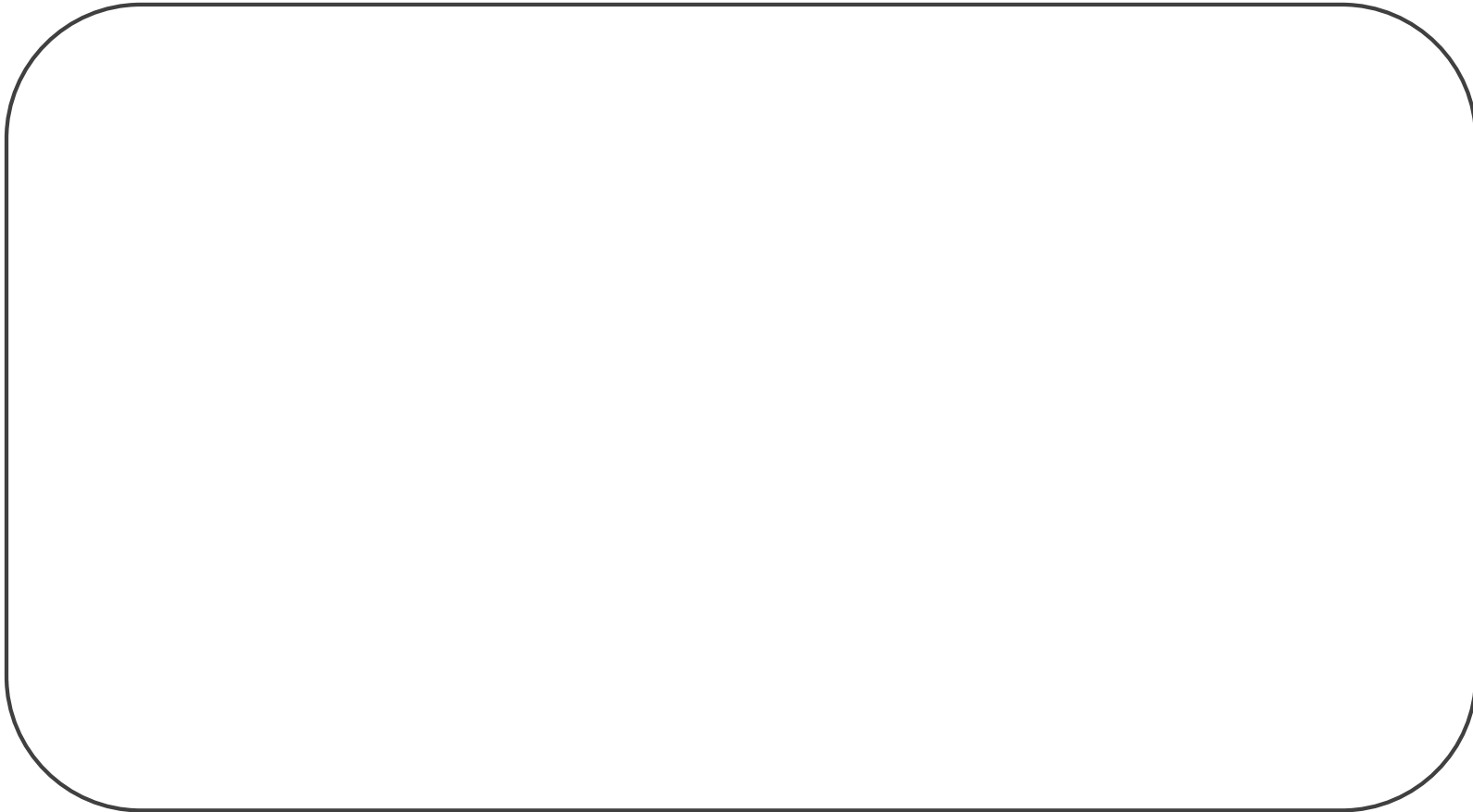
## Common Non Compliance Areas Through the Years

<b>FLA BENCHMARKS 'NON-COMPLIANCE' AREAS (2014 - 2017)</b>		<b>Employment Terms/Prohibitions</b>
	<b>F.4</b>	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 specify that workers can be confined or be subjected to restrictions on freedom of movement; allow growers to hold wages already earned; provide for penalties resulting in paying back wages already earned; or, in any way punish workers for terminating employment.
		<b>Freedom in Employment and Movement</b>
	<b>F.8</b>	The imposition of overtime where workers are unable to leave the work premises constitutes forced labor.
		<b>Work of Family Members</b>
	<b>F.6.3</b>	If more than one member from the same family/household is hired by the employer/producer on the same farm, each one should have a separate contract with no linkage to other members.

## General Picture in 2018

- While none of the workers interviewed complained about forced labor, it has been observed that some forced labor-related risks are present. Per the accounts of the interviewed workers, workers have the right to terminate their employment freely from the garden owner's side. However, it is also observed that they are dependent on the labor contractor and the rest of the group for their transportation back home. This **limitation of movement** poses a risk of non-compliance since the workers may feel that they have no choice but to complete the work.
- Furthermore, all workers expressed that they are **paid at the end of the harvest**. This could mean that they are effectively compelled to stay for the entire harvest in order to collect their wages.
- Workers from the same family do not have individual agreements and do not receive separate payment. **The farmers pay the wages in total for all workers to labor contractors and labor contractors pay to the head of the family.**

*Balsu CAP – Forced Labor*



## Summary of IEM Results – 3. Child labor

	2014	2015
<i>CL.1 General Compliance Child Labor</i>		
<i>CL.2 Child Labor</i>	Noncompliance	Noncompliance
<i>CL.3 Proof of Age Documentation</i>	Noncompliance	Noncompliance
<i>CL.4 Other Means of Age Verification</i>		
<i>CL.5 Government Permits and Parental Consent Documentation</i>	Noncompliance	Noncompliance
<i>CL.6 Employment of Young Workers</i>	Noncompliance	Noncompliance
<i>CL.7 Hazardous Work for Young Workers</i>	Noncompliance	
<i>CL.8 Education of Young Workers</i>		
<i>CL.9 Children on Premises</i>		
<i>CL.10 Removal and Rehabilitation of Child Laborers</i>	Noncompliance	

		2016	2017
<i>General Compliance</i>	CL.1	Noncompliance	Noncompliance
<i>Minimum Age</i>	CL.2	Noncompliance	Noncompliance
<i>Immediate family members</i>	CL.3	In compliance	In compliance
<i>Right to education</i>	CL.4.1 (PR)	In progress	In progress
<i>Young Workers</i>	CL.5	Noncompliance	In compliance
	CL.6.1	Noncompliance	Noncompliance
	CL.6.2	Noncompliance	Noncompliance
	CL.7	Noncompliance	Noncompliance
<i>Apprenticeships and Vocational Training</i>	CL.8.1 (PR)	Not initiated	N/A
	CL.8.2 (PR)	Not initiated	N/A
<i>Children on Premises</i>	CL.9	In compliance	Noncompliance
<i>Removal and Rehabilitation of Child Laborers</i>	CL.10.1	Noncompliance	Noncompliance
	CL.10.2 (PR)	In progress	In progress

# Common Non Compliance Areas Through the Years

## Young Workers Specific

<b>FLA BENCHMARKS 'NON-COMPLIANCE' AREAS (2014 - 2017)</b>		<b>Young Workers - Benchmarks</b>
	CL.5	Employers shall abide by all relevant rules and procedures where the law requires government permits or permission from parents as a condition of employment of young workers.
		<b>Employment of Young Workers</b>
	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.
	CL.6.2	Employers shall maintain a list of all young workers, their entry dates, proof of age and description of their assignment.
		<b>Hazardous Work for Young Workers</b>
	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. Such work includes, but is not limited to, the application of agricultural 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. Every activity performed by a young worker must be supervised by an adult.

## Child labor Specific

<b>FLA BENCHMARKS 'NON-COMPLIANCE' AREAS (2014 - 2017)</b>		<b>General Compliance - Benchmarks</b>
	CL.1	Employers shall comply with all national laws, ratified international conventions, fundamental labor rights, regulations, and procedures concerning the prohibition of child labor.
		<b>Minimum Age - Benchmarks</b>
	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.
		<b>Children on Premises - Benchmarks</b>
	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.
		<b>Removal and Rehabilitation of Child Laborers - Benchmarks</b>
CL.10.1	If a child laborer is found working on a farm, all relevant downstream suppliers, including the participating company, shall immediately assess the situation at the child's household level and shall engage with relevant stakeholders to find a sustainable remediation solution that is in the best interest of the child.	

## General Picture in 2018 - Child labor

- According to the 2014 IEM findings, children constituted 19% of the labor force in Balatlı & Beyören villages. This rate signaled a dire need for action in this area and steps have been taken since. Data shows that efforts were fruitful since there is **a clear decline in child labor rates across the years.**
- The evaluation team's observations in the field and collected data show that **safe spaces play a key role in the decline of child labor.** Also IEM results show that laborious efforts have been taking place in this field as 'Right to Education' and 'Removal and Rehabilitation of Child laborers' sub-benchmarks are marked as progress areas in the last years.
- Balsu supported 3 school projects in 2018 with (1 with ILO and 2 with GHF); the evaluation study focused on GHF School in Beyören. According to observations, Balsu and GHF teams worked in close collaboration to reach families, children and to register them to safe spaces in 2018. Safe space awareness levels and children's account show that the teams were able to reach a considerable part of the worker groups in these villages. High access rate is a sign of a functioning and active safe space.
- The access to education rate is not meaningful by itself; attendance rates should be closely followed too. Event though the rate was lowest of the last years, the evaluation team still **came across working children in the gardens in 2018.** These children were contacted by GHF and Balsu teams but they could not be persuaded to cease working due to different reasons. It should be noted that **Balsu and GHF teams have mainly the power of persuasion in their hands. If this tool does not work, they are unable to keep children away from the gardens.**



## General Picture in 2018 - Young Workers' Working Conditions

- Taking the increased rate of young workers in the labor force into account (*please see Slide 21*), working conditions of young workers stand out as a hot topic. For the last 4 years (2014-2017), the employment of young workers was regularly marked as an area of non-compliance by the FLA audits. 2 main issues stand out through the years; **young workers work an excessive number of hours (more than 60 hours in a week and for 7 days) and under the same conditions as adults, performing the same hazardous and strenuous tasks.**
- During the fieldwork, it has been detected that **working an excessive number of hours remains a persistent problem for young workers.** On the other hand, it is also observed that this is an issue **closely intertwined with poverty and cultural dependencies** which are mostly out of companies' zone of influence. Young workers see themselves as adults who carry certain responsibilities to their families; they are either working for the economic survival of their family or to earn money for their school expenses. They have a responsibility to their group as well. If they work less, they will earn less and other workers will have to work more to finish the work on time, which will create disharmony in the group.
- As for the hazardous and strenuous tasks, the evaluation team detected that in out of 24 young workers, **2 were undertaking tasks which can be classified as hazardous** (carrying hazelnut sacks). On the other hand, it should be noted that **all young workers stated that they received Occupational Health & Safety (OHS) training by Balsu's team and they were well informed about tasks they should not carry out or should be careful with.**

*Balsu CAP – Child Labor*



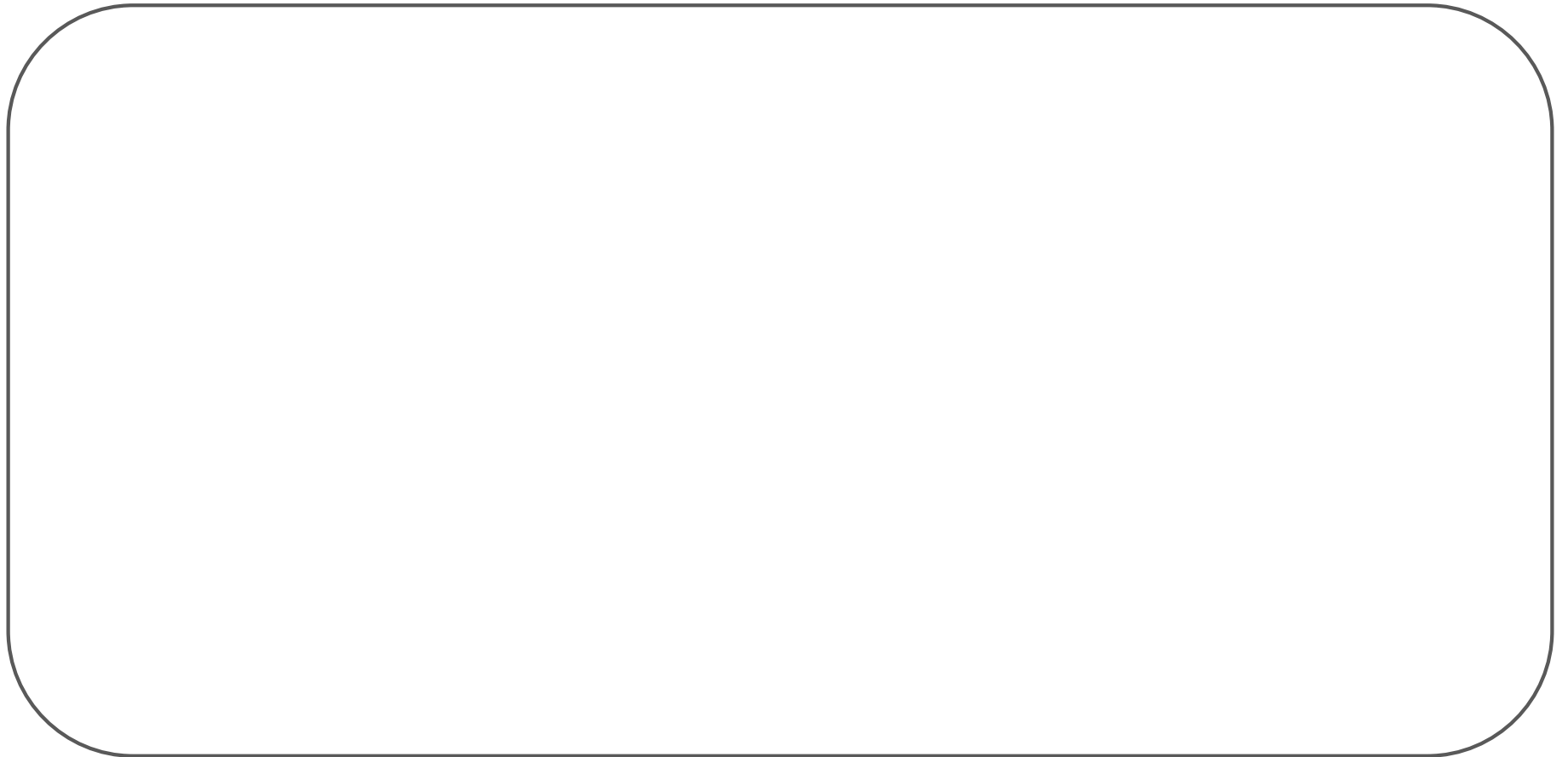
## Summary of IEM Results – 4. Harassment or Abuse

	2014	2015
H&A.1 General Compliance Harassment and Abuse		
H&A.2 Discipline/Fair and Non-discriminatory Application		
H&A.3 Discipline/Worker Awareness	Noncompliance	Noncompliance
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	

		2016	2017
<i>General Compliance</i>	H/A.1.1	In compliance	In compliance
	H/A.1.2	In compliance	In compliance
<i>Discipline</i>	H/A.2	In compliance	In compliance
	H/A.3	In compliance	In compliance
	H/A.4	In compliance	In compliance
	H/A.5	Non compliance	In compliance
	H/A.6	In compliance	In compliance
	H/A.7	In compliance	In compliance
	H/A.13	In compliance	In compliance
<i>Violence</i>	H/A.8.1	In compliance	In compliance
	H/A.8.2	In compliance	In compliance
	H/A.8.3	In compliance	In compliance
<i>Sexual Harassment</i>	H/A.9.1	In compliance	In compliance
	H/A.9.2	In compliance	In compliance
	H/A.9.3	In compliance	In compliance
	H/A.9.4	In compliance	In compliance
<i>Security Practices</i>	H/A.10	In compliance	In compliance
	H/A.10.1	In compliance	In compliance
	H/A.10.2	In compliance	In compliance

**Discipline procedures stand out as the main problem area over the years. Since the evaluation team did not collect data on this specific issue, this report does not evaluate this area.**

*Balsu CAP – Harassment or Abuse*



## Summary of IEM Results – 5. Nondiscrimination

	2014	2015
D.1 General Compliance Non-Discrimination	Noncompliance	Noncompliance
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		

		2016	2017
<i>General Compliance</i>	ND. 1	In compliance	Noncompliance
<i>Recruitment and Employment Practices</i>	ND.2.1	In compliance	In compliance
	ND.2.3	In compliance	In compliance
<i>Compensation Discrimination</i>	ND. 3	Risk of Noncompliance	Noncompliance
<i>Discrimination in Training and Communication</i>	ND. 4	In compliance	In compliance
<i>Marital or Pregnancy-Related Discrimination</i>	ND.5.1	In compliance	In compliance
	ND.5.2	In compliance	In compliance
	ND.5.3	In compliance	In compliance
	ND.6.1	In compliance	In compliance
	ND.6.1.1	In compliance	In compliance
<i>Health-Related Discrimination</i>	ND. 7	In compliance	In compliance
	ND.8	In compliance	In compliance
	ND. 9	In compliance	In compliance
<i>Respect of Culture and Religion</i>	ND.11	In compliance	In compliance

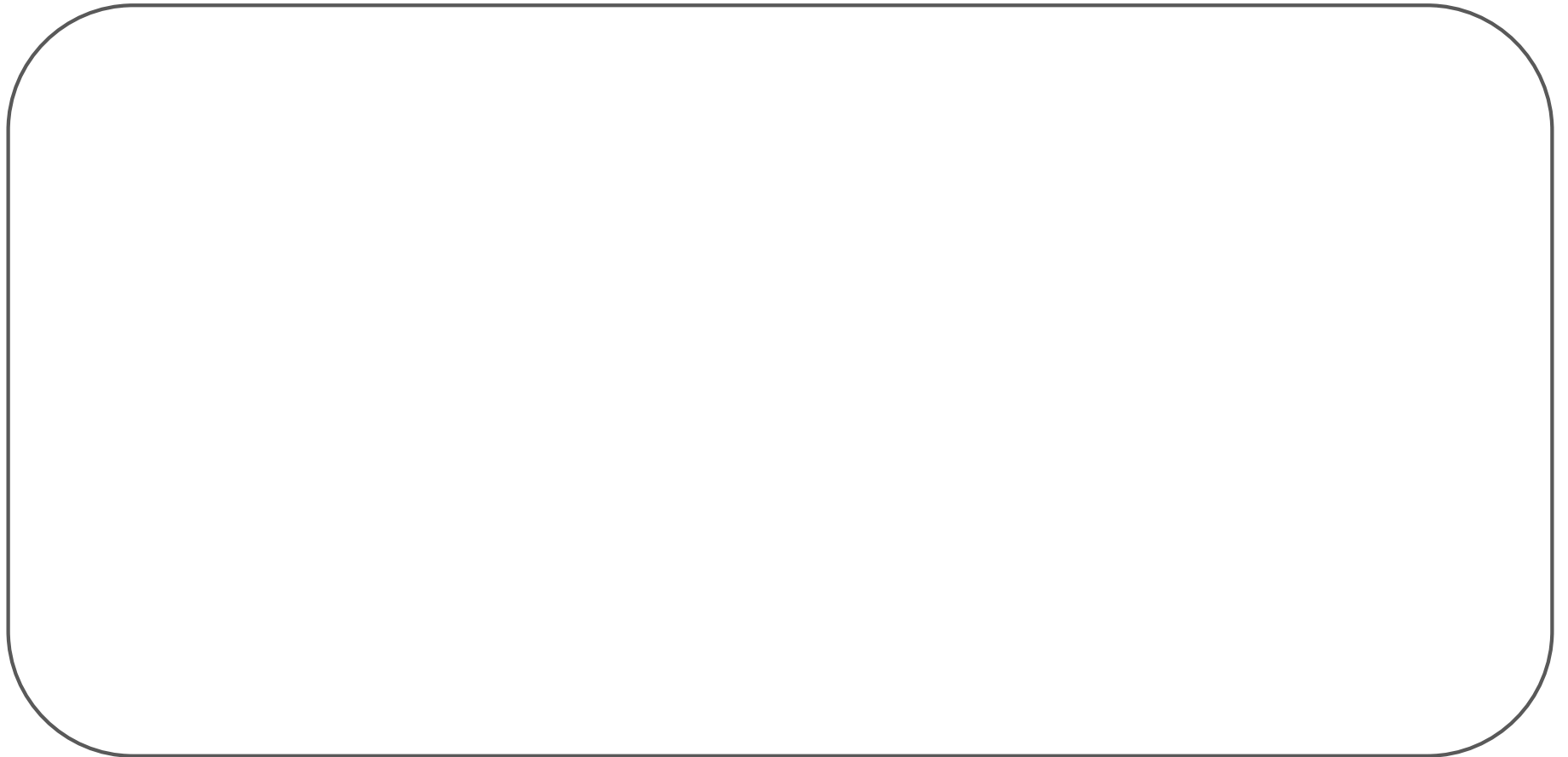
## Common Non Compliance Areas Through the Years

FLA BENCHMARKS 'NON-COMPLIANCE' AREAS (2014 - 2017)	General Compliance - Benchmarks	
	ND. 1	Employers shall comply with all national laws, regulations, and procedures concerning nondiscrimination.
	ND. 3	There shall be no differences in compensation for workers performing equal work or work of equal value on the basis of gender, race, religion, age, disability, sexual orientation, nationality, political opinion, social group, ethnic origin, employment status (e.g. local workers vs. migrant workers), or membership in unions or other workers' representative bodies.

## General Picture in 2018

- According to the interviewed members of the local community and seasonal migrant workers' accounts, **compensation discrimination** is a persisting problem in the region. While seasonal workers' wage was expected to be around 67.5TL in 2018 (in the absence of deduction), local workers were expected to earn between 70-80TL per day.
- The garden owners argue that local workers are more knowledgeable about hazelnut picking and they provide high-quality work in a shorter time (also they do not need the provision of accommodation); thus the wage difference is perceived to be justified. However, the evaluation team did not come across any hard evidence that would support the high-quality work by local workers claim.
- It should be noted that 2018 Balsu internal audit findings show that **no local workers were employed in Beyören and Balatlı, thus compensation discrimination based on local v. migrant workers was not an issue** for these villages.

## *Balsu CAP – Non Discrimination*





## Summary of IEM Results – 6. Health and Safety (2014 & 2015)

	2014	2015
H&S.1 General Compliance Health and Safety	Noncompliance	Noncompliance
H&S.2 Document Maintenance/Worker Accessibility and Awareness	Noncompliance	
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	
H&S.7 Personal Protective Equipment		
H&S.8 Chemical Management and Training		
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		
H&S.14 Rest Areas		
H&S.15 Living Quarters	Noncompliance	Noncompliance

## Summary of IEM Results – 6. Health, Safety and Environment (2016-2017)

		2016	2017
<i>General Compliance</i>	HSE.1.	Risk of noncompliance	Noncompliance
<i>Documents, Permits and Certificates</i>	HSE.2 (PR)	In progress	In progress
	HSE.3.1	In compliance	In compliance
	HSE.4 (PR)	In progress	In progress
<i>Evacuation Requirements and Procedure</i>	HSE.5.1 (PR)	Not Initiated	Not Initiated
	HSE.5.2	Noncompliance	In compliance
<i>Safety Equipment and First Aid</i>	HSE.6.1 (PR)	In progress	In progress
	HSE.6.2 (PR)	Not Initiated	Not Initiated
	HSE.16.3 (PR)	Not Initiated	In progress
<i>Personal Protective Equipment</i>	HSE.7 (PR)	In progress	In progress
	HSE.8	In compliance	In compliance
<i>Chemical Management</i>	HSE.9.1	In compliance	In compliance
	HSE.9.2	Noncompliance	Noncompliance
	HSE.9.2.1	Noncompliance	In compliance
	HSE.10	In compliance	In compliance
	HSE.11.1	In compliance	In compliance
	HSE.11.2	Not Initiated	Not Initiated

		2016	2017
<i>Protection Reproductive Health</i>	HSE.12.1	In compliance	In compliance
	HSE.12.2 (PR)	Not Initiated	In compliance
<i>Infrastructure</i>	HSE.13 (PR)	In compliance	N/A
	HSE.17.1	In compliance	In compliance
	HSE.17.2 (PR)	Not Initiated	In progress
	HSE.19 (PR)	In progress	In progress
	HSE.21 (PR)	In progress	In progress
	HSE.22 (PR)	Not Initiated	Not Initiated
<i>Machinery Safety</i>	HSE.14.1	In compliance	In compliance
	HSE.14.2	In compliance	In compliance
	HSE.14.3	In compliance	In compliance
	HSE.14.4	In compliance	In compliance
<i>Ergonomics and Medical Facilities</i>	HSE.15.2 (PR)	In progress	In progress
	HSE.16.1	In progress	In compliance
	HSE.16.2	Risk of noncompliance	Noncompliance

## Common Non Compliance Areas Through the Years

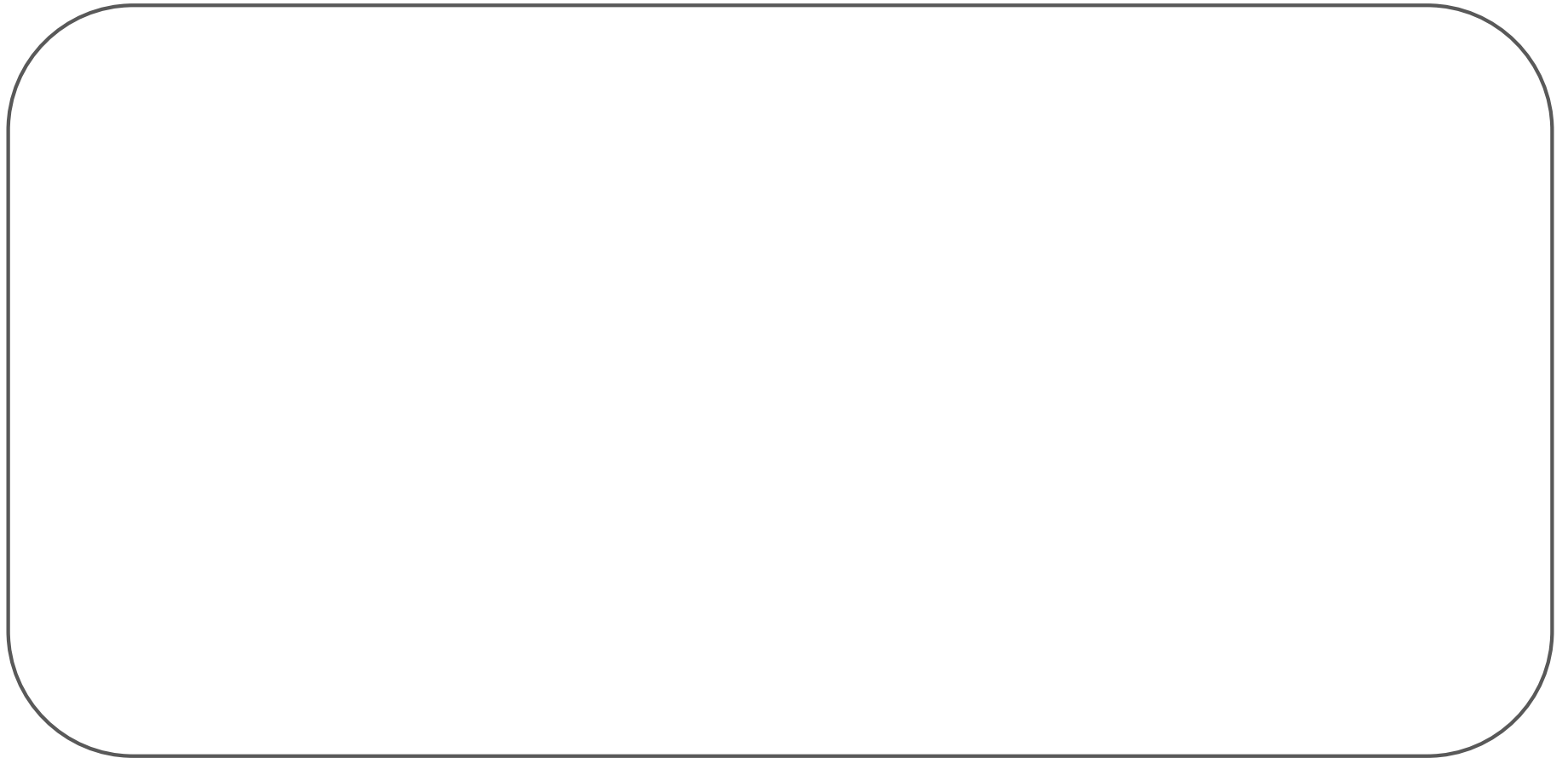
### FLA BENCHMARKS 'NON-COMPLIANCE' AREAS (2014 - 2017)

	<b>General Compliance - Benchmarks</b>
HSE.1.	Employers shall comply with all national laws, regulations, and procedures concerning health, safety, and the environment.
	<b>Access to Water and Sanitation</b>
HSE.17.1	Safe and clean potable water for drinking shall be freely available at all times, within a 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.

## General Picture in 2018

- Although **dangerous transport on tractors and accommodation conditions continue to be problematic**, it is also seen that Balsu has been taking steps in sub-areas in which the company has room for action. These areas are as below:
  - **Safety Equipment and First Aid** distribution – Also there is strong emphasis on OHS related issues during worker training sessions (please see ‘Workers Training Evaluation’ section for more information).
  - **Infrastructure** – Even though workers continue to complain about sanitation facilities in the gardens and points of accommodation, it is seen that Balsu is trying to solve this problem by placing mobile toilets in selected gardens. Those who are perceived to be ‘model garden owners’ and whose gardens are in central locations (so that worker groups in other gardens can use the facilities as well) are provided with mobile toilets. It is seen that actions in this area should be handled with care as there are two different angles to the issue:
    - Mobile toilet distribution has potential to be a hook for compliance. A considerable number of garden owners are planning to make requests from Balsu and they are willing to be cooperative in social compliance issues.
    - Relatively few garden owners received these facilities so far and some garden owners question the criteria for this resource allocation.

*Balsu CAP – Health, Safety and Environment*



## Summary of IEM Results – 8. Hours of Work

	2014	2015
<i>HOW.1 General Compliance Hours of Work</i>	Noncompliance	Noncompliance
<i>HOW.2 Rest Day</i>	Noncompliance	
<i>HOW.3 Meal and Rest Breaks</i>		
<i>HOW.4 Overtime</i>		
<i>HOW.5 Over Time/Positive Incentives</i>		
<i>HOW.6 Public Holidays</i>		

		2016	2017
<i>General Compliance</i>	HOW.1.1	Noncompliance	Noncompliance
	HOW.1.2	Noncompliance	Noncompliance
	HOW.1.3	Noncompliance	Noncompliance
	HOW.1.4	Noncompliance	Noncompliance
<i>Rest Day</i>	HOW.2	In compliance	In compliance
<i>Meal and Rest Breaks</i>	HOW.3	In compliance	In compliance
<i>Protected Workers</i>	HOW.4.1	Noncompliance	Noncompliance
	HOW.4.2 (PR)	Not initiated	In progress
	HOW.4.3	In compliance	In compliance
<i>Overtime</i>	HOW.5.1	Noncompliance	Noncompliance
	HOW.5.2	Noncompliance	Noncompliance
	HOW.6.1	Noncompliance	Noncompliance
	HOW.6.2	Noncompliance	Noncompliance
	HOW.6.3 (PR)	Not initiated	In progress
	HOW.7	Noncompliance	Noncompliance
	<i>Public Holidays and Leave</i>	HOW.8.1	In compliance
HOW.8.2		In compliance	In compliance
HOW.9		In compliance	N/A
HOW.10.1		In compliance	N/A
HOW.11 (PR)		In compliance	N/A
HOW.12.1 (PR)		In compliance	N/A
HOW.12.2 (PR)		In compliance	N/A
HOW.13		In compliance	In compliance
HOW.14		In compliance	In compliance
HOW.15 (PR)		In compliance	N/A
HOW.16 (PR)	In compliance	N/A	

# Common Non Compliance Areas Through the Years

## FLA BENCHMARKS 'NON-COMPLIANCE' AREAS (2014 - 2017)

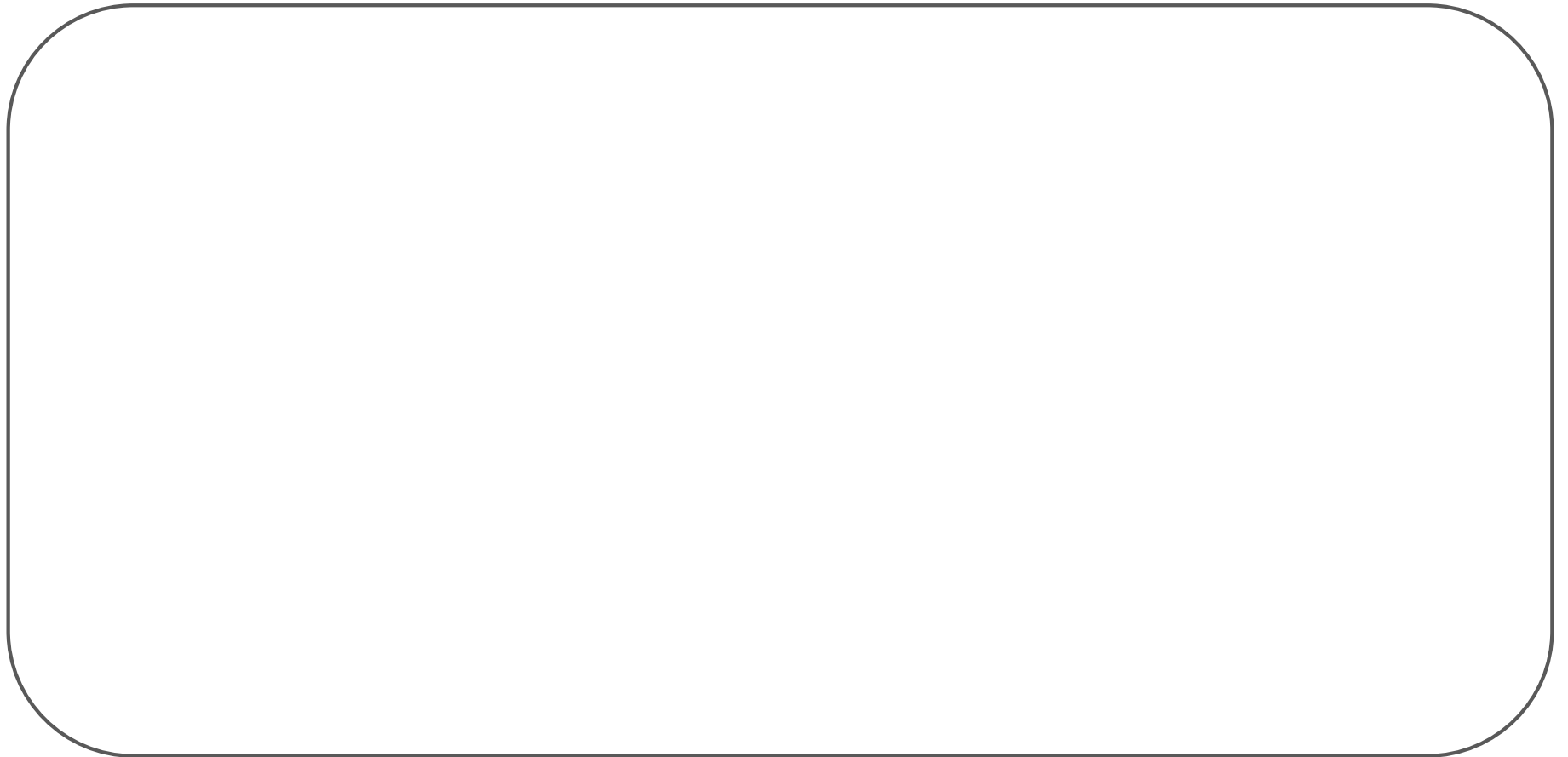
<b>General Compliance - Benchmarks</b>	
HOW.1.1	Employers shall comply with all national laws, regulations, and procedures concerning hours of work, public holidays and leave.
HOW.1.2	In countries where local law does not set out hours of work specific to the agriculture sector, the participating company shall consult with local stakeholders representing the employers (farmers), workers and civil society to define the hours of work. As a general principle, the total hours of work: (1) shall not exceed the number of work hours freely (individually and/or collectively) agreed upon by workers, including that all overtime work is consensual; (2) shall not adversely affect workers' physical and mental health; (3) shall allow for adequate breaks and rest periods during a working day, as determined by the workers, including at least 24 consecutive hours of rest in every seven-day period; and (4) shall be fully compensated according to legal requirements or worker agreements, whichever is more favorable to workers.
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.
HOW.1.4	When workers' accommodations and transport is organized by the employer, or when workers are transported from one site to another during a working day, travel time to the field shall be part of working time calculation.
<b>Rest Day</b>	
HOW.2	Workers shall be entitled to at least one day off in every seven-day period. In case workers have to work for several days without a day off due to the requirement of the production cycle, they can do so as far as they voluntarily agree to it.
<b>Protected Workers - Benchmarks</b>	
HOW.4.1	The workplace shall comply with all applicable laws governing work hours regulating or limiting the nature, frequency, and volume of work performed by pregnant or nursing women or young workers.
<b>Overtime - Benchmarks</b>	
HOW.5.1	Where national laws, regulations, and procedures allow it, employers may calculate regular hours of work as an average over a period of longer than one week, provided all formal and procedural requirements attached to such calculation are met (for instance, obtaining official permission from the relevant authorities or observing limits to the period during which such calculations can be made). However, for the purpose of overtime calculation, regular hours of work may not exceed 48 hours per week, irrespective of whether national law provides or not a limitation.
HOW.5.2	Payment of overtime rates is unaffected by a calculation that spreads total hours over more than one week.
<b>Forced Overtime/Exceptional Circumstances</b>	
HOW.6.1	Employers shall not require workers to work more than the overtime hours allowed by the law of the country where the workers are employed.
HOW.6.2	All overtime work shall be voluntary.
<b>Exceptional Circumstance/Overtime Explanation</b>	
HOW.7	Employers shall be able to provide an explanation for all periods when the exceptional circumstances exception has been used. Clear communication and consultation will be held with workers and any extended hours of work will be levied upon obtaining (verbal/written) consensus from the workers.

## *General Picture in 2018*

- **Excessive hours of work/overtime** remained as a major problem in 2018 too. All seasonal migrant workers (including young workers) spend 12 hours in the gardens (7am-7pm), **without having a rest day** (except occasional rainy days and the first day of the Eid Holiday) from the beginning to the end of the season. Workers want to work consecutive days without a break to earn as much as possible, because they do not have paid rest days.
- Their net daily working time is calculated as 10,5 hours when lunch and mid-day breaks are excluded. Garden owners state that these hours are announced by the Local Commission (thus they are convinced that they are not breaking the law) but these hours are above the usual legal working hours and the FLA Code. The length of working hours is the common complaint source of all workers and they demand change in this subject.



## *Balsu CAP – Hours of Work*



## Summary of IEM Results – 9. Wages, Benefits and Overtime Compensation (2014 & 2015)

	2014	2015
<i>WBOT.1 General Compliance Wages, Benefits and Overtime Compensation</i>	Noncompliance	
<i>WBOT.2 Minimum Wage</i>	Noncompliance	Noncompliance
<i>WBOT.3 Timely Payment of Wages</i>	Noncompliance	
<i>WBOT.4 In-kind Compensation</i>		
<i>WBOT.5 Advance Payments</i>		
<i>WBOT.6 Worker Wage Awareness</i>	Noncompliance	Noncompliance
<i>WBOT.7 Record Maintenance</i>		Noncompliance
<i>WBOT.8 Employer Provided Services</i>		
<i>WBOT.9 Additional Benefits</i>		

## Summary of IEM Results – 9. Compensation (2016 & 2017)

		2016	2017
General Compliance	C.1.1	In compliance	In compliance
	C.1.2	In compliance	Noncompliance
	C.1.3	Noncompliance	In compliance
	C.1.4 (PR)	Not initiated	In progress
Minimum Wage/Fair Compensation	C.2.1	Noncompliance	Noncompliance
	C.2.2	In compliance	In compliance
	C.2.3	In compliance	In compliance
	C.2.4 (PR)		In compliance
	C.2.5 (PR)	Not initiated	In progress
	C.2.6 (PR)	Not initiated	In progress
	C.3	In compliance	N/A
Farmer/Producer Income	C.4 (PR)	In compliance	In progress
Wage Payment and Calculation	C.6	Risk of noncompliance	In compliance
	C.7.1	In compliance	In compliance
	C.7.2	Noncompliance	Noncompliance
	C.7.3 (PR)	Not Initiated	In progress
	C.7.4	Not Initiated	Not Initiated
	C.7.5	Noncompliance	Noncompliance
	C.8.1	Noncompliance	Noncompliance
	C.8.2	In compliance	Noncompliance
	C.8.3	In compliance	Noncompliance
	C.8.4 (PR)	In compliance	Not Initiated
	C.9 (PR)	In compliance	N/A
	C.10.1	In compliance	N/A
	C.10.1.1	In compliance	N/A
C.10.2	In compliance	N/A	
C.10.3	In compliance	N/A	

		2016	2017
Workers Awareness	C.11.1.1	In compliance	Noncompliance
	C.11.1.2	In compliance	N/A
	C.11.1.3	In compliance	In compliance
	C.11.1.4	Noncompliance	N/A
	C.11.1.5	In compliance	Noncompliance
	C.13 (PR)	Not initiated	In compliance
Fringe Benefits	C.12.1	In compliance	In compliance
	C.12.2 (PR)	Not initiated	Not Initiated
	C.12.3	In compliance	In compliance
	C.12.4	In compliance	In compliance
	C.12.5	In compliance	N/A

# Common Non Compliance Areas Through the Years

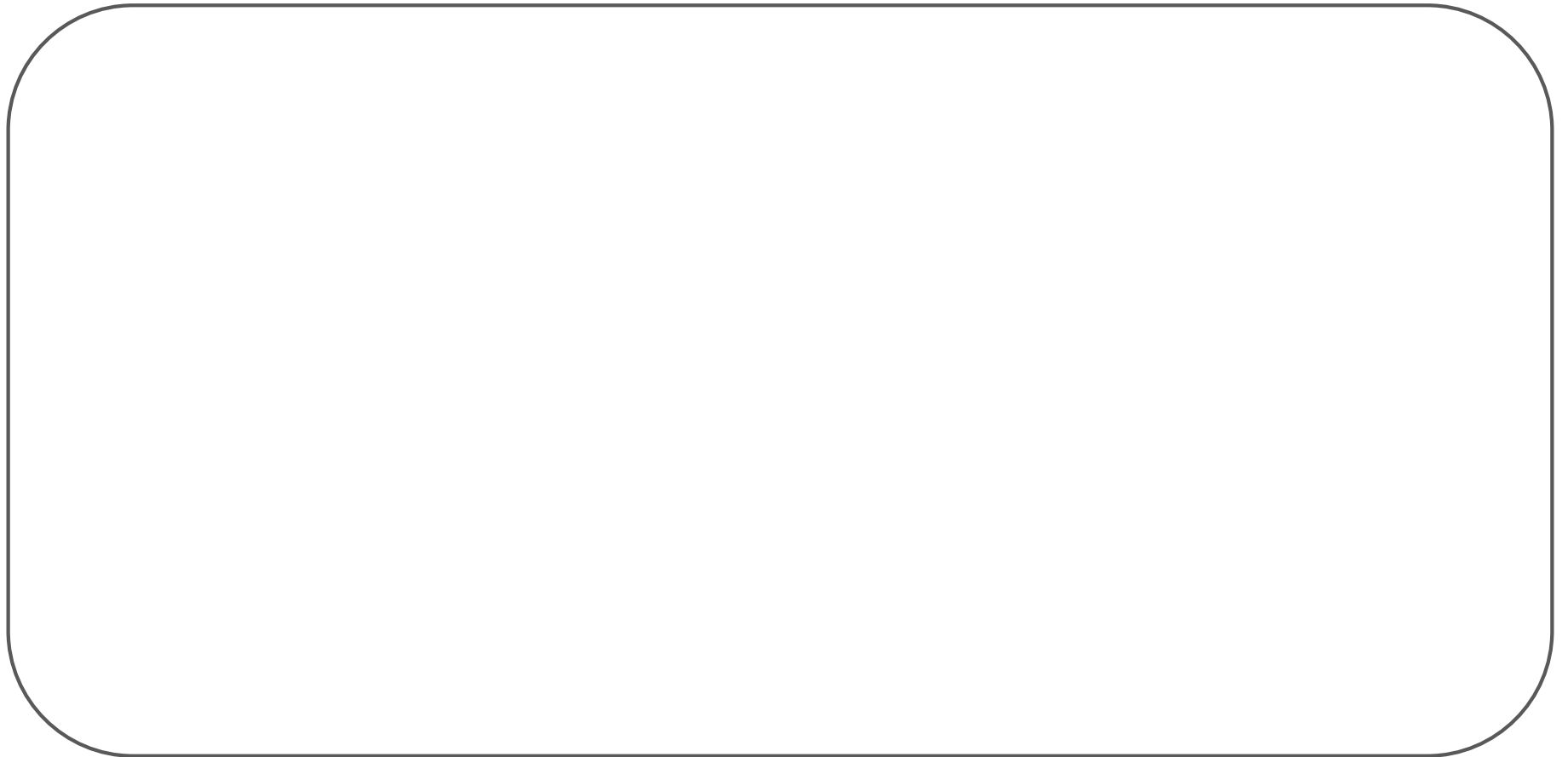
## FLA BENCHMARKS 'NON-COMPLIANCE' AREAS (2014 - 2017)

	<b>General Compliance - Benchmarks</b>
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.1.2	Other than lawfully required deductions, no other deductions may be made from a worker's compensation without the written consent of the worker. Financial disciplinary measures are prohibited.
C.1.3	In countries where local law does not specify compensation specific to the agriculture sector, the participating company shall consult with local stakeholders representing the employers (farmers), workers, local government and commissions, and civil society to define the appropriate wage level. As a general principle, employers shall follow the minimum wage standards set for other sectors in the same region.
	<b>Minimum Wage/Fair Compensation - Benchmarks</b>
C.2.1	Employers shall pay workers at least the legal minimum wage, the prevailing industry sector wage, or the wage pursuant to Collective Bargaining Agreements that are in force, whichever is higher, for regular working hours (not including overtime). Hourly or daily compensation shall be calculated based on the basis of the legal minimum wage, the prevailing industry sector wage, or the wage pursuant to Collective Bargaining Agreements that are in force, whichever is higher. Workers should also be informed by the employer about the legal minimum wage applicable to them.
	<b>Accurate Calculation, Recording and Payment of Wage/Prices</b>
C.7.2	FLA-affiliates shall ensure that farmers/producers receive payments and certification premiums through a traceable and reliable payment system.
C.7.5	No one can receive wages on behalf of a worker unless the worker concerned has, in full freedom, authorized in writing for another person to do so.
	<b>Calculation Basis for Overtime Payments</b>
C.8.1	Employers shall compensate workers for all hours worked.
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 the language(s) spoken by workers, about overtime wage rates prior to undertaking overtime.
	<b>Employers/labor contractors shall make every reasonable effort to ensure workers understand their compensation, including:</b>
C.11.1.1	the calculation of wages,
C.11.1.5	Employers shall communicate in writing or orally where necessary to all workers all relevant compensation information in the local language or language spoken by the workers, if different from the local language.

## General Picture in 2018

- **Minimum Wage/Fair Compensation, 'Worker Awareness' and 'Calculation Basis for Overtime Payments'** remain non-compliance areas as the compensation practices of previous years have not changed according to the findings:
  - Even though the farmers comply with local regulations for the payment of compensation to workers and pay them the legal minimum wage; deduction of labor contractors from workers' wages causes workers to earn below the minimum legal wage.
  - It should be noted that workers did not know the exact wage they would receive in 2018 since it was not announced by the commission. Interviewed members of the local community informed the evaluation team that 67.5TL would be the exact wage calculated for this year. It was observed that garden owners' tendency was to take the wage as 68TL but the workers were not informed about these personal decisions.
  - Even though the commission did not announce it, daily wage in 2018 was more or less determined as its calculation is based on daily minimum wage. However, it should be noted that the daily wage calculation of the Ministry of Labor and Social Security is based on an 8-hour working day and the working day was 10,5 hours during 2018 Harvest. This reduces the hourly wage under usual legal working hours and the FLA Codes.
- It should be noted that compensation is a very sensitive issue for garden owners and very closely related with **Farmer/Producer Income** (which is a progress indicator in the last IEM reports). Garden owners' own economic situation has been hit badly by fluctuating hazelnut prices in the last years. As of the fieldwork time, the hazelnut price for 2018 was not declared and the farmers were unable to forecast their income and profit margin. They feel 'abandoned' by the government and 'tricked' by the international hazelnut companies. Their resentment grows year by year and they feel very unwilling to discuss fair compensation for workers.

## *Balsu CAP – Compensation*



# THANK YOU!

**Zümrüt Aydın**  
Lead Evaluator

**Seval Gülen**  
Associate Evaluator

**Yonca Güneş Yücel**  
Associate Evaluator

**Burcu Kuğu Bolak**  
FLA Agriculture Alliance Project Director

