



# FAIR LABOR ASSOCIATION<sup>®</sup>

VERIFICATION / SOCIAL IMPACT EVALUATION  
IN HAZELNUT PRODUCTION  
EVALUATION RESULTS for OLAM

*October 2018*

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**ANNEX - Evaluation of Main EM 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 dark 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) Study



- Each year, the Fair Labor Association (FLA) verifies the internal monitoring programs of Nestlé, Olam, and Balsu regarding hazelnuts production through Independent External Monitoring (IEM) visits.
- During 2015 – 2018, the three companies participated in the USDOL project that led to an in-depth assessment of the companies' internal management programs and work place 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 have led to an improvement in conditions for workers.**



## The SIE Study – Key Steps & Timeline

1

June –  
July 2018

**Intervention Mapping:** *The company team was asked to fill an Excel Table capturing the 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

**Meeting Rounds with the Company Team:** *The FLA team came together with the Olam 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 Olam 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

13th–17th of  
August 2018

**Fieldwork/Data Collection:** *Fieldwork took place in the harvesting season, around the estimated peak activity dates. A team of three (3), including one (1) FLA staff and two (2) researchers, visited evaluation locations and interviewed target group members, 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 Olam and her implementing partners ILO, KEDV and Pikolo)

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

Focus group meetings at Intervention & Counterfactual Points

Observation at the safe space in Esmahanım (2 x half day sessions)

### Quantitative Methods - Randomized Controlled Experiments

Questionnaire – Survey Applied at Intervention & Counterfactual Points (administered to 109 workers at the intervention points & 90 workers at the counterfactual points)

## 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.*

INTERVENTION POINT	GV #	District/Villages	Interviewed Target Groups	Number of Female Workers Whose Data Collected	Number of Male Workers Whose Data Collected	Total Number of Interviewed Workers
	7	Akçakoca/Esmahanım,Uğurlu & Gümüşova/Dereköy, Ardıçdibi & Kocaali/Kirazlı	Workers, Supervisors and Garden Owners interviewed during each garden visit.	63	46	109

COUNTERFACTUAL POINT	GV #	District/Villages	Interviewed Target Groups	Number of Female Workers Whose Data Collected	Number of Male Workers Whose Data Collected	Total Number of Interviewed Workers
	5	Cumayeri/Taşlık, Üvezbeli, Ören	Workers, Supervisors and Garden Owners interviewed during each garden visit.	52	38	90

- The worker groups 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. A total of 125 workers at intervention points and 103 workers at counterfactual (control) points were reached within the framework of this study (both through garden visits and focus groups); there was no double counting between the focus groups and garden visits.
- 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
INTERVENTION POINT	1 IDI	District Governor of Kocaali	-
	1 IDI	District Governor of Akçakoca	-
	1 IDI	District Governor of Karasu	-
	1 IDI	Kocaali Provincial National Education Governor	-
	1 IDI	Karasu Provincial National Education Governor	-
	1 IDI	Kocaali District Director of Health Representative	-
	1 IDI	Esmahanım Village Headmen	-
	1 FGD	Olam Social Responsibility & Agricultural Program Staff	-
	1 FGDs	Regional ILO Coordinator for the Summer Schools	-
	1 FGD	Esmahanım Safe Space Teachers	-
	1 IDI	Esmahanım Safe Space Coordinator	-
	3 IDIs	Esmahanım, Kirazlı, Gümüşova Region Manavs	Also Participants of 'Farmer Trainings'
	2 IDIs	Male farmers	1 x Owner of Renovated House 2 x Participants of 'Farmer Trainings'
	2 IDIs	Labor Contractors ( <i>Complementary short interviews were conducted with Pikolo team members and a labor contractor who did not participate in the training in the aftermath of these interviews</i> )	1 x Supported Neighbourhood Mothers Program 2 x Mapped by Pikolo and Participated in the Training
	1 IDI	Neighbourhood Mother	Community Leader Woman



## Methodology & Sample – Qualitative Interviews

INTERVENTION POINT	FGD #	Profile	Beneficiary Status	Number of Interviewed Females	Number of Interviewed Males	Total Number of Interviewed Workers
	2 FGDs	1 Workers FGD – Young Worker Group	Family stays at <b>Renovated House</b> Their labor contractor mapped by Pikolo	2	5	16
1 Workers FGD – Family Group		Their labor contractor mapped by Pikolo They are in the <b>Neighbourhood Mother’s Workers Group</b>	5	4		
INTERVENTION POINT	FGD #	Profile	Beneficiary Status	Number of Interviewed Females	Number of Interviewed Males	Total Number of Interviewed Children
	1 FGD	1 FGDs with Safe Space Students aged 12 and below (at school)	Children attend <b>Safe Space</b>	6	2	8
COUNTERFACTUAL POINT	FGD #	Profile	Beneficiary Status	Number of Interviewed Females	Number of Interviewed Males	Total Number of Interviewed Workers
	2 FGDs	1 Workers FGD – Young Worker Group	-	5	4	13
1 Workers FGD – Family Group		-	3	1		

## Methodology – *Limitations & Challenges*



- **Finding a Completely ‘Untouched’ Control Group:** The original methodology required to identify a counterfactual point in the region (one or two villages where no social program was active) with the help of the company so that a control group could be formed. During the fieldwork visit to the proposed counterfactual point, it was observed that social programs of different companies and certification programs had been active in Cumayeri region. While the majority of the interviewed garden owners never participated in these programs, some garden owners claimed to have been involved with them in the past, usually for short time periods. Based on the interviews and observations, it was concluded that any social compliance related effort in the region by other companies or certification program had been either inconsistent or low intensity.
- **Wide Geographical Coverage:** The distances between fieldwork locations were long and a total of 7 villages were visited in 4 different districts within the framework of this study. Possible village-based variables that could affect the collected data were primarily a source of concern for the evaluation team but during the fieldwork it was seen that practices and conditions in the villages were mostly uniform at the district level.
- **Short Time Frame of Interventions:** Most of the interventions took place within the last year of the project, which is short a time period for creating substantial social change. Evaluation results should be considered taking this point in mind since as a result targets currently seem ‘unachieved’ in these areas.

## Methodology – *Limitations & Challenges*

- **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 be noted that some local authority representatives were openly unwilling to cooperate in this subject and as a result, it was not possible to access regional data.
- **High Targets:** The expected outputs, outcomes and impacts of the company interventions and their indicators were jointly identified and detailed in a short period of time before the data collection phase by Olam and the FLA teams. The evaluation findings prove 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 the 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. This was an especially trying task for the company in Cumayeri region (counterfactual point) as very few garden owners accepted to let the evaluation team in their gardens. In this region, the evaluation team was unable to reach the target minimum number of garden visits and had to stop at 5 garden visits.
- **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 giving 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, especially in Esmahanım. 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 local community members and workers alike.



## **EVALUATION of FINDINGS**

*General Context at  
Intervention & Counterfactual  
Points*



# Hazelnut is a prominent agricultural product in all fieldwork locations

## HAZELNUT FIELDS & PRODUCTION IN CITIES

The fieldwork took place in a geographically large area; a total of 7 villages in 4 different districts and 2 cities (Düzce and Sakarya) were visited.

Hazelnut is a prominent agricultural product both in Düzce and Sakarya. Especially in Düzce, nearly all available agricultural land is used for hazelnut production.

SAKARYA – Land Distribution			DÜZCE – Land Distribution		
	Hectar	%	Da	%	
Field land	85.369	36,29	Hazelnut	631.440	99,66
Vegetables	8.064	3,43	Walnut	1.405	0,22
Fruit	8.398	3,57	Apple	248	0,04
Hazelnut	72.798	30,94	Pear	198	0,03
Grape	4.661	1,98	Strawberries	98	0,01
Olive	731	0,31	Plum	54	0,008
Poplar	20.450	8,69	Kiwi	40	0,006
Other	34.785	14,79	Other	84	0,012
<b>Total</b>	<b>235.256</b>	<b>100</b>	<b>Total</b>	<b>633.568</b>	<b>100</b>

## HAZELNUT PRODUCTION IN DISTRICTS

	Area (%)	Area (Da)	Production (%)	Production (Tons)
<b>Akçakoca</b>	34,62	218.665	34,79	25.869
<b>Gümüşova</b>	5,50	34.760	5,75	4.280
<b>Cumayeri</b>	8,55	54.000	9,40	6.989
Düzce Total	100	631.440	100	74.350

Main fieldwork locations of this study account for 50% of total Düzce hazelnut production.

Data is limited for Kocaali/Sakarya. According to information provided by the Kocaali Governor, production for Kocaali was 21.628 tons in 2017.

## Farmer numbers and support provision rates confirm the prominence of hazelnut in the districts

2017			
District	Number of Businesses	Support Area (da)	Support Amount (TL)
Center	3,923	54.396,066	9.247.331,22
<b>Akçakoca</b>	<b>7,622</b>	<b>146.403,974</b>	<b>24.888.675,58</b>
<b>Cumayeri</b>	<b>2.377</b>	<b>43.441,743</b>	<b>7.385.096,31</b>
Çilimli	841	11.985,252	2.037.492,84
Gölyaka	1.577	24.085,043	4.094.457,31
<b>Gümüşova</b>	<b>1.520</b>	<b>22.818,988</b>	<b>3.879.227,96</b>
Kaynaşlı	1.357	16.057,648	2.729.800,16
Yığılca	5.443	83.329,516	14.166.017,72
TOTAL	24.660	402.518,230	68.438.099,10

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

Nearly half of the businesses who received support in Düzce are from Akçakoca, Cumayeri and Gümüşova.

The same rate is valid for 'Support Area' and 'Support Amount.'

Sources:

Düzce

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

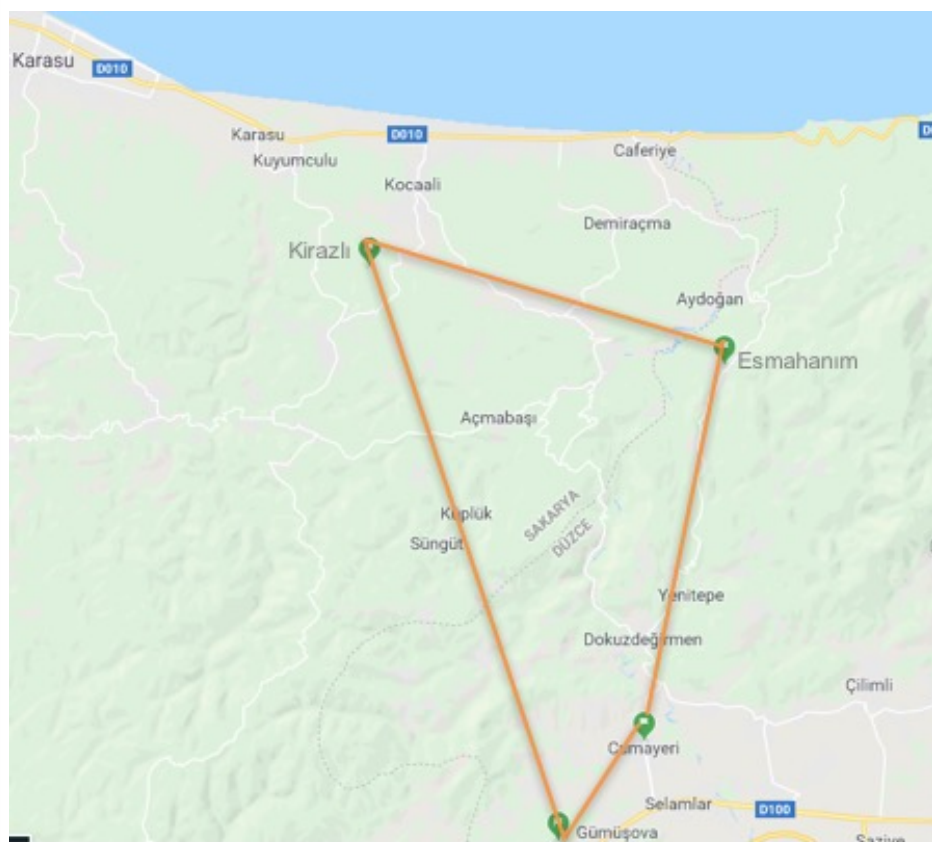
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Sakarya

<https://sakarya.tarimorman.gov.tr/Link/2/Istatistikler>

## However, as profit in hazelnut production erodes the village populations decline

### FIELDWORK LOCATIONS



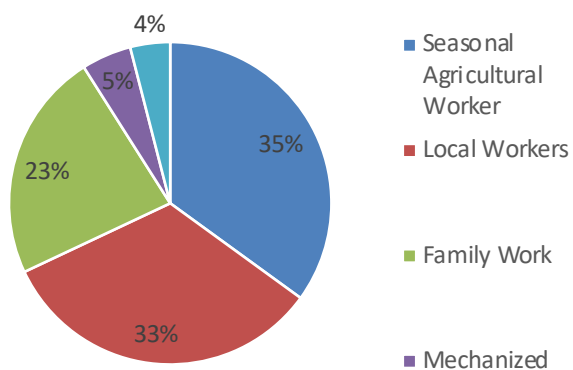
### POPULATION

		Female Population	Male Population	Total Population	
Intervention Points	Esmahanım	106	91	197	AKÇAKOCA TOTAL= 37.924
	Uğurlu	292	268	560	
	Dereköy	115	124	239	GÜMÜŞOVA TOTAL= 15.120
	Ardıçdibi	122	109	231	
	Kirazlı	88	96	184	KOCAALİ TOTAL= 20.858
Counterfactual Points	Taşlık	60	61	121	CUMAYERİ TOTAL= 13.901
	Üvezbeli	85	96	181	
	Ören	246	247	493	

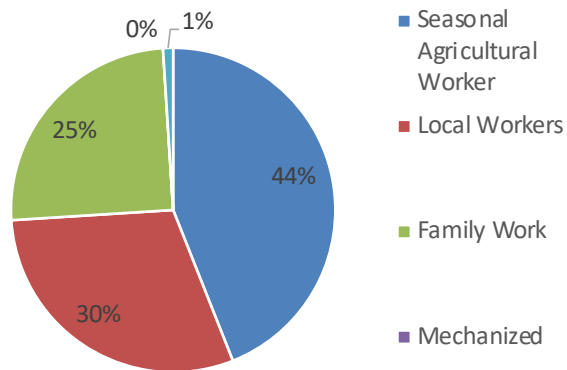
The villages where fieldwork took place are important production areas in the districts, yet their populations have been declining. Due to the erosion in profits in hazelnut production and limitation of business alternatives in production areas, especially the youth are leaving the villages. according to community members.

# Demand for seasonal agricultural workers has been increasing in the region

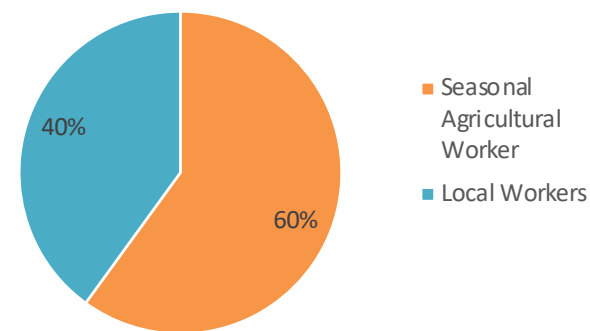
Harvest Type 2017



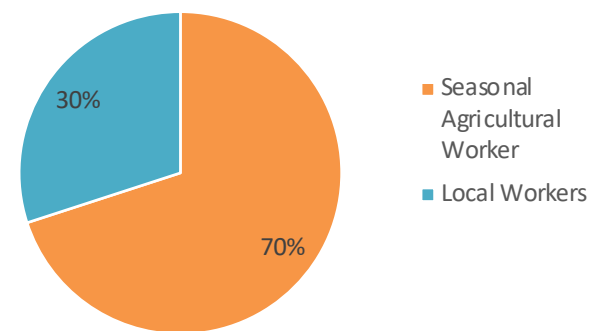
Harvest Type 2018



Worker Status 2017



Worker Status 2018



Olam internal monitoring findings confirm that demand for seasonal agricultural workers has been increasing.

70% of the labor force consisted of seasonal agricultural workers in 2018.



## Villages continue to host considerable numbers of workers during each harvest

### NUMBER OF WORKERS & CHILDREN WHO TRAVELED TO INTERVENTION & COUNTERFACTUAL POINTS IN 2018

Regions	# of Workers	# of Female Workers	# of Male Workers	# of Children	# of Young Workers	# of 18+ Workers
Esmahanım	168	94	74	9	62	97
Uğurlu	69	37	32	4	20	45
Ardıçdibi	50	25	25	2	8	40
Dereköy	160	86	74	0	45	115
Kirazlı	112	73	39	5	28	79
Cumayeri	105	54	51	14	35	56

According to 2018 Olam Internal Audit records, out of 559 workers identified at the intervention points, 20 were children (3,5%). In contrast, 14 were children (13%) among the 105 workers accessed by the evaluation team.

It is understood that Olam's data is collected during garden visits, which means that the evaluation team is unable to reach the total number of individuals and children who traveled to the region.

## Hazelnut production is a priority issue for the local authorities but stances on social compliance issues differ

The FLA team interviewed representatives of local authorities in Akçakoca, Kocaali, and Karasu to have a better understanding of the general context within which Olam's social program is being shaped. All interviewed representatives emphasized that they are aware of the importance of hazelnut production for the region, but it was observed that the level of engagement in social compliance issues and willingness to cooperate with private sector actors varies from district to district and from institution to institution.

### Common Obstacles to Taking Action for the Public Sector

Know-how and capacity-related problems due to a state of transition in the public sector

Unwillingness to take action/initiative during a state of transition

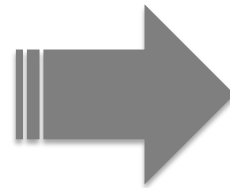
Grey areas of responsibility

Limited resources available

High tension in the field due to fluctuating hazelnut prices



Differing Levels of Awareness, Engagement and Willingness to Cooperate



*Local authorities' presence in the field and action capacity are limited due to certain factors. But cooperating with the authorities, especially having the support of district governors, opens doors.*

*Olam has good relations with most of the public actors and they all perceive Olam as a positive change agent. However, cases in which points of contact are newly appointed or unwilling to cooperate may slow down or hinder the efforts.*

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# **EVALUATION of FINDINGS**

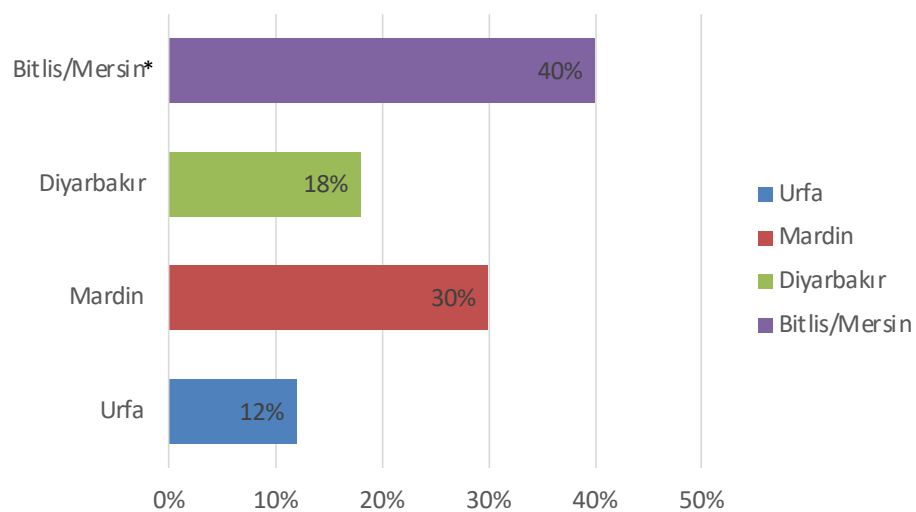
## ***General Profile of Workers in 2018***

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

## General Worker Profile – *City of Origin*

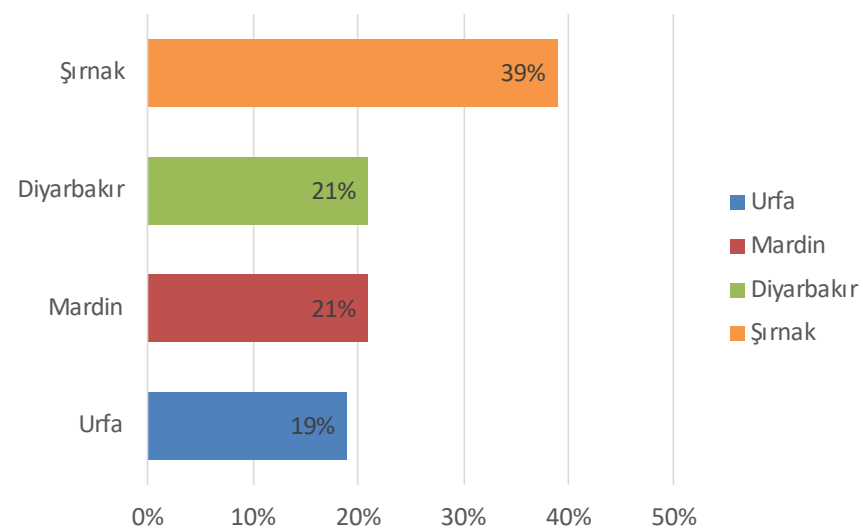
Data collected from 109 workers in 7 gardens in Akçakoca, Gümüşova and Kocaali regions (intervention points) and 90 workers in 5 gardens in Cumayeri district villages (counterfactual point) show that workers are mainly coming from 5 cities.

### Cities of Origin - Intervention Points



*\*This group is originally from Bitlis but they moved to Mersin in recent years to be closer to job opportunities.*

### Cities of Origin- Counterfactual Points



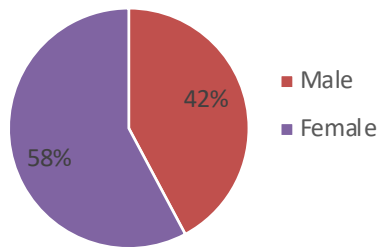


# General Worker Profile – Gender & Age

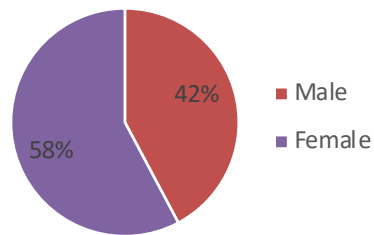
Gender distribution is the same both at the intervention and counterfactual points. Nearly in all gardens visited, female workers outnumber male workers.

In contrast, age distributions are strikingly different from the labor force at the counterfactual points being younger.

Gender –  
Intervention

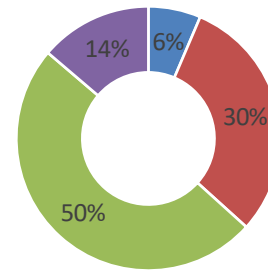


Gender –  
Counterfactual



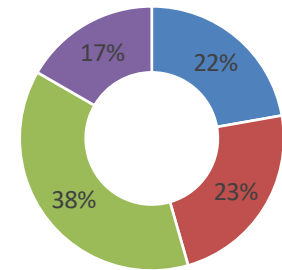
Age Breakdown -  
Intervention

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



Age Breakdown -  
Counterfactual

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



## General Worker Profile – *More on Gender & Age for Those Below 18*

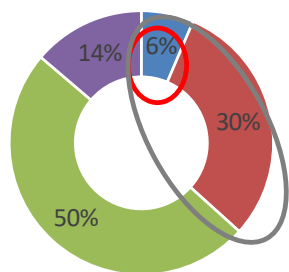
46% of the interviewed workers were below 18 years of age at the counterfactual points. In contrast, this rate is 36% at the intervention points.

Furthermore, the rate of children below 16 years old within the worker's groups is significantly higher at the counterfactual points. It should be also noted that children's average age is lower in counterfactual points compared to intervention points.

The ratio of female workers to male workers is very high among young workers (between 16 and 18) at the intervention points. This is not the case at the counterfactual points. However, the ratio of males to females is strikingly high at these points among children. The evaluation results do not point to any cause for this difference.

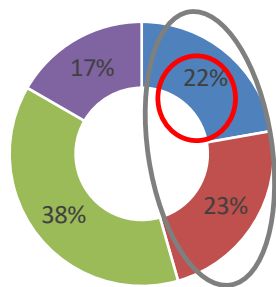
Age Breakdown -  
Intervention

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



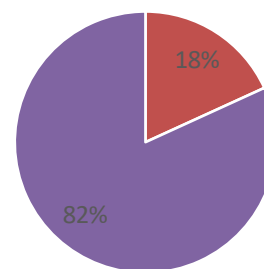
Age Breakdown -  
Counterfactual

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



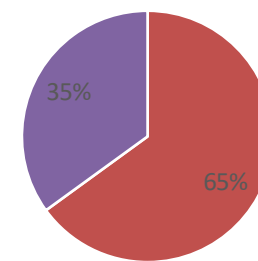
Gender Breakdown of  
Young Workers -  
Intervention

■ Male ■ Female



Gender Breakdown of  
Children -  
Counterfactual

■ Male ■ Female

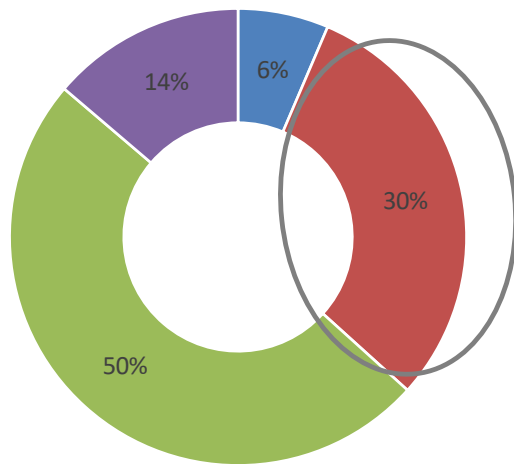


# Number of Young Workers Across the Years at Intervention Points

Young workers have been constituting at least 16% of the labor force in hazelnut harvesting in the last 5 years according to 2014-2017 IEM data and 2018 FLA Verification/Evaluation Study. If one assumes that the exceptional dip in 2016 is a statistical outlier and exclude it, it can be concluded be said that young workers have constituted at least a quarter of the labor force in hazelnut harvesting each year.

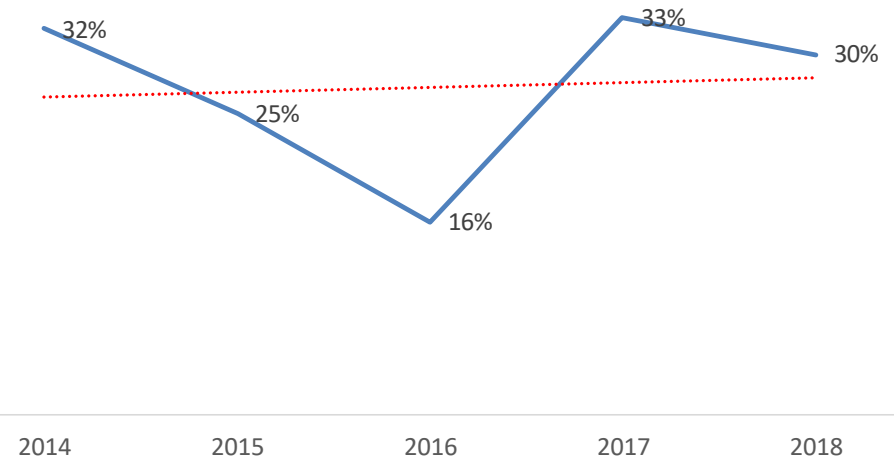
### Age Breakdown - Intervention

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



### Rate of Young Workers in Total Across Years \*

— Rate of Young Workers in Total Across Years  
..... Linear (Rate of Young Workers in Total Across Years)



*\*Data collected from Sakarya region during IEMs were taken into account for this comparison. Records for Western Black Sea region starts from year 2014 as data was not collected during 2013 IEM from this region.*

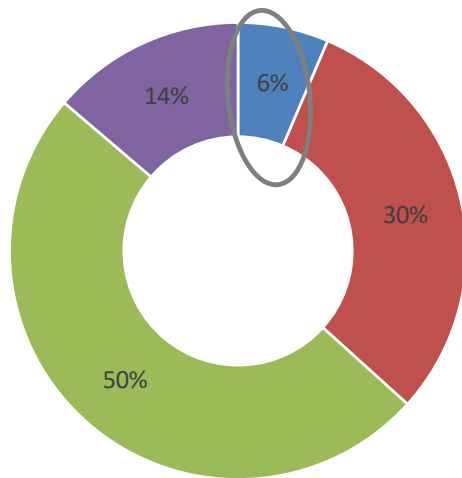
# Children Engaged in Child Labor at Intervention Points

6% of the total interviews individuals (total of 8 children) reported being 15 years old or younger, thus constituting child labor. This is one of the lowest rates of child labor in recent years for this region.

It should be also added that in the immediate aftermath of the garden visits, Olam's team contacted all garden owners to further examine child labor and other non-compliance cases and take possible measures. Remediation plans and actions taken were also shared with the FLA team.

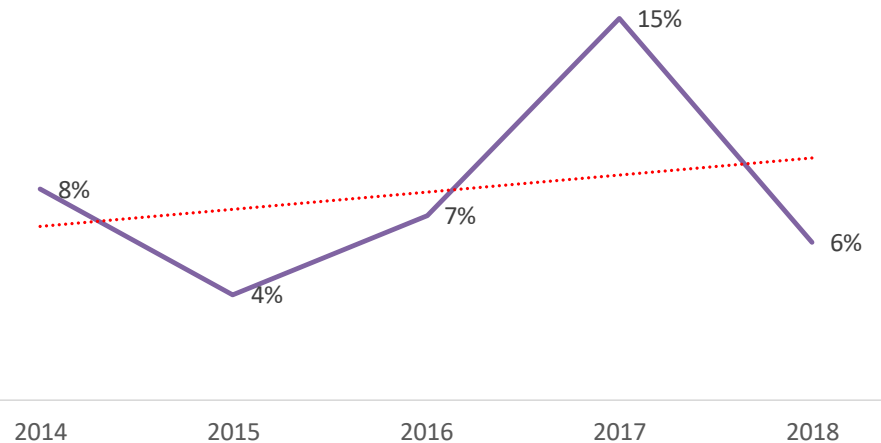
### Age Breakdown - Intervention

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



### Rate of Children in Total Across Years

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



*\*Data collected from Sakarya region during IEMs were taken into account for this comparison. Records for Western Black Sea region starts from year 2014 as data was not collected during 2013 IEM from this region.*

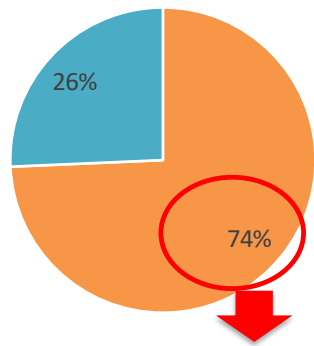
# Safe Space Effect – Awareness Rate

The rate of awareness of the safe spaces at the counterfactual points was substantially lower than at the intervention points. Nonetheless, even at the counterfactual points over a third of the interviewed individuals had heard about safe spaces thanks to word of mouth of relatives and neighbors in the city of origin.

Although the majority of workers were aware of the safe space spaces at the intervention points, it should be highlighted that there were no summer schools nearby in some villages. Word of mouth was an effective dissemination channel in this group too.

### Safe Space Awareness – Intervention

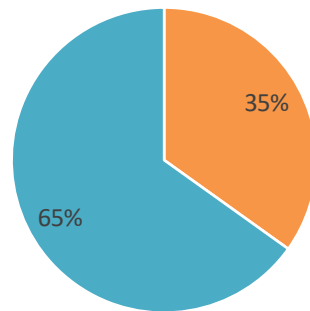
■ Aware ■ Not Aware



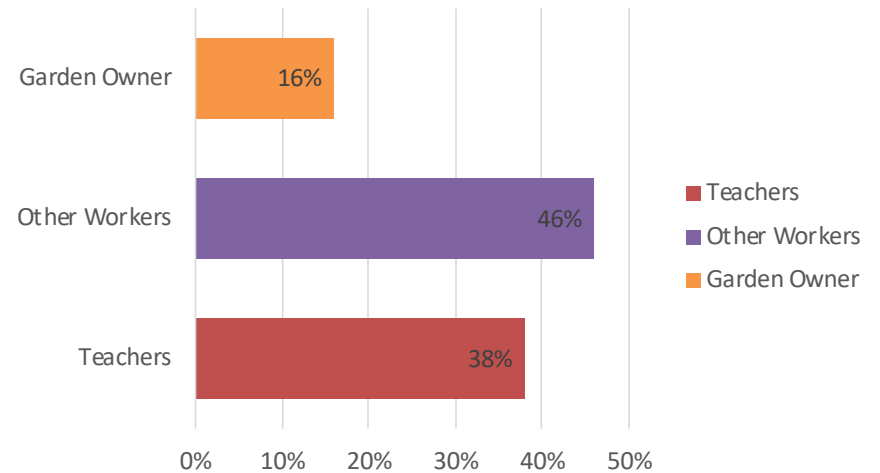
There is no school nearby for 37% (Ardıçdibi & Dereköy villages)

### Safe Space Awareness – Counterfactual

■ Aware ■ Not Aware

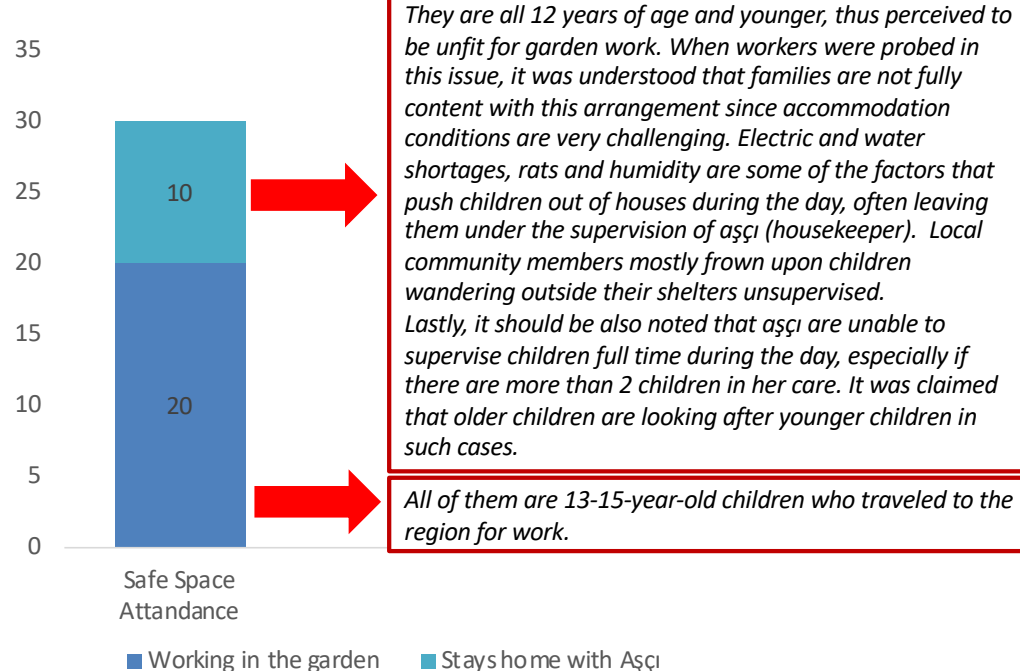
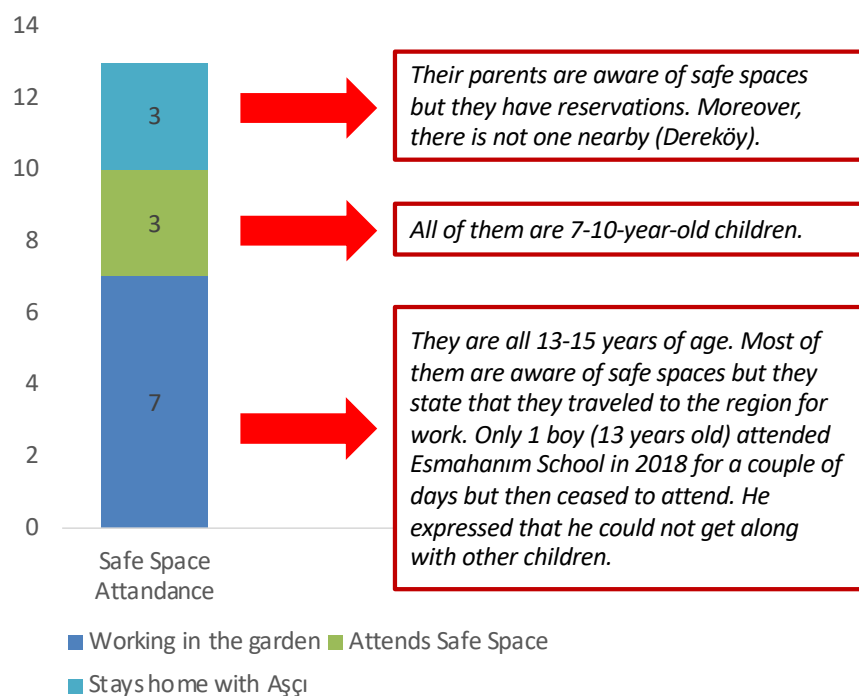


### Source of Awareness



# Options for Children in the Regions

In 7 worker groups, it was found that a total of 13 children (15 years old and younger) traveled to intervention points with their families. 3 of these children, 10 years of age or younger, attended safe space in Esmahanım. It should be also noted that remaining children (and their parents) are all aware of safe spaces but they prefer not to enroll them due to various reasons.



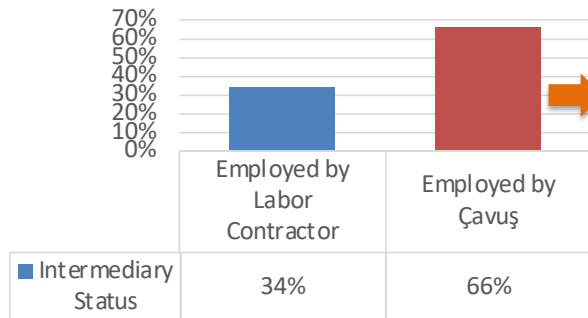


# On Access to Employment

All workers interviewed within the framework of this project at intervention and counterfactual points were employed through an intermediary. Participants' accounts indicate that the intermediaries are the central figures in labor relations during the harvest, and it is almost unthinkable for workers to establish a direct connection with the garden owners.

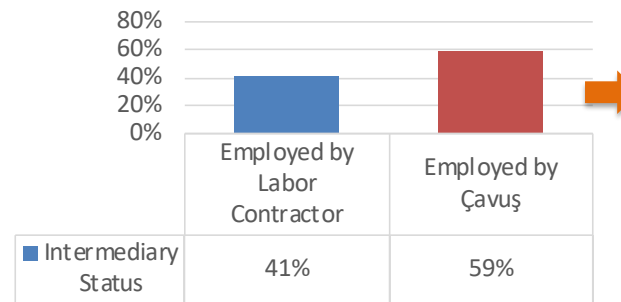
There are currently two intermediary types in the field: labor contractors and supervisors ('Çavuş'). Supervisors traditionally have been working under labor contractors but it is seen that more and more supervisors establish their own business connections with employers without being bound to any labor contractor. Supervisors work with a smaller group of workers than labor contractors; the number of workers per group usually varies between 10 and 20. It is observed that the classic labor contractor model is being challenged by this new sub-group.

Intermediary Status - Intervention



*A considerable part of these cases are from Gümüşova. Garden owners in the Gümüşova region insist on employing workers via Çavuş since they do not deduct a 10% service charge from workers' wages.*

Intermediary Status - Counterfactual



*Unlike in Gümüşova, garden owners in Cumayeri do not insist on accessing workers via supervisors.*

*Therefore this significant rate indicates that a considerable part of the labor force prefers to work with supervisors, rather than with labor contractors.*

# On Access to Employment

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

- **For half of the workers** interviewed at the intervention points, they perceive the **intermediary as their employer**. They receive the necessary information about their work from him and he takes care of their needs during the harvest. Most receive their wages from the intermediary as well, but it was learned that **in 2 gardens, garden owners were making direct payments to workers**.
- In contrast, nearly all workers at counterfactual points perceive their intermediary to be their employer and they have very limited contact with the garden owner.
- Intermediaries are the main contact that workers have for complaints or feedback. **Only 7% of the workers at the intervention points recall that they were informed about a Company Grievance Hotline** during company training sessions. They stated that they would first prefer talking to their intermediary in any case.
- Intermediary services have a price: **Nearly all labor contractors deduce 10% from workers' daily wages**. Meanwhile, **supervisors take money (payment for their services) from the garden owner**. It was stated that a supervisor takes a single wage if he only supervises the workers and double wage if he additionally works with them.
  - **In one garden in Esmahanım**, workers stated that they negotiated with their labor contractor to lower the deduction rate. They negotiated for the labor **contractor to deduce 5% from their wages**, according to their statements.
- **All workers at intervention and counterfactual points stated that usually intermediaries (labor contractor or supervisor) take care of their transportation (from the city of origin to the harvest zone) and food costs and they often get indebted to them before leaving their city of origin. The workers 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.**


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## **EVALUATION of FINDINGS**

*In-depth Evaluation of Prioritized  
Areas of Interventions*

***SAFE SPACE***

## SAFE SPACE in Esmahanim – Key Result Chain Targets

	Outcomes	Outcomes indicators	Impact	Impact Indicator
Target	(1) Access to education and safe areas for children during harvest facilitated	Indicator 1. A minimum of 80% of the children attended curricular/other activities Indicator 2. Number of children found during internal monitoring were referred to the summer school Indicator 3. # of children provided with nutritious lunch Indicator 4. # of children improved behavior in terms of hygiene.	(1) To contribute to reducing child labor by providing a safe space.	Indicator 1: # of Children found in the hazelnut garden
Evaluation	<p>Indicator 1. A minimum of 80% of the children regularly attended curricular/other activities – <b>The data is limited on this subject. It is only known that 91 students attended the safe space for 7 or more days according to data provided by ILO. However, during the interviews it was stated that a maximum of 45 students were regularly attending the safe space.</b></p> <p>Indicator 2. Number of children found during internal monitoring referred to the summer school - <b>The evaluation team does not have the numbers for each village from where the students are coming, except Esmahanim. 9 children were spotted during the internal audits in Esmahanim and referred to the safe space.</b></p> <p>Indicator 3. # of children provided with nutritious lunch – <b>All attending children were provided with an overall nutritious lunch</b></p> <p>Indicator 4. # of children improved behaviour in terms of hygiene - <b>The team was unable to evaluate ‘improved behaviour in terms of hygiene’ indicator due to lack of data.</b></p> <p>However, there are also other positive signs indicating outcome level targets that were achieved or about to be achieved: (1) Access to education and safe areas for children during harvest facilitated – <b>Information on child labor and safe spaces were communicated to all workers accessed in 2018 via trainings. Also, 74% of workers interviewed in the gardens and their children were aware of the safe space activities.</b></p>		<p>(1) To contribute to reducing child labor by providing the safe space – <b>The child labor rate is 6%, which is the lowest in recent years according to the findings of garden visits. All interviewed parties credited the safe space in this regard but they also added that the safe space has difficulty attracting older children.</b></p> <p>Please also see the relevant slide in the Annex section.</p>	

## In-depth Evaluation – SAFE SPACE

*Based on the existing information, it can be concluded that **the safe space in Esmahanım contributed to a reduction of child labor in the region** but it is not possible to determine its exact impact with the available data\*.*

*Nonetheless, interview findings and observations prove that **securing continuous attendance of the high-risk group, 13-15-year-old children, is still the most important challenge that the system faces.***

*At the moment, the safe space mainly attracts children 12 years old and younger and minimize their exposure to often unfavorable accommodation conditions-related problems. Accounts from the counterfactual points indicate that these experiences can be quite negative, sometimes even traumatic, for children. Furthermore, one can argue that those younger children will be members of high-risk group in a couple of years time and they may continue to keep attending the school in the future as a result of improved awareness and acquired habits.*



*\*The safe space data was provided by Olam's implementing partner ILO, The regional data collected between 2015-2018 were not available to the evaluation team to compare with the numbers of children registered in the safe space. Evaluations and conclusions drawn rely mostly on secondary data such as the regional committee action plans, previous FLA reports and claims of interviewees.*

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

### 2015 Safe Space Numbers

**30 Children** Registered from Esmahanım, Dilaver, Davutağa, Uğurlu, Kozluk villages

**Number of seasonal migratory families' children:**  
**17**  
**Number of local children:** 13

Majority are from two cities:  
**Mardin & ŞanlıŞanlıurfa**

30 children attended the school for at least 7 days

### 2016 Safe Space Numbers

**34 Children** Registered from Esmahanım, Dilaver, Davutağa, Uğurlu, Kozluk villages

**Number of seasonal migratory families' children:**  
**19**  
**Number of local children:** 15

Majority are from two cities:  
**Şırnak & Diyarbakır**

34 children attended the school for at least 7 days

### 2017 Safe Space Numbers

**78 Children** Registered from Esmahanım, Dilaver, Davutağa, Uğurlu, Kozluk, Yenice, Kepenç, Hemşin villages

**Number of seasonal migratory families' children:**  
**47**  
**Number of local children:** 31

Majority are from two cities:  
**Şırnak, Batman and Mardin**

78 children attended the school for at least 7 days

### 2018 Safe Space Numbers

**91 Children** Registered from Esmahanım, Dilaver, Davutağa, Uğurlu, Kepenç, Küpler and Orta Mahalle

**Number of seasonal migratory families' children:**  
**82**  
**Number of local children:** 9

Majority are from two cities:  
**Şırnak, Diyarbakır, Mardin**

91 children attended the school for at least 7 days



# Number of Children Registered

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Number of seasonal migratory families' children: 82

Number of local children: 9

Majority are from two cities: Şırnak, Diyarbakır, Mardin

91 children attended the school for at least 7 days

*The evaluation team could not access regional child data collected by the local authorities in 2015-2018.*

*A regional data set for 2017-2018 was provided by Olam based on their internal audit findings. However, as Olam data is based on garden visits (as an example, no children were spotted during the 2018 audits according to records) and thus unable to give the total number of children in the region.*

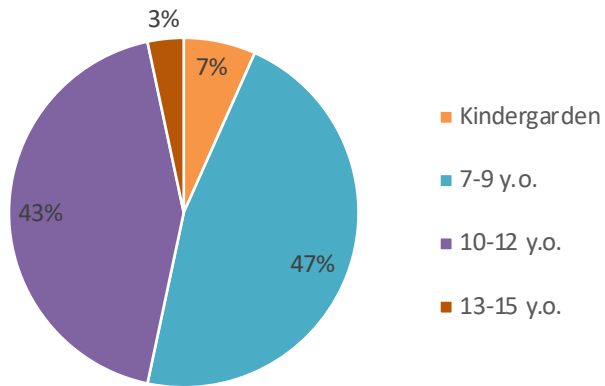
Even though the evaluation team was unable to access regional child data to explore the school's contribution to a reduction in child labor, it can be accepted as a positive sign that the number of children registered in the safe space increased every year.

According to '2017 FLA Procurement Price Study findings' and '2018 Report on Social Support Action Plan for Seasonal Agricultural Workers', regional coverage has considerably increased in last 2 years.

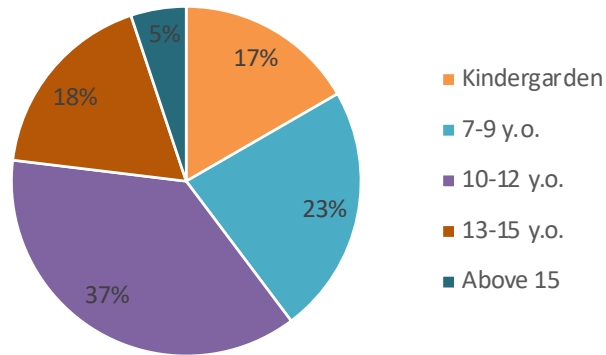
According to these reports, regional coverage of the target group in Akçakoca was 22.9% in 2017 and 42% in 2018. Both reports credit the activities of Esmahanım Safe Space for the increased coverage.

# 2015-2018 Safe Space Records – Age Breakdown

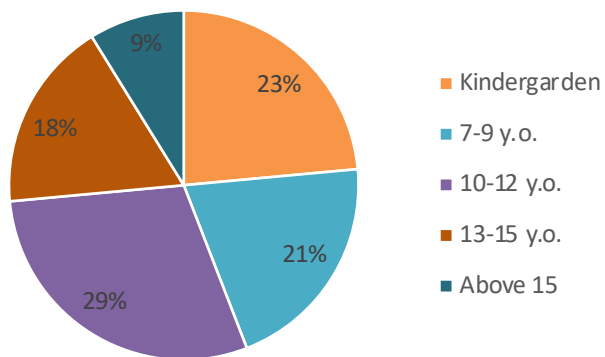
Age Breakdown 2015



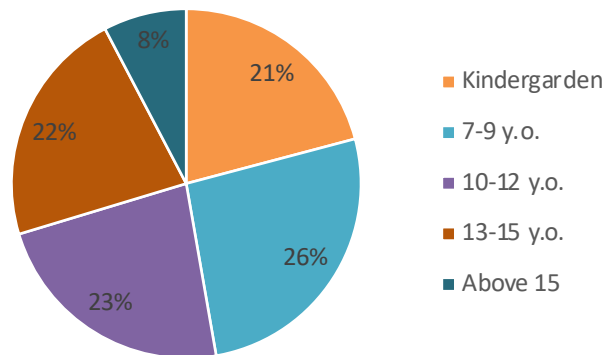
Age Breakdown 2017



Age Breakdown 2016



Age Breakdown 2018

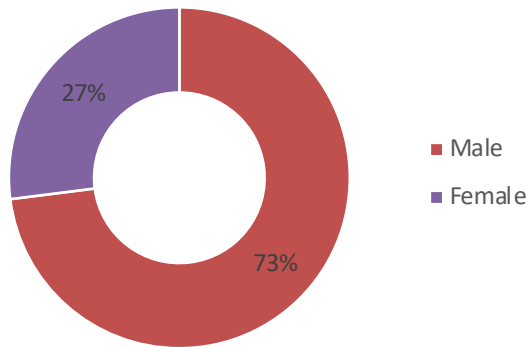


*Age breakdowns show that the majority of the attending children were 12 years old or younger in all 4 years: -97% in 2015, -73% in 2016, -77% in 2017, -70% in 2018*

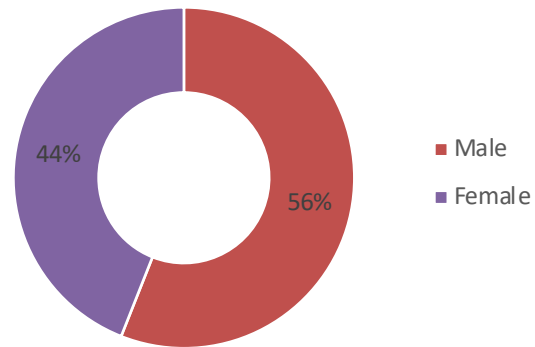
*On the other hand, the rate of 13-15 years old children have been increasing year by year.*

# 2015-2018 Safe Space Records – Gender Breakdown

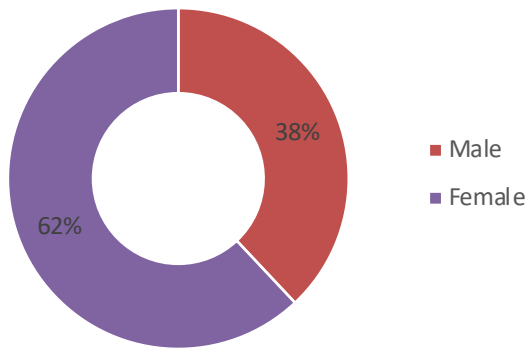
Gender Breakdown 2015



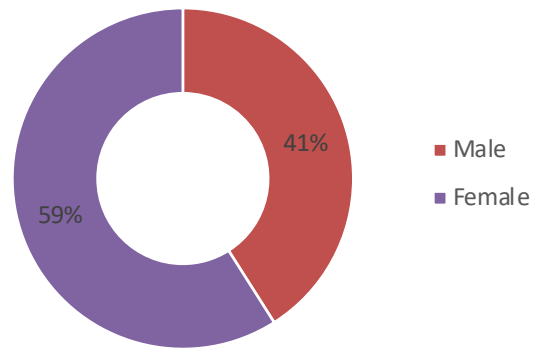
Gender Breakdown 2017



Gender Breakdown 2016



Gender Breakdown 2018

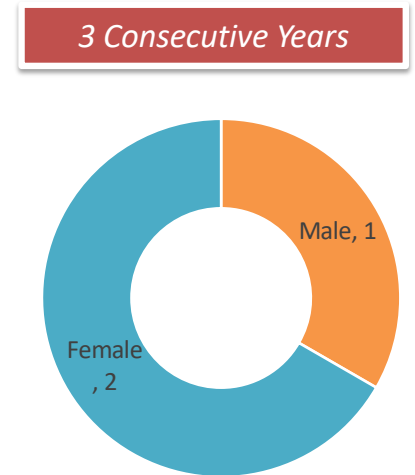
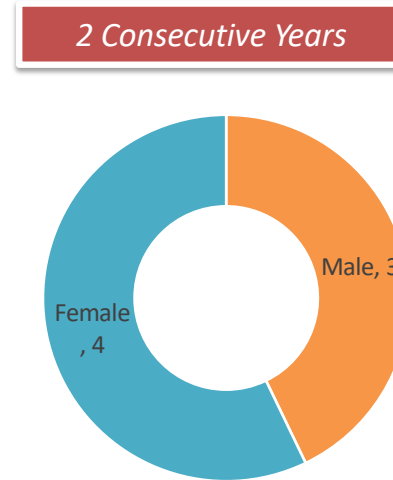
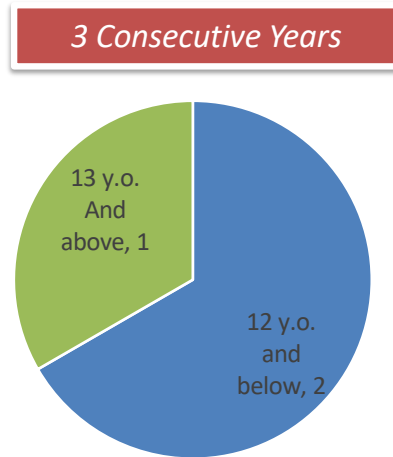
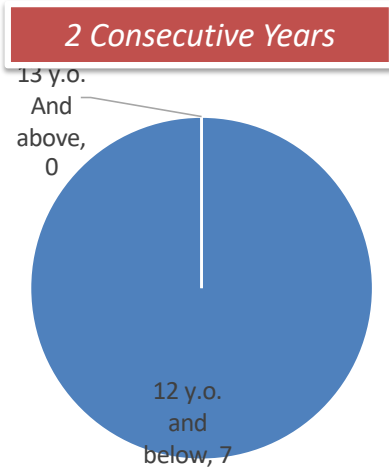


*It is seen that the gender breakdown was more balanced in 2017 and in 2018.*

*Previously either male (in 2015) or female (in 2016) students considerably outnumbered the other group.*

# Attendance over the Years

According to 2018 records, out of the 91 children registered 7 attended the safe space consecutively for 2 years and 3 for 3 years.



*The majority of those attending the school for the last 2 years are 12 years old and younger.*

*Females outnumbered males but the gap is not very wide.*

## In Depth Evaluation Areas – *Access & Securing Attendance*

Access to children and securing their attendance are key tasks of safe space staff. In the Esmahanım case, the examination of numbers of registered children in the last 4 years proves that there is progress in terms of regional coverage and access to the target group. Nonetheless, it is understood that the safe space has yet to reach its full potential due to limited resources.

**Access to Children & Families:** The number of children registered in the school tripled since 2015, but it is understood that there is still room for progress according to teachers. Teachers launched exploration trips in the region just before the start of harvest to get in touch with the target group and to start registering the children but it is understood that this was not enough by itself and efforts had to continue throughout the harvest. However, it is seen that the safe space was understaffed to be able to increase its regional coverage and to register more children. In 2018, nearly all steps of access, registration, and follow-up processes were solely led by the head teacher, since the core staff -- consisting of 7 teachers including the head teacher are all full time occupied in classes, once the safe space becomes operational. Furthermore, it should be also considered that the safe space would need additional student shuttles if the number of children was to increase. The school had one shuttle in 2018 and the shuttle had to make 3 rounds of trips each day to take students to their homes. Children waiting for the last round usually played in the playground for an extra hour before going to their homes.

**Attendance Rates:** Although registration numbers increased year by year, securing registered children's attendance remains to be a challenge. It was learned that out of 91 registered children, 45 were regularly attending the school. It was reported that children of all age groups register before the harvest but the struggle begins once the harvest gets going. The number of workers and children increase in the region as the harvest starts and particularly registered children who are older than 12 years old are likely to cease attending the safe space. The evaluation team observed that the overwhelming majority of children who were regularly attending the school at the time of the fieldwork were 12 years old and younger. Therefore it was not possible to organize an older age children focus group. It was observed that there were no established follow-up procedures at the school level but the school coordinator tried to reach out to students who ceased to attend through his personal efforts and limited resources. However, he stated that he faced significant hardships especially while interacting with older children and their families.

It is important to note that neither Olam nor the safe space staff has enough leverage if the family and child refuse to return to school. Persuasion skills are often the only available tool in these cases. The evaluation team noted that shouldering of persuasion efforts by only one person can be emotionally draining and working as a team with the school counselor may be an option. However, it is understood that the school counselor rotates between different safe spaces during the harvest and as a result, he may not be available when needed.

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

Overall, the safe space performs well in two key evaluation areas: education content and cultural diversity. However, it should be noted that there are some areas for future consideration or improvement.

**Education Content:** The school was active between 9am-3pm during the week days. 5 classes were opened for different age groups: one for pre-school children, one class for 1<sup>st</sup> and 2<sup>nd</sup> grades, one class for 3<sup>rd</sup> and 4<sup>th</sup> grades, one class for 5<sup>th</sup> and 6<sup>th</sup> grades and one class for 7<sup>th</sup> and 8<sup>th</sup> grades. The safe space teachers conducted need assessment tests for each group before the start of the term and the syllabus was developed according to the results. The school day was divided into two parts: more academic courses, like Turkish, Math, Social Sciences and Life Sciences, were delivered in the morning. After lunch, there were sports and social activity hours. Chess and folk dance classes were available too. Teachers observed that the students are more engaged in activity classes. They emphasize that even though the content was academic, particularly in the morning sessions, they made an effort to make topics more fun and easy to follow. Making the summer school ‘a fun place’ is particularly important for attracting children above 12 years old. Additionally, in ‘2018 Report on Social Support Action Plan for Seasonal Agricultural Workers’ it is stated that an array of activities that were not discussed during the fieldwork were conducted at the schools, such as the attention and concentration tests, addiction tests, professional orientation support sessions and self confidence booster activities. The evaluation team noted that training materials is a central issue to keep this system successfully running. The safe space teachers had two feedbacks about this issue: (1) materials to be used were determined and purchased before consulting with them (even though they do not face major problems while teaching as a result, some specific needs may go unnoticed); and (2) they were partly unclear how ILO and Olam share responsibility in logistic issues and who should be their main point of contact when they need extra supplies.

**Cultural Diversity:** Interviewed parties believe that the safe space performs well in terms of cultural diversity. Some of the teachers have prior experience with the target group; they either formerly taught in the city of origin of the students or participated in previous years’ safe space activities. It was learned that new teachers go through a short orientation session before participating in the project. A school counsellor is ready to provide support when needed. Nonetheless, language can be a barrier in some cases, especially in pre-school class. There is one Kurdish speaker among the teachers and if he is engaged in another class, siblings or relatives support the student who struggles with language barrier. Safe space teachers expressed that social cohesion is not a problem, as the number of local children declined especially in 2018 (though they are not sure about the reasons) and younger age children socialize more easily. It was also added that a large group of community members and seasonal agricultural family members attend each year’s closing event and this event serves as an important platform for overall social cohesion.

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

Evaluations showed that physical conditions of the safe space created problems for the teachers and the students especially at the beginning of the term. Evaluations on food provided and hygiene education are somehow limited by the available data and based mostly on observations and accounts of the interviewees.

**Physical Environment:** Overall, Esmahanım is a spacious school with an attractive playground for children, but it should be noted that this school is not active during the year and is often shut down once the safe space activities terminate. The school is painted and necessary repairs are made before it becomes active each year. However, occasionally, it takes time to make the necessary repairs and repair efforts may even continue during the summer school term.

Water supply was a major problem in 2018. It was reported that the running water was muddy, which constituted a major health and hygiene problem at the school, and it took some time to fix it. It was also observed that there is no kitchen at the school. As washing the dishes was a problem, disposable utensils were used at all times. However, per the village headman's account, there is a garbage disposal problem in Esmahanım village and it is observed that the safe space's undisposed daily garbage had potential to pose a health and environment risk. The Olam team was notified about this issue by the evaluation team and immediate measures were taken to solve the problem.



### **Hygiene Education:**

It is targeted to support the establishment of general habits, such as washing the hands before meals and face in the mornings. Also, general health scans were conducted. It is observed that there are no further targets or goals set beyond these points and accordingly, data is not collected either on the hygiene habits of the children or about any potential behavioral change.



## 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, available information is limited to make detailed comments.

**Nutritious Quality of Food Provided:** The school works with the sole certified catering firm in the region. Overall, teachers and children express that they are satisfied with the food provided. Daily menus can be changed or additions can be made when teachers ask for it. As a daily routine, breakfast, lunch and snacks (often fruits) are offered to all attending children. It is stated that attention is paid to include carbohydrates, proteins and fat sat the main meals to form a healthy menu, but there is no monthly menu record to validate these claims or make further comments.

A world map in light gray with a grid of latitude and longitude lines. A solid dark 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*

***LABOR CONTRACTOR TRAINING***

# LABOR CONTRACTOR TRAINING – *Key Result Chain Targets*

LABOR CONTRACTOR TRAINING – <i>Key Result Chain Targets</i>				
	Outcomes	Outcomes Indicators	Impact	Impact Indicator
Target	(1) Labor Contactor's awareness about the eliminating of child labor, and working conditions of seasonal migrant improved. (2) Ethical recruitment practices improved.	Indicator 1: # of workers that work under contractual agreement	(1) To contribute to reducing child labor. (2) To contribute to improving working conditions	Indicator 1: # of Children found in the hazelnut garden.  Indicator 2: # of workers working 8 hours  Indicator 3. # of workers receiving minimum wage without deduction.
Evaluation	Indicator 1: # of workers working under contractual agreement - <b>Olam piloted working under contract in 2018 with 'champion' harvest actors. No contracts were made in the previous years. 533 workers, 9 labor contractors and 52 garden owners signed contracts in 2018. It is also learned that out of 533 workers, 42 signed contracts with more than one garden owners.</b> Please also see the relevant slide in the Annex section		Indicator 1: # of children found in the hazelnut garden – <b>8 children were found in the gardens within the scope of this study's garden visits. Interview findings suggest that rate of working children is declining year by year and labor contractors are particularly sensitive on this issue.</b>  Indicator 2: # of workers working 8 hours – <b>None worked 8 hours in 2018 but intermediaries in some regions supported initiatives to end the work half an hour earlier.</b> Please also see the relevant slide in the Annex section  Indicator 3. # of workers receiving minimum wage without deduction – <b>66% of workers identified during the garden visits were employed via a supervisor and supervisors do not deduct their service fee from workers' wages. However, most of these workers also stated that there will be transportation and food costs-related deductions.</b> Please also see the relevant slide in the Annex section	

*It is observed that labor intermediaries are central figures for Olam's Program. Olam is making a considerable effort to transform these figures into allies in the field, as Olam team provides consultancy to mapped labor contractors and they are in regular contact with them throughout the year.*

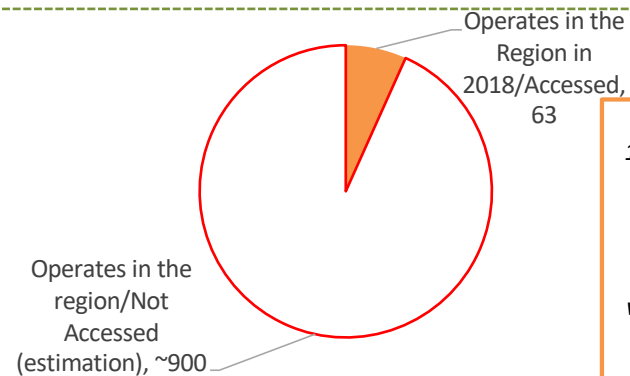
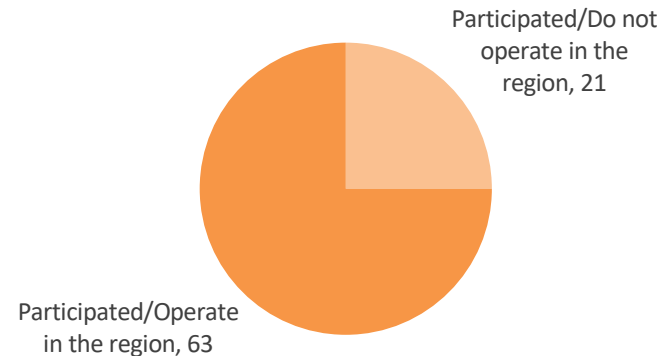
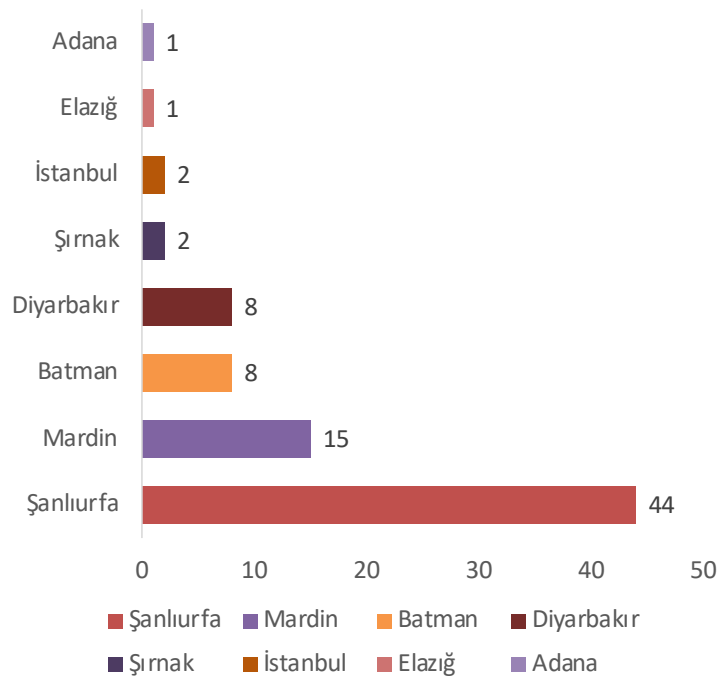
*In return, interviewed labor contractors state that they are more motivated to protect workers' rights and fight against child labor. Their participation in initiatives like contractual work piloting and their stance on child labor validate these claims. However, it is also seen that only a few currently seem willing to change the status quo in other challenging issues, such as working hours and deductions.*

Targets Achieved
In Progress
Targets Unachieved

# In-depth Evaluation – LABOR CONTRACTOR TRAINING

In the aftermath of an extensive mapping project during the 2017 harvest, Olam’s implementing partner, Pikolo, organized an awareness raising training for labor intermediaries in Şanlıurfa and Mardin in January-February 2018.

A total of 84 intermediaries from Mardin, Şanlıurfa and neighbouring cities participated in 1 day of intensive training. 72 participants received İŞKUR certificate after the trainings.



*It is estimated that there are 1000 intermediaries who work with 20-1000 workers in Western Black Sea Olam region. During the 2018 harvest, Olam team kept working to find intermediaries that could not be accessed in 2017.*

# In-depth Evaluation – LABOR CONTRACTOR TRAINING

Labor Contractor trainings covered various topics, such as 'Child labor,' 'Occupational Health & Safety,' 'Agricultural Intermediary Certification' and 'Legal Regulations.' It was observed that intermediaries' learnings on these subjects do not mainly come from these one-time trainings, but rather that long term consultancy services provided by Olam team made differences possible.

**Change in Awareness & Behaviour:** It is certain that there has been an increase in participants' awareness of training topics. Olam's consultancy support also encouraged them to act on their learnings. Interviewed labor contractors credit the Olam and Pikolo teams' consultancy and mentorship in the aftermath of the training sessions for their learnings. They were able to ask any of their questions to Olam's team when needed, even if they were in another city for another commodity at that moment. They experimented with using their İŞKUR certificate when contacting local authorities and making demands. This close cooperation throughout the year prepared both Olam's team and labor contractors for the 2018 harvest: each party knew what to expect and to do when the worker groups arrived in the region.

It should be noted that the areas where labor contractors took action following their learnings were mostly 'safe' issues, such as child labor and improvement of workers' accommodation conditions. Only anecdotal stories were shared with the team to support these claims and even 'model' labor contractors avoided sharing 'sensitive' information such as the number of children in their groups, but it is seen that now topics such as eradication of child labor are consensus issues in the villages thanks to the efforts of various public and private actors in the last years and acting on these issues does not threaten the intermediaries' interests. In contrast, the intermediaries were particularly unwilling to answer questions on subjects such as wages and deductions.

*'We are strong when united. We can achieve the unthinkable.'*

K. is a labor contractor from Mardin-Midyat. His father was also a labor contractor and he started to pass his responsibilities to his son when K. was 14 years old. Today K. can mobilize up to 1000 workers if needed. He brought 700 workers to the hazelnut harvest this year. He is currently considering setting up a private employment bureau with consultancy support from Pikolo.

His path and Pikolo's crossed in 2017, during their mapping project. He was suspicious of their intentions at first but they have become his mentor in time and he started to change his deep-rooted perceptions, habits. He expresses that he has become particularly sensitive about child labor thanks to their mentorship. Also, K. is taking his service fee directly from the garden owners in 2018. He emphasizes that he has the numbers of workers to negotiate with the garden owners, so he could do this and he did. He believes that change at the regional level is possible too if the workers and the intermediaries unite to ask for it.

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## **EVALUATION of FINDINGS**

*In-depth Evaluation of Prioritized Areas  
of Interventions*

***FARMER TRAININGS***

## FARMER TRAINING – Key Result Chain Targets

Outcomes		Outcomes Indicators	Impact	Impact Indicator
Target	(1) Farmer's awareness about the eliminating of child labor and working conditions of seasonal migrants improved.	Indicator 1: # of workers working under contractual agreement	(1) To contribute to reducing child labor. (2) To contribute to improving working conditions.	Indicator 1: # of Children found in the hazelnut gardens.  Indicator 2: # of workers working 8 hours  Indicator 3: # of workers receiving minimum wage without deduction.
Evaluation	Indicator 1: # of workers working under contractual agreement – <b>533 workers, 9 labor contractors and 52 garden owners signed contracts in 2018. It is also learned that out of 533 workers, 42 signed contracts with more than one garden owner. However, interview findings do not suggest a strong causal link between farmer training and motivation to sign a contract.</b>		<p>Indicator 1: # of Children found in the hazelnut garden – <b>8 children were found in the gardens within the scope of this study's garden visits. Interview findings suggest that the rate of working children is declining year by year. However, interview findings do not suggest a strong causal link between farmer training and reduction in child labor.</b></p> <p>Indicator 2: # of workers working 8 hours - <b>None worked 8 hours in 2018 but intermediaries in some regions supported initiatives to end work half an hour earlier.</b></p> <p>Indicator 3. # of workers receiving minimum wage without deduction – <b>66% of workers were employed via a supervisor in the garden visits, and supervisors do not deduct their service fee from workers' wages. However, most of these workers also stated that there will be transportation and food costs-related deductions.</b></p>	

*Olam changed its approach to farmer training sessions in March 2018; it is still too early to observe any social impact in the field as a result of this new approach.*

*This study's findings indicate that any progress at outcome and impact level targets was mostly possible thanks to the combination of Olam's coordinated efforts on multiple fronts. It is difficult to isolate the effects of actions on one front, especially if the steps taken are rather recent.*

Targets Achieved

In Progress

Targets Unachieved



# In-depth Evaluation – FARMER TRAININGS

Deciding that the traditional farmer training method was not working and was unable to contribute to change in the target group, Olam adopted a new training approach in March 2018. While it is too soon to say that new training method by itself has caused or led change in the region, it is clear that the new approach is more suited to create an impact on the target group.

## New training method

- Is interactive and lively,
- Increases participants' level of engagement in the training,
- Facilitates understanding of issues, especially thanks to live demonstrations and participatory activities,
- Encourages participants to ask questions and learn from other participants' inputs,
- Encourages constructive discussions,
- Is tailor-made, as Olam's team considers worker and garden owner profile, context, needs and training records of each community before setting up a training session,
- Targets constant improvement, as the team receives direct feedback from the participants at the end of each session.

***Garden owners easily recall training subjects even after weeks; it was reported to the evaluation team that this was not the case with the old training method.***

***It should be noted that participants are more likely to recall agricultural subjects. Agricultural topics constitute the first module of the farmer training and farmers feel more engaged in these topics as there are numerous participatory activities and their learnings directly touch upon hazelnuts, thus their livelihood.***

***On the social compliance front, working under contract is the topic in which they show the most interest.***



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## **EVALUATION of FINDINGS**

*In-depth Evaluation of Prioritized Areas  
of Interventions*

***NEIGHBORHOOD MOTHER PROGRAM***

## NM Project – Key Result Chain Targets

Outcomes		Outcomes Indicators	Impact	Impact Indicator
Target	(1) 1. Consciousness and awareness in women; encourage their efforts to speak up for their rights. (2) A total of 100 workers will have a better understanding of their legal rights and increased awareness on financial literacy amongst the workers who attended training sessions. (3) Through the activities in Mardin, 10 women from the worker community-built knowledge and skills to act as leaders in their community.	Indicator 1:# women workers increased their gender awareness and leadership skills.	(1) Women workers and their children will have improved their communication; the development and educational needs of the children (especially at 0-6 age) will have been better responded; the households' awareness and access to different services and programs have increased.	Indicator 1: # of women referred locally to available services. Indicator 2: # of children referred to education, health services.
Evaluation	Indicator 1: # women workers increased their gender awareness and leadership skills. – <b>105 women workers participated in the project activities carried out in the leadership of 8 Neighborhood Mothers according to KEDV records. 'Labor Rights', 'Financial Literacy' and 'Women's Empowerment' training sessions were delivered following a detailed need assessment activity.</b>		Indicator 1: # of women referred to locally available services – <b>KEDV team shared summary findings of need assessment for 105 women and their household members with the local authorities but potential referrals were not finalized by the project end time. It was seen that most of these households in Kiziltepe were already in touch with some of the local authorities and benefitting from social welfare aids. This was considered to be a key lesson learned regarding the target group for future projects.</b> Indicator 2: # of children referred to education, health services – <b>17 children were to be referred to daycare facilities; their referrals were expected to take place after the end of the project.</b>	

*KEDV's Neighbourhood MotherProgram was launched within the scope of FLA-USDOL Project efforts. Therefore the program ended before the project culmination in June 2018. The program was active for 4 months in Mardin and selected community leaders worked closely with 105 women. KEDV's own reports as well as FLA Monitoring and Evaluation notes suggest that women workers' awareness of labor rights, financial literacy, and gender was increased within the framework of this program. Also, it is seen that outcome and impact targets were mostly met. However, the evaluation team was only able to access a very limited number of the beneficiaries in the field during the 2018 harvest and collected information suggests that there are lessons to be drawn in terms of sustainability.*

Targets Achieved
In Progress
Targets Unachieved

# In-depth Evaluation – NEIGHBORHOOD MOTHER PROGRAM

The findings of this study suggest that the program mobilized the community in a short time and beneficiaries who traveled to harvest region in 2018 have already started to act on their learnings.

**A key target group to work with** - 58% of the workers interviewed in the gardens within the scope of this study were women. These women work double shift during the harvest: they pick hazelnut during the day and take care of domestic chores in the evening for the family/the group. Their specific needs and problems are only vocalized during one-on-one interviews and it is a feat in itself to access them and find a suitable time to interview them given their busy schedule. It is clear that this is a target group that requires special attention and thus, the program stands on a solid base.

**Successful in terms of awareness raising** - Interviewed program participant (Neighbourhood Mother) expressed to have higher awareness, particularly on labor rights issues and she expresses that she can say the same for all beneficiaries. Working hours, role and responsibility of labor contractors and working under contract were the highlights of the program, according to her. The main take away of the program was 'to learn that they have rights too.'

**Signs of behavioral change observed too** - Per the accounts of the interviewed Neighbourhood Mother, beneficiaries already started to act on their learnings during the 2018 harvest. 2 program beneficiaries and their family members have been working under a contract by the time of the fieldwork. It was also learned that some women started to count their own work days (traditionally the head of the family takes care of this for all working family members) to calculate the sum of their own wages at the end of the harvest season.

**Interconnected with other components of Olam's Social Program** – Olam and implementing partners KEDV and Pikolo worked in collaboration while the program was active in Mardin. Within the scope of the program, KEDV worked with two labor contractors to access potential beneficiaries. These labor contractors were mapped by Pikolo and one of them participated in Pikolo's training. 2 beneficiaries who worked under contract this year were members of his group. The same labor contractor's daughter A. became a Neighbourhood Mother and highly contributed to program efforts in Mardin. By the time of the fieldwork, Olam was planning to open a toy library at the Esmahanım Safe Space and to employ A. as the person in charge. A. was also slated to conduct a needs assessment exercise with workers at the selected locations.

# In-depth Evaluation – NEIGHBORHOOD MOTHER PROGRAM

Olam seems to want to maintain the program, but there are certain factors to take into account to ensure its better functioning.

**Extending training of trainers over a longer period of time, followed by mentoring** – Interviewed community leaders stated that the program was a door to a new world for them (community leader women) and they had only a couple of weeks to prepare for it. It took some time to fully grasp some parts of the program content (particularly information about labor rights). Furthermore, they were not taken seriously as young women by the community members during their first house visits, which was a demotivating factor. They started to feel motivated again once an older and experienced KEDV trainer started to closely mentor them.

**Diversification of beneficiary access points** - 105 women and 8 community leader women were accessed with the help of 2 labor contractors in the region; these labor contractors were mapped by Pikolo in 2017. All beneficiary women and their families were working with these labor contractors, often close or distant relatives of theirs. It is understood that one of the labor contractors was hospitalized prior to the 2018 harvest and his group did not travel again to the harvest region. 7 community leader women and nearly half of the beneficiaries were members of his group. As a result, according to KEDV data, only 58% of the beneficiaries participated in harvest activities in 2018.

**Reconsidering beneficiary criteria against the risk of conflict of interest** - Community members were initially suspicious of the project team's intentions and unwilling to become program beneficiaries. KEDV had to reach the community via the labor contractors to establish trust, yet there were only 2 mapped labor contractors in the region. As the Mother Project's time limitations did not allow for a change of location and KEDV has already established connections with the local authorities in Mardin, it was decided to keep working in Mardin-Kızıltepe. Due to mentioned challenges and limitations, only 8 young women accepted to work in the program as Neighbourhood Mothers. One of them is the daughter of a labor contractor and a supervisor herself. The FLA-USDOL team interviewed different stakeholders while the program was active in Mardin and it was concluded that this particular participant highly performed as she was already an influential figure in the community. However, the evaluation team's observations during the harvest indicate that such figures may feel torn between the clashing interests of their beneficiary groups and their family.



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# **EVALUATION of FINDINGS**

*Brief Evaluation of Renovation Projects*

# Brief Evaluation of RENOVATIONS

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) To contribute to providing decent living standards for seasonal migrant agriculture workers, labor contractors and children. (2) To contribute to creating a safe area for children of seasonal migrant worker families.	Indicator 1. # of children of workers who have access to clean water, electricity, proper toilets and bathroom;  Indicator 2. # of children who stay at home and do not go to the gardens due to provided shelter facilities.
Evaluation	<p><b><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 garden owners and cannot be quantified.</i></b></p> <p><b><i>Workers staying at the renovated houses all stated that they are satisfied with the shelter facilities provided and they now have access to basic needs such as clean water, electricity, proper toilets, and bathroom. Additional appliances provided such as a refrigerator and washing machine were especially appreciated. Their testimony signals an improvement in the standard of living conducive to improved health and well-being of the family, especially the children.</i></b></p>			

Targets Achieved
In Progress
Targets Unachieved



# Brief Evaluation of RENOVATIONS

Accommodation conditions was a major source of complaint at the counterfactual points. Workers expressed that they live in 'degrading conditions' and 'they just hang on because they need the money'.



In comparison, Olam's renovation projects are shown as best case examples in the region. The projects mostly aimed at an overall transformation of the selected houses.





# Brief Evaluation of RENOVATIONS

Renovations are quick impact projects that boost the motivation of several harvest actors. The drastic transformation and improvement of the renovated houses was a topic even in neighboring villages and motivated other garden owners in the region to take steps to improve the living standards for their own workers.

It was also seen that these projects created an atmosphere of goodwill between the owners of renovated houses and the workers.

**General Level of Satisfaction:**  
High

Workers are highly satisfied with the general conditions of renovated houses and facilities. It is thought that these houses bridge an emotional and psychological gap between garden owners and workers. These two harvest actors' accommodation conditions seem more or less similar now and workers feel that they are treated as humans and equals.

It is seen that the garden owners fully embraced the renovation projects and some even worked to improve conditions beyond the project targets. According to observations and accounts of the Olam team, this is partly due to the fact that they paid a third of their house's renovation expenses.

**Effect on Their Daily Life: Positive**

Renovated houses are perceived to be secure places and offer a standard of living adequate for the health and well-being of the family. Beyond these, workers especially appreciate that renovated houses give them more physical space for dining, chatting and relaxing as a group after long and tiring work days. In a garden owner's words, this is a need for them too as their daily interactions as a group remind workers of their home, creating a sense of familiarity and comfort.

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

In this sense, renovated houses are perceived to be safe spaces to leave children behind. Parents feel secure that their children will be physically safe in such environments. Moreover, the 'homely atmosphere' provides a sense of comfort both to children and their careers.

**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.

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 – Counterfactual vs. Intervention Points

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

Having a control group added another dimension to this study. The evaluation team found out that at **counterfactual points, the level of awareness on key issues such as child labor, working hours and wages was similar to the level of awareness at intervention points. However, in the absence of company program's regular checks and incentives that encourage deeper involvement in the social program, serious non-compliance cases are observed at counterfactual points. Children's rate within the worker groups at counterfactual points were more than triple that of the rate of children at intervention points. Furthermore, in the absence of a safe space, extremely challenging accommodation conditions aggravated the situation of especially of younger children who are deemed unfit to work and have to stay at home.**

**In terms of working conditions, it was observed that minimum standards established by the local commissions in terms of working hours and wages are also respected at counterfactual points but there is also strong resistance to any possible improvements on these issues. Meanwhile issues such as mitigating health and safety risks in the gardens and improving the living conditions of workers are completely off the picture at counterfactual points.**

## Conclusion – Evaluation of Olam’s Social Program

In light of information collected at counterfactual points, it can be said that Olam’s Social Program is building at the intervention points a safety net encompassing all key issues for the workers. at the intervention points.

One of the main findings of this study is that the **different components of Olam’s Social Program complement each other and work in harmony. As such**, the progress observed in the field is the result of a combination of efforts on various fronts. Even though some activities fall under ‘in progress’ and ‘targets unachieved’ status according to their individual evaluations in this report, it should be emphasized that they still contribute to the greater objectives of the social program in one way or another.

It is understood that one of the key objectives of Olam’s Social Program for the 2018 harvest was piloting the concept of workers working under a contract. Different activities carried out with workers, labor contractors and garden owners bore fruit and **533 workers, 9 labor contractors, and 52 garden owners signed contracts in 2018. Out of 533 workers, 42 signed contracts with more than one garden owner.** It should be noted that the FLA-USDOL project targeted to pilot working under contract in 2017; this turned out to be an unsuccessful attempt due to concerns of all harvest actors and short time frame. It is apparent that working simultaneously with all harvest actors for a period of 12 months created a difference in 2018. **This study’s findings also draw attention to the positive effects of the Olam team’s continuous follow-up and consultancy efforts. It is seen that one-time training sessions have very limited effect and follow-up is essential.**

## Conclusion – Evaluation of Olam’s Social Program

It is also clear that **follow-up means additional work load** for the social compliance team and **Olam is also planning to introduce new implementing partners** in the field in the following months. While the introduction of new implementing partners would certainly contribute to the efforts of all involved parties, findings of this study show that at least a period of 6 months is needed for a new partner to delve into the dynamics of the hazelnuts harvesting world and gain the trust of its actors to establish solid relations. Monitoring and follow-up the workload has been nearly fully on Olam team’s shoulders heretofore. As cooperation with the implementing partners deepens and the partners accumulate experience, collaboration on this front may increase.

Going beyond the interconnectedness of Olam’s efforts and focusing on individually evaluated intervention areas, it is seen that **Renovations and the Neighborhood Mothers Program stand out as ‘targets achieved’ intervention areas. Renovations is a particularly successful, quick impact project** and it has the potential to be a model project even for the neighboring villages. It is observed that efforts on this front did not just improve the living standards of families and children, but it also increased the garden owners’ involvement in Olam’s Social Program.

**As for the Neighborhood Mothers Program, outcome and impact level targets were achieved but it has been problematic to establish the program’s link with the harvest.** There are valuable lessons to be drawn from this experience in the name of sustainability.

## Conclusion – Evaluation of Olam’s Social Program

As for the labor contractor training sessions and safe space activities, they fall under ‘in progress’ category for different reasons. It should be noted that **Olam started to work closely with the labor contractors only within the last year and project targets touch upon complex, structural problems that require all harvest actors’ consensus and government-level will and action. Nonetheless, beneficiaries’ willingness to cooperate on issues such as contract- making and child labor show that considerable progress has been made with this target group, especially because of the to the consultancy service provided at the conclusion of the training sessions.**

**In contrast, the Safe Space is one of the most established intervention areas of Olam’s program and despite the lack of substantial data, all actors credit the Esmahanım safe space for the reduction of child labor in the region. However, the evaluation team observed that the safe space could not actualize its full potential due to limited resources and the inability of the current system to attract high-risk older children.**

Lastly, the evaluation team decided that farmer training sessions as an intervention area fall between the ‘targets unachieved’ and ‘in progress’ categories as an intervention area since new training methods have been adopted very recently to create substantial change in the field and there was only a weak link between the training sessions and any progress made in the relevant issues. However, it is clear that the new training method is much more engaging compared to the old style of training and carries the potential to be impactful.

# Recommendations

## **On Safe Space:**

- Reconsider resources that can be mobilized to boost the safe space's capacity to host more children (especially the higher risk group/older age children) and to fix infrastructure problems that endanger the daily functioning of the school;
- Clarify roles and responsibilities of the project partners and appoint key contacts for diverse needs that may arise during the term;
- Focus on monitoring and evaluation activities, setting yearly targets and target indicators so that:
  - A regular attendance follow up system can be set up;
  - Progress on key issues such as hygiene education or nutrition can be followed up;
  - Improvement points in the system can be identified.

## **On Labor Contractor Training:**

- Continue to scan the field to reach more labor contractors in the supply chain and, beyond one-time training sessions, provide long term consultancy to those reached.

## **On Neighbourhood Mothers Program:**

- Extend training of women community leaders over a longer period of time and provide mentoring to participants after the training;
- Diversify beneficiary access points;
- Reconsider beneficiary criteria against the risk of conflict of interest.

## **On Provision of Mobile Sanitary Facilities**

- Determine transparent criteria for beneficiary selection – even though large scale house renovation activities ended (this was a one-shot intervention), Olam continues to provide mobile sanitary facilities to model harvest actors and to points where non-compliance is observed. Olam should publicize beneficiary selection criteria in as this component has become a plus for Olam's Social Program and it creates expectations for all parties concerned.

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## **ANNEX**

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



## 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 security that they shall not be punished or prejudiced for doing so.	Noncompliance	

# IEMs Results – 1. Employment Relationship (2016 & 2017)

		2016	2017
Human Resource Management System	ER.1.1	In compliance	Noncompliance
	ER.2.1 (Progress Benchmark)	In compliance	In compliance
	ER.2.1.1(PR)	In compliance	In compliance
Recruitment and Hiring	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 compliance	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
Terms and Conditions	ER.9.1	Noncompliance	Noncompliance
	ER.9.2	In compliance	Noncompliance
	ER.9.2.1	In compliance	Noncompliance
	ER.9.2.2	In compliance	N/A
	ER.9.2.3	In compliance	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	In compliance	Noncompliance
	ER.12.1	In compliance	Noncompliance
	ER.12.1.1	In compliance	In compliance
	ER.12.2	In compliance	N/A
	ER.13.1	Noncompliance	Noncompliance
	ER.13.2 (PR)	In progress	In progress
	ER.13.3 (PR)	In compliance	In progress
Administration	ER.15.1	In compliance	In compliance
	ER.15.2	In compliance	In compliance
	ER.15.2.1	Noncompliance	Noncompliance
	ER.16.1	In compliance	Risk of noncompliance
	ER.16.2	Noncompliance	In compliance
	ER.17.2 (PR)	Not initiated	In progress
	ER.17.3 (PR)	In compliance	In compliance
	ER.17.4 (PR)	In compliance	In compliance
Worker Involvement	ER.18.1	In compliance	In compliance
	ER.18.2 (PR)	In compliance	In progress
Right to Organize and Bargain	ER.19	In compliance	In compliance

		2016	2017
Work Rules and Discipline	ER.20.1	Noncompliance	Noncompliance
	ER.20.2	In compliance	Noncompliance
	ER.20.3 (PR)	Noncompliance	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
	Access to Training for Family Members	ER.21	In compliance
HSE Management System	ER.24.1.	Noncompliance	Noncompliance
	ER.24.2 (PR)	In compliance	In compliance
	ER.24.3	In compliance	In compliance
	ER.24.4 (PR)	In compliance	In compliance
	ER.24.4.1 (PR)	In compliance	In compliance
	ER.24.4.2 (PR)	In compliance	In compliance
	ER.24.4.3 (PR)	In compliance	In compliance
	ER.24.4.4 (PR)	In compliance	In compliance
	ER.24.4.5 (PR)	In compliance	In compliance
	ER.24.4.6 (PR)	In compliance	In compliance
Grievance Procedures	ER.24.5 (PR)	In compliance	In compliance
	ER.25.1 (PR)	In compliance	In compliance
	ER.25.2 (PR)	In progress	In progress
	ER.25.3	In compliance	In compliance
	ER.25.4	In compliance	In compliance

# Employment Relationship

**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 in the farm at the time of their employment and work towards collecting and maintaining all documentation necessary to confirm and verify date of birth of all workers, including long term and casual workers.
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.
ER.5.3	Workers shall not be engaged to work in a farm by a family member, friend, or associate in order for that family member, friend or associate to receive continuing remuneration, consideration, or any other return from the employer. This prohibition does not refer to normal references, referral bonuses or standard employment recruitment practices.
	<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;

# Employment Relationship

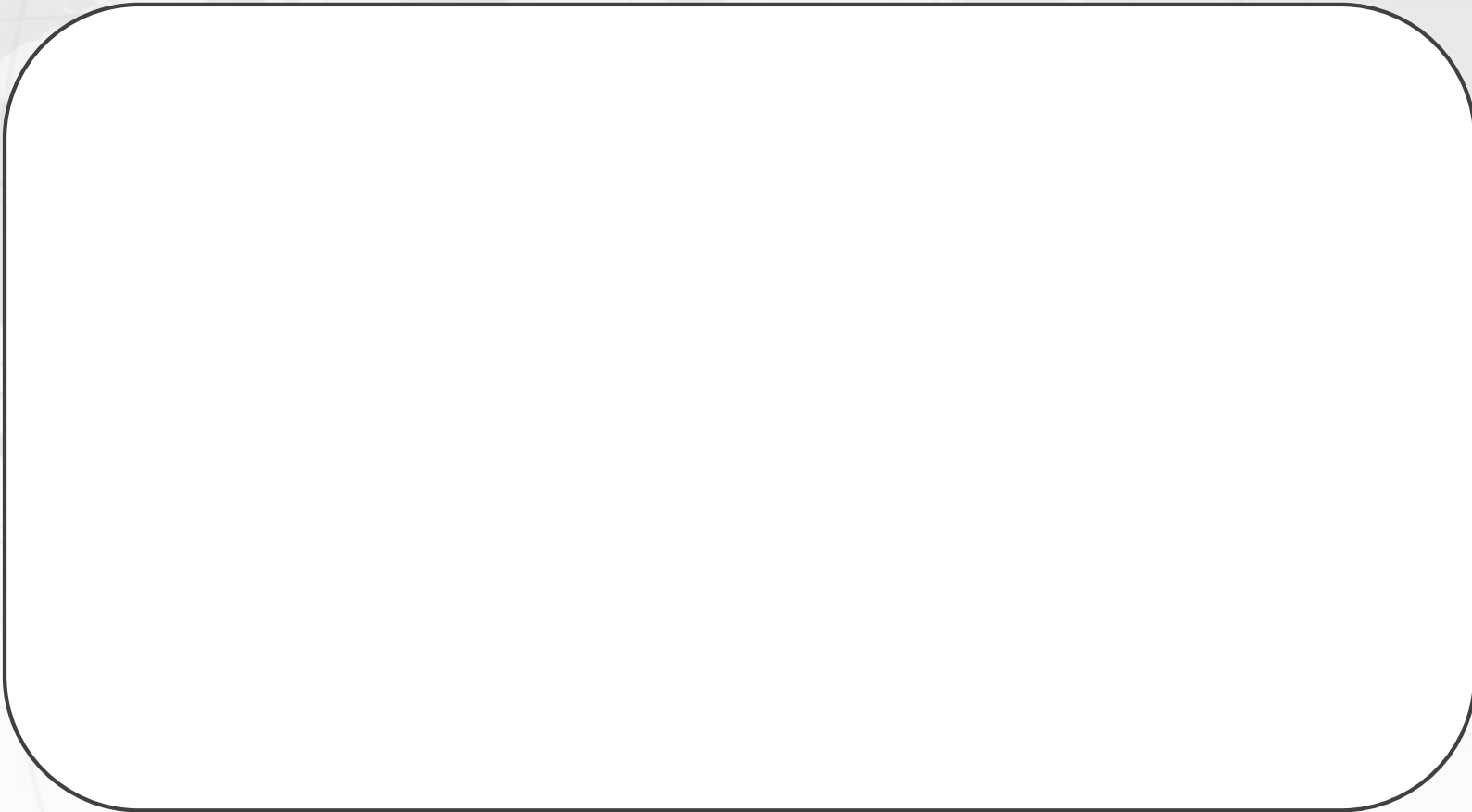
**FLA BENCHMARKS  
'NON-COMPLIANCE' AREAS  
(2014 - 2017)**

	<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.
	<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 posted in local language(s) throughout the workplace's common areas or in the surrounding community. In the case of workplaces with informal labor structures, these communication and awareness raising activities could be done with support from supply chain intermediaries such as cooperatives, organizers, tier one suppliers or the participating company.
	<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>Free Disposal of Wages</b>
ER.16.2	Wages must be paid on regular working days and in principle at or near the workplace. Workers must be free from any coercion to make use of enterprise or works stores.
	<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

- Olam's efforts are especially visible with respect to **'Communication'** and **'Worker Involvement'** issues. Workers and male farmers received training sessions in 2018 during which they were informed about social compliance issues and OHS measures. Olam also separately delivered training sessions to female farmers and farmer wives through FISA training sessions. The latter training sessions were not evaluated within the scope of this project.
- Furthermore, 2018 was the year that Olam piloted **working under contract** with willing workers, garden owners and labor contractors. 533 workers, 9 labor contractors and 52 garden owners signed contracts with workers in that year. Even though most of these workers did not receive information about terms and conditions of their work before leaving their city of origin, in theory they were informed about certain key issues -- such as wages -- because of the contracts. Wages were a particularly confusing and unclear subject for the workers in the region in 2018 due to changes in minimum wage calculations. In this sense, the contracts cleared a key question mark at the beginning of the work.
- It was observed that workers were the least well-informed party about the content of the contracts. It was also seen that certain areas of conflict, such as working hours and intermediary payments were intentionally left blank by the parties in the contracts. It is understood that the contracts were a very sensitive issue for all parties and while certain benefits of signing had to be emphasized, points which can be considered threats to interests of garden owners and labor contractors necessarily had to be left blank to convince these parties to at least pilot the contracts.
- According to the findings of this study, 34% of workers (those working with labor contractors) interviewed in the gardens still, pay 10% of their wages to labor contractors and those who did not sign contracts in 2018 were poorly informed about the terms and conditions of their work. In this sense, some of the key non-compliance issues identified in the 2014-2017 FLA IEMs (especially issues related to **'Employment Agency / labour Contractors'** and **'Employment Terms'**) remain as areas that require close supervision.
- However, one should draw attention also to **good examples like Gümüşova** . Garden owners in this region stated that they prefer to work with supervisors who do not deduct their service fees from workers' daily wages.
- Lastly, an issue worth mentioning under this heading is **'Grievance Procedures'**, which is a topic that came to the forefront especially in the last 2 years. Even though a free company hotline is operational and communicated to the workers during the training sessions, workers primarily contact intermediaries to handle grievances. Accordingly, the recall rate of 'Grievance Procedures' as a training topic is very low (7% recall it).

## *Olam CAP – Employment Relationships*



## IEM Results – 2. Forced labour

	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

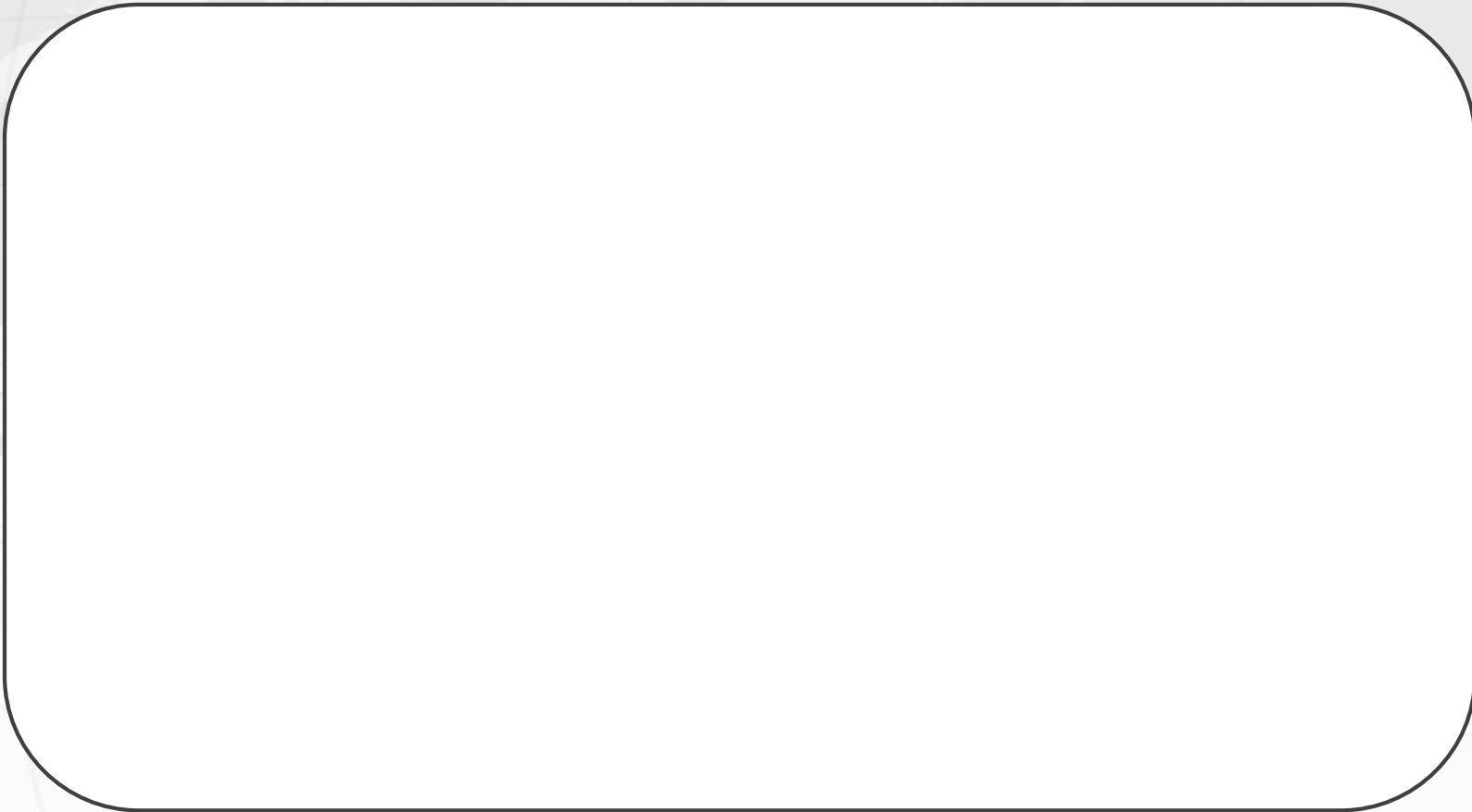
<b>FLA BENCHMARKS 'NON-COMPLIANCE' AREAS (2014 - 2017)</b>		<b>Employment Terms/Prohibitions</b>
	<b>F.4</b>	There can be no employment terms (including in written or verbal contracts or any other instruments or in any formal or informal recruitment arrangements) which specify that workers can be confined 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 separate contract with no linkage to other members.



## General Picture in 2018

- While none of the workers interviewed complained about forced labor, it is 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 owners side. However, it is also observed that they are dependent on the labor contractor or the supervisor 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.
- The majority of 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 who are 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 intermediaries and intermediaries pay to the head of the family.**
- It should be noted that the majority of workers had worked in hazelnut harvesting before and they expressed that they already knew about the conditions and possible risks (especially in terms of wages and payments) before leaving their cities of origin.

## *Olam CAP – Forced Labor*



## ITEM Results – 3. Child labour

	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	
<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	Noncompliance	In compliance
<i>Right to education</i>	CL.4.1 (PR)	In compliance	In progress
<i>Young Workers</i>	CL.5	Noncompliance	In compliance
	CL.6.1	Noncompliance	Noncompliance
	CL.6.2	Noncompliance	Noncompliance
	CL.7	Risk of noncompliance	Noncompliance
<i>Apprenticeships and Vocational Training</i>	CL.8.1 (PR)	In compliance	N/A
	CL.8.2 (PR)	In compliance	N/A
<i>Children on Premises</i>	CL.9	In compliance	Noncompliance
<i>Removal and Rehabilitation of Child Laborers</i>	CL.10.1	In compliance	Risk of noncompliance
	CL.10.2 (PR)	In compliance	In progress

## Common Non Compliance Areas Through the Years

<b>FLA BENCHMARKS 'NON-COMPLIANCE' AREAS 2014 &amp; 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>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.
		<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</b>	
CL.10	If a child laborer is found working on the farms, the grower and the company shall ensure that the child is immediately removed from the farm and is rehabilitated and brought into the mainstream school system. The grower and company will make efforts to make this rehabilitation sustainable.	

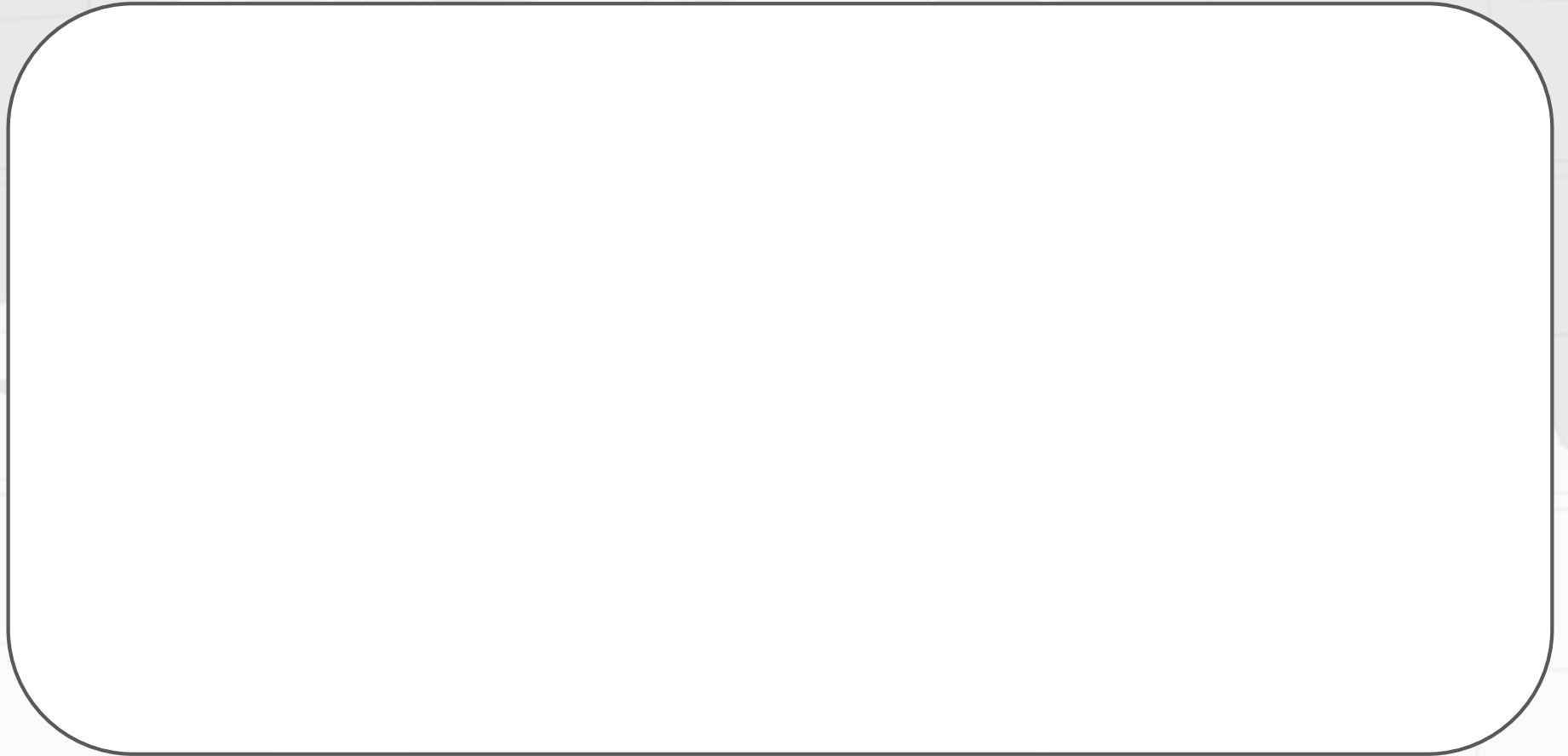
## General Picture in 2018 - Child labour

- According to the 2014 IEM findings, children constituted 8% of the labor force in Sakarya villages. This single digit rate can be considered exceptional in itself considering the findings regarding the concerning counterfactual points. Furthermore, according to this study's findings, this rate declined further and is 6% in 2018 at the intervention points.
- The evaluation team's observations in the field and secondary sources show that **safe spaces play key roles in the decline of child labor in the region**. Unfortunately, available data does not allow calculating the exact impact of the safe space. 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 and compliance areas in the last 2 years.
- Olam collaborated with the ILO in supporting the Esmahanım safe space for the last 4 years. According to observations, limited resources hindered access to the target group. **Securing the attendance of older children seems particularly challenging** for the safe space. While registration numbers suggest increased access by older age groups, attendance records suggest otherwise. In this sense establishing a follow-up system stands out as a primary need. As Olam and teachers only have in their hands the power of persuasion, it is important to equip the follow-up team with all needed resources.

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

- Taking the considerably high rate of young workers in the labor force into account, working conditions of young workers stand out as a critical topic. For the last 4 years (2014-2017), employment of young workers was regularly marked as an area of non-compliance by the FLA IEM audits. 2 main issues have stood out through the years: **young workers work excessive 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 overtime remains a persistent problem of young workers.** It was 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 did not detect any young worker undertaking tasks which can be classified as hazardous (such as carrying hazelnut sacks). A limited number of young workers stated that they received training and brochures informing them about occupational health and safety (OHS) from the Olam team.

*Olam CAP – Child Labor*



## IEM Results – 4. Harassment or Abuse

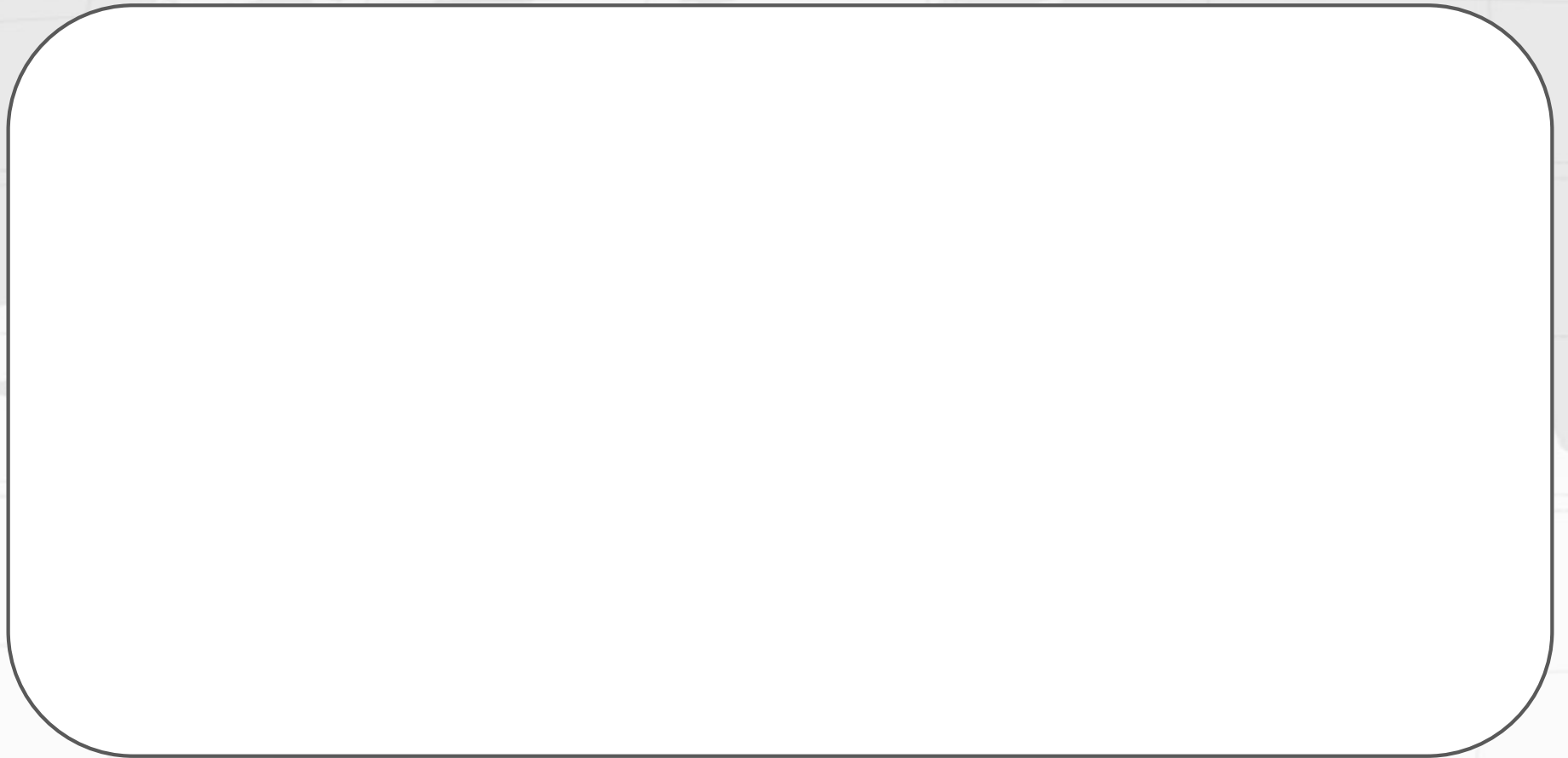
	2014	2015
H&A.1 General Compliance Harassment and Abuse		
H&A.2 Discipline/Fair and Non-discriminatory Application		
H&A.3 Discipline/Worker Awareness	Noncompliance	Noncompliance
H&A.4 Discipline/Training		
H&A.5 Discipline/Monetary Fines and Penalties		
H&A.6 Discipline/Access to Facilities		
H&A.7 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
<i>Violence</i>	H/A.13	In compliance	In compliance
	H/A.8.1	In compliance	Non compliance (1 case)
	H/A.8.2	In compliance	Non compliance (1 case)
<i>Sexual Harassment</i>	H/A.8.3	In compliance	In compliance
	H/A.9.1	In compliance	In compliance
	H/A.9.2	In compliance	In compliance
	H/A.9.3	In compliance	In compliance
<i>Security Practices</i>	H/A.9.4	In compliance	In compliance
	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 through the years. Since the evaluation team did not collect data on this specific issue, this report does not evaluate this area.**



## *Olam CAP – Harassment or Abuse*



## 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	Noncompliance	In compliance
	ND.2.3	In compliance	In compliance
<i>Compensation Discrimination</i>	ND. 3	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	Noncompliance	In compliance

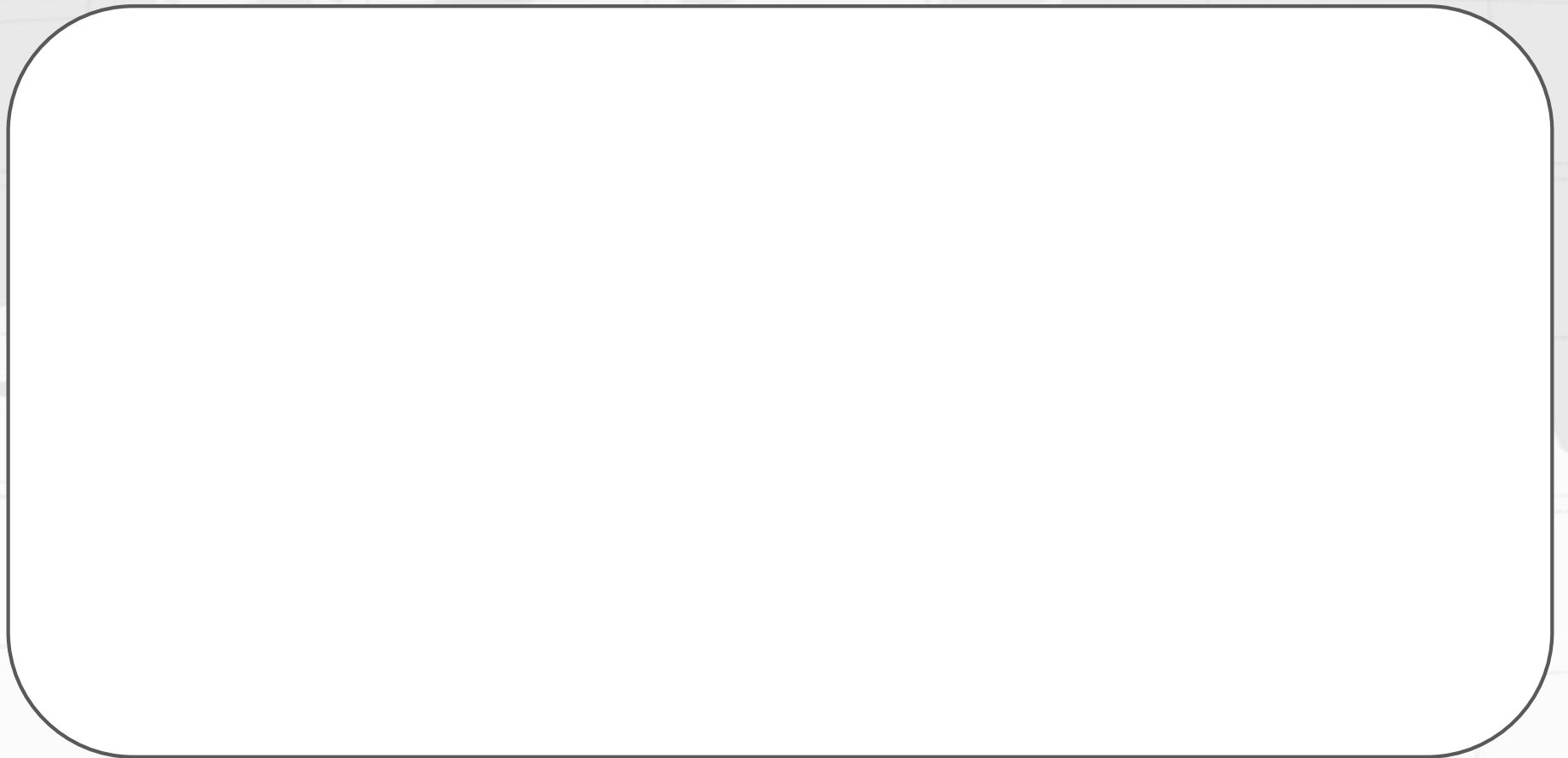
## Common Non Compliance Areas Through the Years

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' daily wage was expected to be around 67.5TL in 2018 (without 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 **the evaluation team did not come across local workers at the intervention points** and it can be concluded that information regarding local workers' wages is mostly second hand.

## *Olam CAP – Non Discrimination*



## 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		
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		
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		

## IEM Results – 6. Health, Safety and Environment (2017)

		2016	2017
<i>General Compliance</i>	HSE.1.	In compliance	Noncompliance
<i>Documents, Permits and Certificates</i>	HSE.2 (PR)	Not Initiated	In progress
	HSE.3.1	In compliance	In compliance
	HSE.4 (PR)	Not Initiated	In progress
<i>Evacuation Requirements and Procedure</i>	HSE.5.1 (PR)	In compliance	Not Initiated
	HSE.5.2	In compliance	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)	In progress	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	In compliance	Risk of noncompliance
	HSE.9.2.1	In compliance	In compliance
	HSE.10	In compliance	In compliance
	HSE.11.1	In compliance	In compliance
	HSE.11.2	In compliance	In compliance

		2016	2017
<i>Protection Reproductive Health</i>	HSE.12.1	In compliance	In compliance
	HSE.12.2 (PR)	In compliance	In compliance
<i>Infrastructure</i>	HSE.13 (PR)	In compliance	N/A
	HSE.17.1	In compliance	Noncompliance
	HSE.17.2 (PR)	Not Initiated	In progress
	HSE.19 (PR)	Not Initiated	In progress
	HSE.21 (PR)	In compliance	In progress
	HSE.22 (PR)	In compliance	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 compliance	In progress
	HSE.16.2	In compliance	In compliance

## Common Non Compliance Areas Through the Years

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

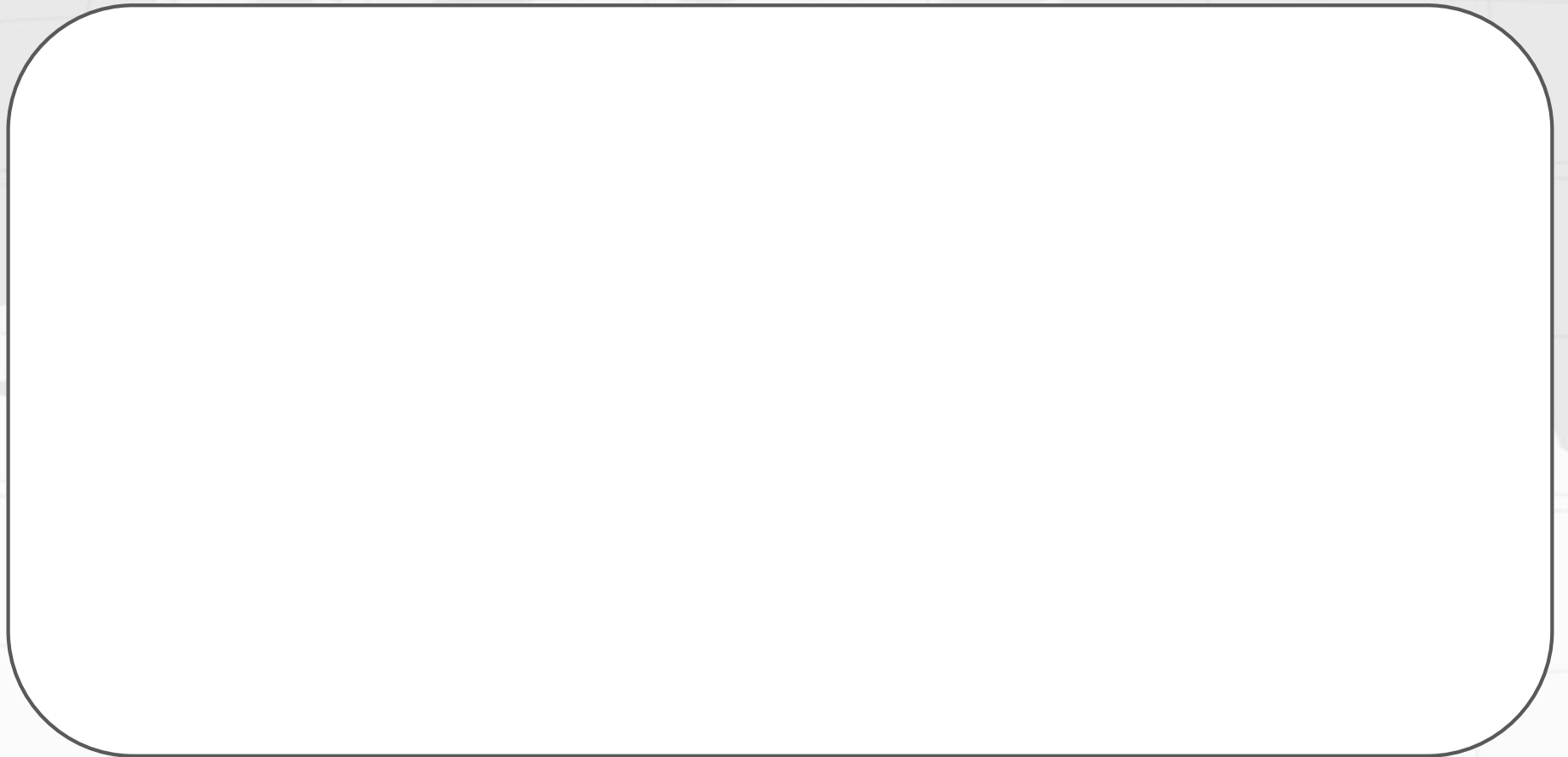
	<b>General Compliance - Benchmarks</b>
HSE.1.	Employers shall comply with all national laws, regulations and procedures concerning health, safety, and the environment.
	<b>Access to Water and Sanitation</b>
HSE.17.1	Safe and clean potable water for drinking shall be freely available at all times, within 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 sources of complaint, it is also observed that Olam has been taking steps in the sub-areas below:
  - **Safety Equipment** distribution – Olam teams visited gardens and points of accommodations to inform workers about health and safety issues and distribute PPE. During the garden visits, 2 worker groups stated that they received information on OHS issues and PPE from Olam. However, members of these worker groups were unable to recall the content of the training sessions.
  - **Infrastructure & Mobile Facilities**– Even though workers continue to complain about sanitation facilities in the gardens and points of accommodation Olam is trying to solve this problem by locating mobile toilets in selected gardens Olam is also giving information during training sessions about easy ways of making pit toilets in the gardens.

## *Olam CAP – Health, Safety and Environment*



## 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	In compliance	Noncompliance
	HOW.1.2	Noncompliance	Noncompliance
	HOW.1.3	Noncompliance	Noncompliance
	HOW.1.4	In compliance	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)	In progress	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)	In progress	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

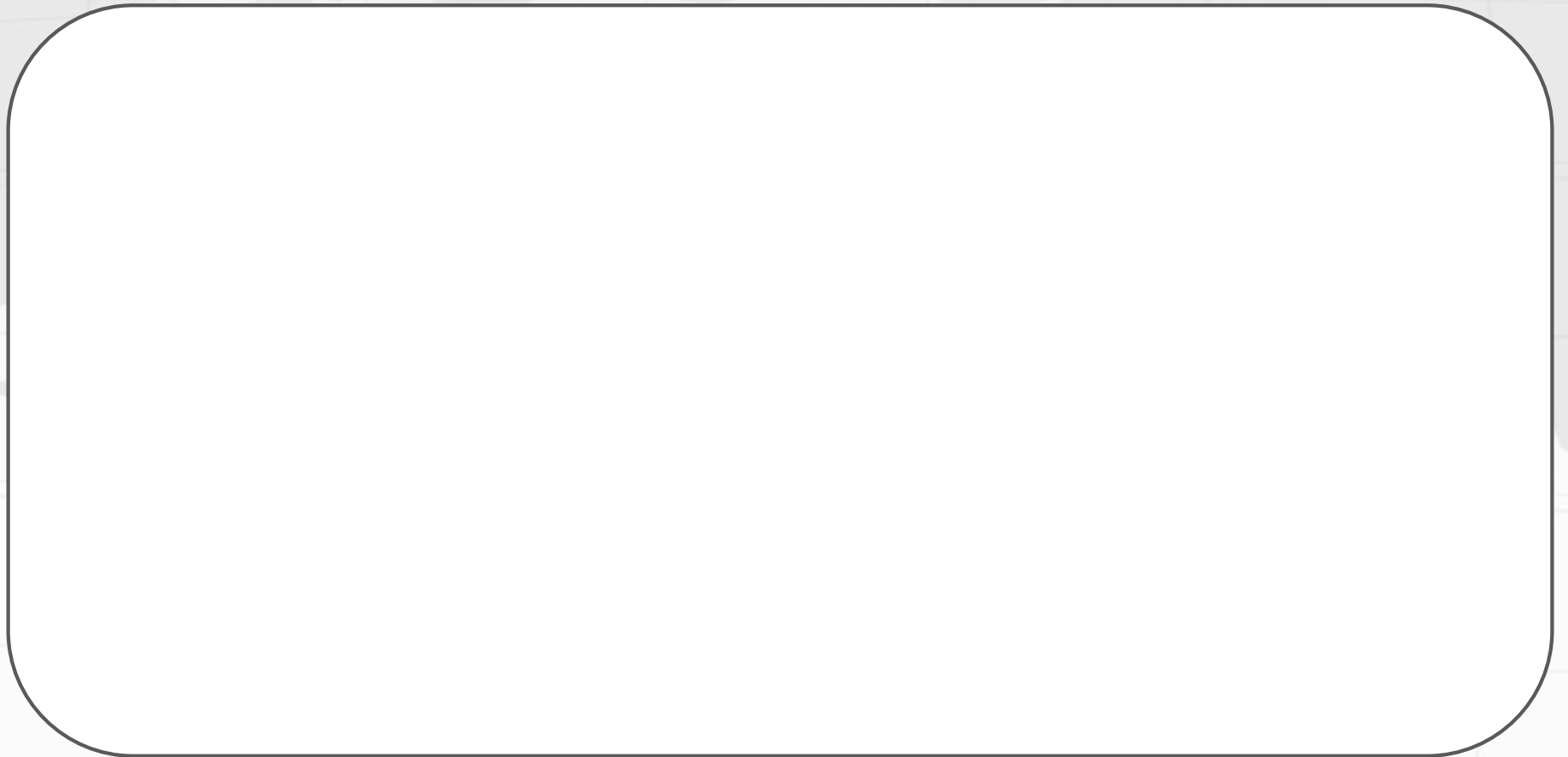
## FLA BENCHMARKS 'NON-COMPLIANCE' AREAS (2014 - 2017)

<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 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 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** the main problem in 2018. All seasonal migrant workers (including young workers) outside of Gümüşova district 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 to earn as much as possible, because they do not have paid rest day.
- 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 most common complaint of all workers and they demand change in this subject.
- **Gümüşova district is an exceptional case** that proves that change is possible even in areas that are very close to the interests of harvest actors. In 2017, intermediaries and garden owners in this region came together to discuss common problems. With the support of the district governor, it was decided to shorten working hours by a half hour and finish work at 6.30pm. A half hour may seem like a small and symbolic change, but one should consider and compare this attitude with strong negative reactions of garden owners in other districts.

## *Olam CAP – Hours of Work*



## 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>		

## 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	In compliance	In compliance
	C.1.4 (PR)	In progress	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)	In compliance	In progress
	C.2.6 (PR)	In compliance	In progress
Farmer/Porducer Income	C.3	In compliance	N/A
	C.4 (PR)	In compliance	In progress
Wage Payment and Calculation	C.6	In compliance	In compliance
	C.7.1	In compliance	In compliance
	C.7.2	In compliance	In compliance
	C.7.3 (PR)	Not Initiated	In progress
	C.7.4	Not Initiated	Not Initiated
	C.7.5	In compliance	Noncompliance
	C.8.1	In compliance	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	In compliance	N/A
	C.11.1.5	In compliance	Noncompliance
	C.13 (PR)	In compliance	In compliance
Fringe Benefits	C.12.1	In compliance	In compliance
	C.12.2 (PR)	In compliance	Not Initiated
	C.12.3	Risk of noncompliance	In compliance
	C.12.4	Risk of noncompliance	In compliance
	C.12.5	Risk of noncompliance	N/A



# Common Non Compliance Areas Through the Years

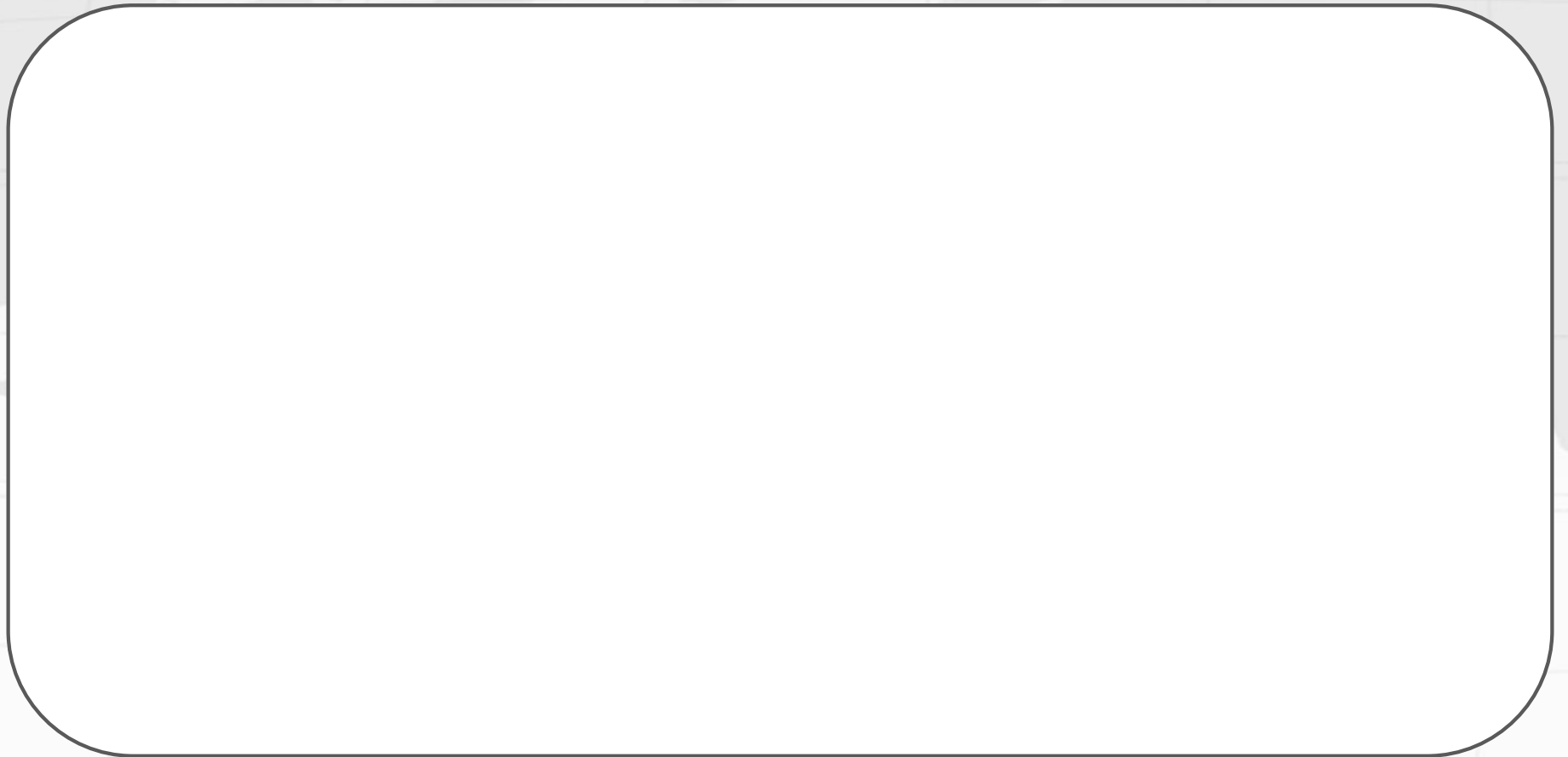
## FLA BENCHMARKS 'NON-COMPLIANCE' AREAS (2014 - 2017)

	<b>General Compliance - Benchmarks</b>
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.
	<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 minimal 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 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 encountered in the field, though efforts in these subjects are visible too:
  - 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' fees from wages cause workers to earn below the minimum legal wage. It should be noted that **a large part of the interviewed sample was working with supervisors**, who receive their fees directly from the garden owners, and therefore they do not make deductions from workers' pay. Especially, **garden owners in the Gümüşova district stand out as role models** since they only work with supervisors.
  - Besides the minority who signed contracts with garden owners by the time of the fieldwork, the majority of interviewed workers did not know the exact wage they would receive in 2018 for their work in the harvest. **The evaluation team learned that more workers signed contracts after the end of fieldwork, as the harvest continued into September.**
  - The daily wage calculation of the Ministry of Labor and Social Security is based on 8 hour working day, while the working day harvesting hazelnuts was 10,5 hours (10 hours in Gümüşova) during the 2018 harvest. The longer hours reduces the hourly wage under the 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 international hazelnut companies. Their resentment grows year by year and they feel very unwilling to discuss fair compensation for workers.

## *Olam 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

